**INTEGRATED SAFEGUARDS DATA SHEET**  
**ADDITIONAL FINANCING**

**Report No.:** ISDSA14956

**Date ISDS Prepared/Updated:** 25-Aug-2015  
**Date ISDS Approved/Disclosed:** 26-Aug-2015

### I. BASIC INFORMATION

#### 1. Basic Project Data

<table>
<thead>
<tr>
<th>Country:</th>
<th>Bangladesh</th>
<th>Project ID:</th>
<th>P155389</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parent Project ID:</td>
<td></td>
<td>P090807</td>
<td></td>
</tr>
<tr>
<td>Project Name:</td>
<td>Additional Financing Skills and Training Enhancement Project (P155389)</td>
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<tr>
<td>Parent Project Name:</td>
<td>Bangladesh - Skills and Training Enhancement Project (P090807)</td>
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<tr>
<td>Task Team Leader(s):</td>
<td>Md. Mokhlesur Rahman</td>
<td></td>
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</tr>
<tr>
<td>Estimated Appraisal Date:</td>
<td>17-Aug-2015</td>
<td>Estimated Board Date:</td>
<td>29-Oct-2015</td>
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<tr>
<td>Managing Unit:</td>
<td>GED06</td>
<td>Lending Instrument:</td>
<td>Investment Project Financing</td>
</tr>
<tr>
<td>Sector(s):</td>
<td>Public administration- Education (5%), Vocational training (90%), General industry and trade sector (5%)</td>
<td></td>
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<tr>
<td>Theme(s):</td>
<td>Decentralization (5%), Export development and competitiveness (10%), Technology diffusion (10%), Education for the knowledge economy (75%)</td>
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<tr>
<td>Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?</td>
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#### Financing (In USD Million)

<table>
<thead>
<tr>
<th>Financing Source</th>
<th>Amount</th>
<th>Total Project Cost:</th>
<th>120.80</th>
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<tr>
<td>BORROWER/RECIPIENT</td>
<td>20.80</td>
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<tr>
<td>International Development Association (IDA)</td>
<td>100.00</td>
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<tr>
<td>Total</td>
<td>120.80</td>
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</table>

<table>
<thead>
<tr>
<th>Environmental Category:</th>
<th>B - Partial Assessment</th>
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<tbody>
<tr>
<td>Is this a Repeater project?</td>
<td>No</td>
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</table>
2. Project Development Objective(s)

A. Original Project Development Objectives – Parent
The project development objective is to strengthen selected public and private training institutions to improve training quality and employability of trainees, including those from disadvantaged socioeconomic backgrounds.

B. Proposed Project Development Objectives – Additional Financing (AF)

3. Project Description
Component 1. Improve the Quality and Relevance of Training: This component has two sub-components. Sub-component 1.1 focuses on the expansion of support to targeted public and private institutions offering diploma level programs. The AF will extend competitive institutional grants to new and existing institutions as well as expand stipend support for disadvantaged students. Sub-component 1.2 focuses on the expansion of support to selected additional institutions providing short-term vocational and technical training. The AF will facilitate grants to new short-course training institutions and support to market-relevant trades.

Component 2. Innovative Programs in TVET: This component, originally titled “Pilots in TVET”, has been renamed “Innovative Programs in TVET”. It has three sub-components: (i) establishment and operationalization of the NSDCS and ISCs; (ii) an apprenticeship program in the secondary level vocational training program; and (iii) Recognition of Prior Learning.

Component 3. Institutional Capacity Development: This component will continue to focus on strengthening the institutional capacity of the Directorate of Technical Education (DTE), the Bangladesh Technical Education Board (BTEB) under the Ministry of Education (MOE), and the Bureau of Manpower Employment and Training (BMET) under the Ministry of Expatriates’ Welfare and Overseas Employment (MOEWOE) and Ministry of Public Administration (MOPA).

Component 4. Project Management, Communications, Monitoring and Evaluation: This component will continue to support project management, monitoring and evaluation of Project progress and outcomes.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)
The program will be implemented nationwide. The project will support small civil works, rehabilitation of existing schools, and construction of additional training rooms or laboratories. As activities supported by this project are limited to rehabilitation works, it is expected that no land acquisition and/or resettlement will be caused by civil works. In addition, the exact location of training centers supported by this project will only be known during project implementation. For that reason, a Framework approach has been taken to mitigate potential negative impacts, and an Environmental Management Framework (EMF) has been prepared.

