



**SOCIAL MANAGEMENT FRAMEWORK (SMF)
&
SMALL ETHNIC COMMUNITIES PLANNING FRAMEWORK (SECPF)**

CASH TRANSFER MODERNIZATION (CTM) PROJECT

July 30, 2017

Department of Social Services
Ministry of Social Welfare
Bangladesh

Table of Contents

Abbreviations.....	3
Executive Summary	4
1. Introduction	6
2. The Background & Current Status	6
3. Scope of CTM Project.....	7
4. CTM: Social Implications & SMF Objectives.....	7
5. Citizen Engagement Strategy.....	8
6. Eligibility for Safety Net Benefits	11
7. Addressing Gender Issues.....	14
8. Beneficiary Selection	14
9. Implementation Arrangement.....	15
10. Monitoring & Documentation	15
11. Public Disclosure of SMF	16

Abbreviations

BBS	Bangladesh Bureau of Statistics
BPO	Bangladesh Post Office
CHT	Chittagong Hill Tracts
CSO	Civil Society Organization
CTM	Cash Transfer Modernization
DD	Deputy Director (at district level)
DSS	Department of Social Services
GOB	Government of Bangladesh
GRM	Grievance Redress Mechanism
HIES	Household Income and Expenditure Survey
IDA	International Development Agency
IP	Indigenous Peoples
MIS	Management Information System
MOSW	Ministry of Social Welfare
NGO	Non-Government Organization
NHD	National Household Database
NSSS	National Social Security Study
OP	Operational Policy
OP 4.10	Operational Policy 4.10 on Indigenous Peoples
OP 4.12	Operational Policy 4.12 on Involuntary Resettlement
PD	Project Director
PS	Pourasabha
PMT	Proxy-Means-Test
PMU	Project Management Unit
SEC	Small Ethnic Community
SECPF	Small Ethnic Community Planning Framework
SMF	Social Management Framework
UDC	Union Digital Center
UP	Union Parishad
USSO	Upazila Social Services Officer
USW	Union Social Worker
UZP	Upazila Parishad
WB	World Bank

Executive Summary

This Social Management Framework (SMF) is prepared for the Cash Transfer Modernization (CTM) Project in order to mitigate potential social concerns that may arise during the Project implementation. The CTM Project, implemented by the Department of Social Services (DSS) under the Ministry of Social Welfare (MOSW), is aimed at improving transparency and efficiency of cash transfer programs for socioeconomically vulnerable people. It will do so by modernizing the existing beneficiary selection and payment systems in four existing cash transfer programs implemented by DSS targeted for poor and vulnerable individuals. Since the project is a nationwide initiative and interventions may cover areas inhabited by tribal people, the World Bank's Safeguard Policy OP/BP 4.10 on Indigenous People has been triggered, and DSS has prepared a separate Small Ethnic Community Planning Framework (SECPF).

Typical challenges in the implementation of cash transfer programs in Bangladesh include program fragmentation, lack of pro-poor targeting, administrative challenges and limited social accountability. Based on these rationales, the CTM Project aims to work with the Old Age Allowance, the Widows' and Abandoned Women's Allowance (Widow Allowance), Disabilities Allowance and Disabled Students Stipends with the following aims of reform:

- a. Modernization of Beneficiary Selection and Management Systems; and
- b. Modernization of Beneficiary Payment Systems.

This SMF has the following objectives:

- Ensuring intended positive social outcomes of the safety net programs
- Promoting top-down and bottom-up communication to facilitate citizens' engagement through increased awareness of the program entitlements and eligibility, more accessible grievance redress mechanisms and beneficiary voice and feedback
- Ensuring compliance with the relevant Government and World Bank policies on social safeguards, inclusion and gender.

Following are the key guidelines contained in this SMF:

Citizen Engagement and Communication

- **Public Information and Communication Campaign (PICC)** will inform people about eligibility, entitlements and the grievance redress process of the programs; this will be outsourced to professional agencies by DSS and is expected to generate beneficiary awareness.
- **Community consultations during preparation:** consultations have taken place at the preparation stage of CTM Project and included ethnic minorities in Mymensingh and Rangamati in the Chittagong Hill Tracts of the country. The consultations have revealed positive impacts of the programs in terms of women's economic empowerment, stimulation of income generating activities and alleviation of begging as well as improved social status of poor people with disabilities. However, a large number of non-poor beneficiaries was cited as a major problem.
- **Community consultations during implementation:** continued consultations are required through PICC as well as during operational reviews, coordinated by the Upazila Social Service Officers (USSOs), to regularly engage citizens and enable the voice and participation of the poor and vulnerable. These consultations should provide information about the NHD based

selection system as well as modernized payments through payment service providers, and citizens should be able to provide their feedback. The venues and times of these consultations should be widely communicated, ensuring the participation of the locally elected representatives and the poor and vulnerable as well as women.

- **Operational reviews:** these will be through third party spot checks to assess the quality of implementation and also collect beneficiary feedback about the programs and service quality.
- **Grievance redress mechanism (GRM):** this will be facilitated by the Management Information System (MIS) so aggrieved people will be able to file grievances at any locations with an online connection in the MIS. The GRM process will be facilitated particularly by Union Social Workers in case the MIS based system is faced with technical challenges.

Beneficiary selection will be based on verification with the National Household Database (NHD) for the verification of individuals' socio-economic status. The eligibility criteria and selection and enrollment process are detailed in the project's Implementation Manuals. The eligibility verification will be carried out by the MIS that is linked to NHD once applications have been received. The final selection of beneficiaries from a roster of eligible applicants would be taken by the Union Committee based on resource availability and priority rules. Locally, the USSO, with the MIS as the central instrument, would be critical in managing the application and selection process and coordinating with payment service providers on enrolment and payment to enrolled beneficiaries. In addition, ensuring citizens are able to file grievances regarding beneficiary selection in accessible locations without fear of reprisal is another important responsibility that the USSO would oversee. The effectiveness of these processes would be monitored through a number of indicators using data from the MIS as well as operational review/spot check surveys.

The SMF is subject to the review of the World Bank *prior* to public disclosure. No provisions in the SMF may be amended, abrogated or suspended without the Bank's clearance. DSS will disclose Bangla translation of this SMF to the public in Bangladesh by posting it in its website (<http://www.dss.gov.bd/>), and authorize the World Bank to disclose it at its Country Office Information Center and in its Infoshop. DSS will also ensure that copies of the translated document are made available at its headquarters and at its District and Upazila offices; local government offices at Upazila, Union / Pourasabha levels, and other places that are easily accessible by the general public. As to disclosure, DSS will inform the public through notification in two national newspapers (Bangla and English) about the SMF indicating where it could be accessed for review and comments.

1. Introduction

This Social Management Framework (SMF) is prepared for the Cash Transfer Modernization (CTM) Project in order to mitigate potential social concerns that may arise during its implementation. The CTM Project will be implemented by the Department of Social Services (DSS) under the Ministry of Social Welfare (MOSW). The project is aimed at improving transparency and efficiency of cash transfer programs for socioeconomically vulnerable people by modernizing the existing service delivery systems and practices. The project will build upon, as well as complement, the existing investments in the sector by the Government of Bangladesh, and support integration of a number of administrative systems to enhance transparency and efficiency of these programs.

In this regard, the project financing policy of the Bank requires the borrowers to assess social impacts and, if necessary, prepare and implement mitigation measures according to its social safeguard policies. Since the Project interventions, as a nationwide initiative, may cover some or all of the 28 locations¹ within the country inhabited by tribal people, the World Bank's Safeguard Policy OP/BP 4.10 on Indigenous Peoples has been triggered, and DSS has prepared a Small Ethnic Community Planning Framework² as an annex to the SMF.