From an environmental perspective, the most important issues to address include: (i) rehabilitation and renovation of existing buildings, classrooms, workshops and libraries, (ii) introduction of environmental, occupational health and safety curricula in training institutions, and (iii) safe disposal of waste generated from laboratories and workshops.
The project will not trigger OP/BP 4.12 on Involuntary Resettlement. A mandatory requirement for eligibility is that no land acquisition is necessary to implement civil works. Furthermore, all project civil works will be carried out in existing infrastructure or on land that is already the property of the institutes concerned.

The project triggers OP/BP 4.10 on Indigenous Peoples (or Adivasis as they are referred to in Bangladesh), since the location of training institutions to be selected for financing under the project is not known ex-ante and some may be in areas inhabited by Indigenous Peoples. The project will make best efforts to include Indigenous groups and other marginalized or disadvantaged people as project beneficiaries, through appropriate consultation, outreach and targeting strategies.

To comply with World Bank social safeguards policies and to ensure inclusiveness of approaches, the GOB has prepared a Social Management Framework. Beyond compliance with safeguards measures, the GOB and the Bank team have agreed to target scholarships using means testing so that children from marginalized and disadvantaged groups will be able to participate as program beneficiaries. Finally, gender-equity is an issue that the GOB has paid tremendous attention to and has achieved gender parity in both primary and secondary education. Record keeping for vocational and technical programs is poor, and we do not have a clear understanding of the proportion of girls/women in such programs, though anecdotal figures suggest that the proportion is quite low.

5. Environmental and Social Safeguards Specialists

Nadia Sharmin (GSURR)
Sabah Moyeen (GSURR)
Shakil Ahmed Ferdausi (GENDR)

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>The project involves only rehabilitation/renovation/refurbishment of existing building, classrooms, workshops, and library, and enhancement of workshop and laboratory facilities. Component 3 will support vertical expansion of the three floors of DTE. The chemical constituents of the raw materials may require special disposal unit. To ensure limited environmental impact due to the expansion of the existing building to accommodate the workshop/laboratories for new trade courses, if necessary, World Bank OP 4.01 for Environmental Assessment Policy will be followed.</td>
</tr>
<tr>
<td>Natural Habitats OP/BP 4.04</td>
<td>No</td>
<td></td>
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<tr>
<td>Forests OP/BP 4.36</td>
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<tr>
<td>Pest Management OP 4.09</td>
<td>No</td>
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<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Indigenous Peoples OP/BP 4.10</td>
<td>Yes</td>
<td>The STEP AF triggers OP/BP 4.10 on Indigenous People</td>
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</tbody>
</table>
BP 4.10 (IP). The selection of institutes to receive project financing will reveal the exact location of the institutes and since it is difficult to determine whether program sites coincide with those districts where there is a significant presence of IP groups. If this does happen, GOB has prepared a Social Assessment and Management Framework which will come into effect. In each such location, the selected institute’s Institute Development Plan, will be shared with IP groups and wide consultations will be held with these groups. These consultations will be prior, free and informed so as to ensure their compliance with the IDA’s OP/BP 4.10. In addition to IP groups, the project will also directly support gender equity in training programs and emphasize access for all female students and marginalized groups. In particular, means-testing will be used to identify and support potential trainees from poor and disadvantaged groups.

Involuntary Resettlement OP/BP 4.12 No The activities identified under the project are mainly technical assistance in nature and no major infrastructural activities are proposed. It will not require any acquisition of land, construction of any new institution or building or any major physical expansion. Hence, the project will not trigger the Bank’s OP/BP 4.12 on Involuntary Resettlement. The SMF includes a negative list of activities that involve involuntary resettlement of people/households which will be ineligible for support under STEP-AF.

Safety of Dams OP/BP 4.37 No

Projects on International Waterways OP/BP 7.50 No

Projects in Disputed Areas OP/BP 7.60 No

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

   The major tasks in the STEP Additional Financing (AF) with environmental issues involved in the project include: rehabilitation/renovation/ refurbishment of existing building, classrooms, workshops, and library, and enhancement of workshop and laboratory facilities. These tasks are under Component 1. Component 3 will support vertical expansion of the three floors of Directorate of Technical Education (DTE). The chemical constituents of the raw materials may require special disposal unit. To ensure limited environmental impact due to the expansion of the existing building to accommodate the workshop/laboratories for new trade courses, if necessary,
World Bank OP 4.01 for Environmental Assessment Policy will be followed.