2. The Background & Current Status

Bangladesh is one of the world's most populous countries. With per capita income of US\$1,409 in 2016, it is well above the lower middle income country category threshold. Despite much progress, however, poverty and vulnerability remain great challenges, as a large number of people live below and around the poverty line and face various risks; thus a more robust social protection system is needed to address the challenges. The Government of Bangladesh has already recognized the aforementioned challenges and is preparing policies to effectively address these issues, as evidenced in the National Social Security Strategy (NSSS) 2015:

- *Program Fragmentation:* Bangladesh currently implements more than 140 social safety net programs through more than 20 ministries. It is recognized that there is an urgent need to consolidate the similar interventions and strengthen the major programs to rationalize program delivery.
- *Lack of Pro-Poor Targeting:* Presently, there are no scientific targeting mechanisms to identify the poor eligible for financial assistance. This led GOB and the Bank to agree that a unified targeting system that enables various programs to identify the households that are truly poor, can significantly improve accuracy of targeting and program efficiency.
- *Administrative challenges:* Monitoring and implementation of programs are affected by administrative challenges leading to problems with beneficiary selection and payment of benefit especially in case of food and also cash transfers. This has particularly negative impact on the elderly and persons with disabilities, whose direct access to service points like commercial banks becomes limited and the use of intermediaries becomes necessary.

¹ Exact locations are to be determined

² Since the Government of Bangladesh terms indigenous people as a group of people belonging to the small ethnic community, it is decided that the 'indigenous' peoples in the Bank's operational policy should be referred to as peoples of Small Ethnic Community. But for all operational purposes this ethnic group fully corresponds to the definition of indigenous peoples given in the OP 4.10. In this document, SEC will always mean 'indigenous peoples', except where references are made to the Bank policy

- *Limited Social Accountability:* Lack of citizen engagement results in weak social accountability. Intended program beneficiaries, especially the elderly, widowed and persons-with-disabilities, often have limited awareness of the safety net programs and the procedures to enroll and receive the benefits. Grievance redress channels are seldom utilized due to lack of awareness, limited accessibility, fear of reprisal and perceptions of ineffectiveness.

3. Scope of CTM Project

The CTM project will essentially address the issues discussed above and carry out reforms in areas identified in the NSSS. The proposed reforms - and other associated issues – are embedded in the three components proposed under the project. The first two will be implemented by DSS and the third by BPO.

Component 1: Enhancement of Cash Transfer Programs: This will finance a portion of the expenditures under the Old Age Allowance, Widows Allowance, Disability Allowance and Disabled Students Stipend against the achievement of performance targets set to support modernization of these programs. Fiscal resources will be expanded and the benefit amount would be adjusted based on a process to rationalize geographical distribution of resources, making them more equitable in terms of coverage.

Component 2: Modernization of Beneficiary Selection & Management Systems: This will provide support to (i) establish protocols for beneficiary selection and validation by integrating the DSS MIS with the National Household Database (NHD) being developed by the Bangladesh Bureau of Statistics (BBS), based on a Proxy-Means-Test (PMT) methodology. BBS has finalized the PMT formula based on the Household Income and Expenditure Survey (HIES) of 2010 which contains detailed information on nationally representative households' socioeconomic status, along with household characteristics. The targeting method will (i) determine "poverty score" of every household using NHD information³; (ii) select the most eligible of the beneficiaries based on the poverty score; and (iii) develop a fully digitized service delivery process which will include application, grievance redress and payment functions by integrating the DSS MIS with the system of a payment service provider. This would allow for a demand-driven application process with objective selection criteria that would minimize manual interventions. The component would provide financing for necessary hardware and technical support, service fees, debit cards, training and other operating costs.

Component 3: Modernization of Beneficiary Payment Systems: This Component would provide technical assistance to BPO to support the enhancements of technology assets, utilize and build its infrastructure, pilot innovations, and strengthen the capacity of human resources.

4. CTM: Social Implications & SMF Objectives

³ Poverty Scoring is based on variables that are highly associated with the households' poverty status, and are observable and verifiable. The weights of the variables were determined based on their association with household welfare. BBS will conduct door-to-door census to collect key information including ownership of assets, labor market activities of household heads and other demographic information.

The SMF, as proposed here, contains principles, procedure and guidelines to make the social safety net programs more inclusive and truly pro-poor. In specific the objectives are:

- Enhancing intended positive social outcomes of the safety net programs administered under *Old Age Allowance; Widow Allowance; Disability Allowance; and Disabled Students Allowance*, supported by the proposed project;
- Promoting two-way communications:
 - Bottom up: participation of communities, including poor men and women of vulnerable and marginalized groups, in open meetings to collect their opinions and information about beneficiaries' experience with the project; filing of grievances;
 - Top down: and raising awareness of the programs' objectives, beneficiaries' eligibility criteria, selection process and entitlements as well as grievance redress process;
- Improving the existing grievance redress system by encouraging beneficiaries to file complaints and cases through the MIS; and,
- Ensuring compliance with the relevant GOB policies and those of the World Bank on social safeguards and social inclusion issues, including those with gender implications.

In addition, as the project will cover the entire country including many of the districts inhabited by the indigenous peoples, the World Bank policy OP/BP 4.10 on Indigenous Peoples will be triggered. Among those are three districts of the Chittagong Hill Tracts (CHT) which are home to the largest proportion of the people who belong to the Small Ethnic Communities (SECs).⁴ In addition, there are 25 districts in the plains that are also inhabited in small proportions by the peoples of SECs. They often live in physically separated settlements alongside mainstream peoples. In order to deal with social safety net issues that may also concern them, DSS has prepared a standalone Small Ethnic Community Planning Framework (SECPF), which is annexed in this document.

5. Citizen Engagement Strategy

Community Consultations during Preparation

Preparation of the project has utilized the experience gained from the ongoing programs, inputs from various studies done on poverty assessment and community consultations undertaken at different times. Community / beneficiary consultations were again conducted during preparation of the current project. Most recent consultations consisted of 7 meetings in Haluaghat upazila of Mymensingh in the plains, and 2 in Wagga and Chandraghona Unions of Kaptai upazila of Rangamati in the Chittagong Hill Tracts (CHT). The participants included beneficiaries from both mainstream and small ethnic communities under the ongoing programs, as well as others who intend to be considered under the CTM project. While consultations in general included all, separate consultations were also conducted with women to learn about their experience and concerns about the ongoing programs.

The participants were informed of the objectives of the 4 safety net programs. The eligibility criteria, as published in the individual program manuals in Bangla, were discussed in detail, and

4 The Government of Bangladesh does not recognize the term "indigenous", rather calls them as a community/group belonging to the Small Ethnic Community (SEC) that also includes various other minority communities/groups. For operational purposes in Bank-supported projects, including CTM, peoples of SEC are those who conform to the definition of indigenous peoples provided in OP 4.10 on Indigenous Peoples.

discussions followed on the various difficulties faced in selection of beneficiaries and payment system through bank-branch. Some notable findings include:

- The impact of the four programs is disproportionately positive on women as they tend to constitute the majority of distressed and hardcore poor.
- Participation of women in the programs stimulates positive externalities in the society and the household. This also works to empower women.
- The programs have reduced begging and many beneficiaries have engaged in income generating activities.
- Coverage and budgetary allocation of these four programs are increasing every year.
- Beneficiaries with disabilities feel valued in the household due to the benefits they receive through these programs.
- A large number of beneficiary households are non-poor.
- At least 20% of the aged vulnerable and disabled people in Haluaghat, Mymensingh are unable to go to the post office and collect the money and thus assigning nominees would be highly important.

Participants were also apprised of the proposed changes in beneficiary selection and benefit payment system through the CTM project. Many perceived that payment and receipt of benefits through Post Offices would be easier. However, some thought that it may still be difficult for many of the disabled beneficiaries who are either immobile or cannot walk far enough to reach the post offices.

The project will support a two-way flow of ***citizen engagement***: top down and bottom-up. The 'top down' citizen engagement strategy will involve information campaigns while the bottom-up strategy will include consultations with communities, feedback through third party surveys and a grievance redress mechanism (GRM).

Consultations during implementation

DSS, in collaboration with the UPs, will undertake information campaign and organize ward-based community / stakeholder consultations about the objectives of social safety net programs, and explain how the proposed CTM project would help modernize the ongoing programs. The consultations would include UP Chairpersons and Ward Members (WM) / Commissioners (WCs). For consultations, DSS / USSO / USW and UP / WMs / WCs will use the following guidelines.