Given that the nature of all the above referenced activities are small and highly localized in nature, there are no large scale, significant and/or irreversible impacts associated with STEP AF. Only minor and localized impacts are expected to arise from such construction and/or upgrading of existing infrastructure. Others issues that will be addressed through the project will be to ensure that institutions that receive project financing have appropriate classroom and laboratory conditions (e.g., light, ventilation, temperature and noise), students have access to adequate protective gear (e.g., helmets, goggles, gloves, boots, etc.), proper sanitation (latrines and waste-management), and appropriate means of disposing waste materials generated through the training program. Furthermore, all institutes will be required to offer as part of the training, courses on occupational safety as it pertains to the specific trades being covered by the institute.

The STEP AF triggers OP/BP 4.10 on Indigenous People (IP). Since the exact locations of project implementation are yet to be determined, an Indigenous Peoples Plan (IPP) will need to be developed if a project site is determined to be in an IP populated area. This will help ensure that all IP groups in the project area have an opportunity to participate in training that is culturally appropriate. In addition, the process by which such training is guaranteed will meet the World Bank’s OP/BP 4.10 on Indigenous Peoples which requires free, informed and prior consultations with IP groups during project preparation and implementation, leading to broad-based support for the proposed training program. If an IPP is required to be prepared, the institution which has triggered the policy will be responsible for preparing the IPP. These institutions will include the polytechnic institutes that will participate in the project.

The original project has supported an increase of female TVET students, by (i) providing stipends to all female students to alleviate financial constraints, (ii) removing the supply-side constraint by improving the institutional environment, and (iii) increasing awareness raising. As a result, the enrollment share has increased from 5 percent in 2008 to 30 percent in 2014 in the project supported institutions. Training institutions are offering more female-favored training courses, including garments, computer, civil-engineering, and electronics. Success stories of female TVET graduates in opening self-employment businesses or working in industries have been widely disseminated among potential training aspirants for encouraging their participation in skills training. The AF will continue to support participation of women in skills training through direct stipend support at polytechnics and short-courses, and policy level support for making training environment more attractive to women. The Results Framework of the AF will provide information on female beneficiaries as well as the pass rate of female and disadvantaged students.

The activities identified under the project are mainly technical assistance in nature and no major infrastructural activities are proposed. It will not require any acquisition of land, construction of any new institution or building or any major physical expansion. Hence, the project will not trigger the Bank’s OP/BP 4.12 on Involuntary Resettlement. The SMF includes a negative list of activities that involve involuntary resettlement of people/households which will be ineligible for support under STEP-AF.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

There are no expected indirect or direct long term impacts of STEP after following guidelines above.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse
Given the nature of STEP, no alternative proposals were feasible for the small scale infrastructure works being considered under this project. Furthermore, the project does address some key equity issues directly.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Under the original STEP project, the GOB has invested considerable effort in developing the Environmental Management Framework (EMF) and Social Assessment and Management Framework (SAMF) covering environmental and social safeguards issues respectively. Over the past few years, the Directorate of Technical Education (DTE) has developed enhanced capacity to implement a Bank led program. DTE and Ministry of Education (MOE) is now very familiar with IDA supported projects and in particular the environmental and social safeguards issues therein.

The STEP AF’s EMF defines simplified steps, procedures and emphasizes use of guidelines or criteria and/or standards while planning, developing and executing civil works under the project. DTE has been gaining experience with World Bank project through STEP. DTE designated a focal person to ensure the environmental compliance of STEP activities in light of the EMF. The DTE local focal persons are primarily responsible of filling out the screening forms and sending them to DTE PIU for review. The activities of the DTE focal person will include: (1) coordinating the environmental screening activities in different institutions where physical interventions are being made, (2) assessing the nature of the impacts, (3) preparing IEE/EIA whenever necessary, (4) ensuring that the EMP is adequately reflected in the Contractor’s bidding documents, (5) carry out monitoring activities in the works sites to assess the implementation of the EMP, (6) preparing reports of monitoring activities from time to time, (7) oversee the enhancement measures (incorporation of occupational health and safety in curriculum, establishing synchronized operating protocols for the laboratories) and tracking their progress. Based on the environmental screening, budget for implementation of EMP will be allocated with each sub-project. The additional financing has provision of an Environmental and Social Safeguard Specialist to strengthen the implementation and reporting of the EMF. The specialist will review all the sub-project specific documents and related the environmental safeguard issues, monitor the environmental issues during implementation and operational stage and will help to prepare the environmental law and occupational safety courses to be incorporated in the curricula. In addition, DTE will also assign 2 staffs. These staff will be trained on monitoring environmental management in the campus during project implementation and operational stage.

Project Director of DTE will submit half yearly progress report on the environmental management to the World Bank. The report will have two parts. One part will contain the initial screening report of all proposals, identified environmental concerns, appropriate mitigation measures and monitoring plan and costing. Another part will present the monitoring and management status of the EMP implementation of the ongoing activities in the selected institutions.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The EMF will be shared by the Ministry of Education with concerned academic institutions, Department of Environment and civil society. It has been disclosed in both Bangla and English by the Ministry of Education on behalf of the GoB in Bangladesh and it has also been made available at the World Bank’s InfoShop.

B. Disclosure Requirements
### Environmental Assessment/Audit/Management Plan/Other

| Date of receipt by the Bank | 29-Jul-2015 |
| Date of submission to InfoShop | 25-Aug-2015 |
| For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors | /// |

#### "In country" Disclosure

<table>
<thead>
<tr>
<th>Country</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bangladesh</td>
<td>29-Jul-2015</td>
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**Comments:** The Draft EMF, SMF and Framework and Guidelines for Small Ethnic Communities Plan were disclosed by GoB for public comments on July 25, 2015. These documents were redisclosed after the Bank's review on August 25, 2015.

### Indigenous Peoples Development Plan/Framework

| Date of receipt by the Bank | 29-Jul-2015 |
| Date of submission to InfoShop | 25-Aug-2015 |

#### "In country" Disclosure

<table>
<thead>
<tr>
<th>Country</th>
<th>Date</th>
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<tbody>
<tr>
<td>Bangladesh</td>
<td>25-Aug-2015</td>
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</table>

**Comments:** The Draft EMF, SMF and Framework and Guidelines for Small Ethnic Communities Plan were disclosed by GoB for public comments on July 25, 2015. These documents were redisclosed after the Bank's review on August 25, 2015.

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.

If in-country disclosure of any of the above documents is not expected, please explain why:

### C. Compliance Monitoring Indicators at the Corporate Level

#### OP/BP/GP 4.01 - Environment Assessment

<table>
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<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>Does the project require a stand-alone EA (including EMP) report?</td>
<td>Yes [ ] No [ × ] NA [ ]</td>
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#### OP/BP 4.10 - Indigenous Peoples

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<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?</td>
<td>Yes [ × ] No [ ] NA [ ]</td>
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<tr>
<td>If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?</td>
<td>Yes [ × ] No [ ] NA [ ]</td>
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<tr>
<td>If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?</td>
<td>Yes [ ] No [ × ] NA [ ]</td>
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#### The World Bank Policy on Disclosure of Information

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Have relevant safeguard policies documents been sent to the World Bank's Infoshop?</td>
<td>Yes [ × ] No [ ] NA [ ]</td>
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<tr>
<td>Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?</td>
<td>Yes [ × ] No [ ] NA [ ]</td>
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### All Safeguard Policies

<table>
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<tr>
<th>Question</th>
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<tbody>
<tr>
<td>Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?</td>
<td>Yes</td>
<td>No</td>
<td>NA</td>
</tr>
<tr>
<td>Have costs related to safeguard policy measures been included in the project cost?</td>
<td>Yes</td>
<td>No</td>
<td>NA</td>
</tr>
<tr>
<td>Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?</td>
<td>Yes</td>
<td>No</td>
<td>NA</td>
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<tr>
<td>Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?</td>
<td>Yes</td>
<td>No</td>
<td>NA</td>
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### III. APPROVALS

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Task Team Leader(s)</td>
<td>Name: Md. Mokhlesur Rahman</td>
<td></td>
</tr>
<tr>
<td>Approved By</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Safeguards Advisor:</td>
<td>Name: Maged Mahmoud Hamed (SA)</td>
<td>26-Aug-2015</td>
</tr>
<tr>
<td>Practice Manager/Manager:</td>
<td>Name: Halil Dundar (PMGR)</td>
<td>26-Aug-2015</td>
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