- The date, venue and time of these consultation meetings would be widely publicized well in advance so that people can arrange to participate.
- The UP Chair / WMs / WCs and DSS will encourage participation of poor men and women, and others who might qualify for safety net benefits under any of the programs.
- Consultations will be held in open meetings in an environment where the participants, irrespective of their socioeconomic status, would be able to freely express their experiences, observations and opinions.
- Depending on local culture and tradition, DSS / WMs / WCs will hold separate consultations with women and record their concerns, if any, regarding selection of beneficiaries and payment of the benefits. To the extent feasible, DSS will address the issues in program design and implementation.
- To address gender related issues DSS will always disaggregate the information provided by men and women, that may include their experience about the ongoing programs, questions

they have asked and opinions expressed, and inputs / feedbacks they have given, etc., from the joint and separate consultations.

Consultations will include an overview of performance of the ongoing programs in targeting the truly poor and delivering the safety net benefits through bank-branch system, focusing on current problems. Without going into technical details, DSS / USSOs / UPs will explain:

- The changes made in beneficiary selection with the help of NHD;
- The digitized payment system through the Bangladesh Post Office; what the selected beneficiaries would be required to do; and what they could do if the system does not work.

The Grievance Redress Mechanism (GRM) and the procedural steps for an aggrieved person to lodge a complaint (details below).

Public Information and Communication Campaign

In view of the difficulties in targeting the truly poor and vulnerable, it is absolutely necessary that people - regardless of their socioeconomic status - are made aware of the programs and eligibility conditions of beneficiaries. Openness, widespread publicity and participation in general could possibly prevent / minimize selection of non-poor beneficiaries, duplications, and increase accountability regarding benefits that have been the most important impediments to targeting the truly poor and most eligible of the beneficiaries.

Information, education, and communication activities with a wider range of stakeholders and beneficiaries, including citizens, the media, civil society organizations, and local government institutions and central government agencies are critical to general awareness at multiple levels. Public Information and Communication Campaign (PICC), outsourced by DSS will be key to citizen engagement throughout the implementation of CTM project by providing information about eligibility, entitlement, application process etc. In addition, DSS's MIS will have a module for GRM which can be used by aggrieved people to lodge complaints. This too will be publicized by the PICC.

Operational Review Services (ORS)

A third party monitoring service provider will carry out interviews to collect beneficiary feedback about the project besides carrying out spot checks and/or process reviews that assess the quality of program implementation and compliance to guidelines. In doing so, the ORS is expected to track progress by using indicators like share of the beneficiaries aware of application and selection process, and satisfied with the service delivery.

DSS will work out a schedule for PICC and ORS in consultation with institutional stakeholders, including the Bank. However, PICC is likely to be held at the beginning of the project and once every year while ORS is expected to be held twice each year.

Grievance Redress Mechanism (GRM)

It is widely observed that projects that are aimed at benefiting the poor and vulnerable tend to be prone to elite capture potentially depriving intended beneficiaries. In this context, it is expected that a strong, fully functional Grievance Redress Mechanism (GRM) is an important pre-requisite for effective implementation of such programs. It is thus decided that CTM project will have a much strengthened, easily accessible GRM to deal with grievances and complaints that may range from selection of beneficiaries to actual delivery of the benefits. This will potentially help minimize selection of non-poor, enhance accountability with benefit payments, duplication of beneficiaries and other operational issues. A strong GRM will also enhance social

accountability on the parts of those involved in supervision and monitoring of the programs. But it should be noted that GRM does not pre-empt an aggrieved person's right to go to courts of law.

In order to lodge and review grievances, CTM project will use the existing grievance redress module in the MIS of DSS. In this system, an aggrieved person willing to file a grievance will ask the Union Social Worker (USW) to enter it into the MIS using the Union Digital Center (UDC), or any other facility where internet and computer services are available in the Union. In addition to the facilities that already exist at the UDCs, CTM will equip USWs with devices to enable them to access the MIS. In addition to the MIS, a manual register would be maintained to avoid loss of data in cases of technical problems like poor internet connectivity, or problems with the MIS itself.

The USW's role is crucial to facilitate an aggrieved person's access to the internet and thus the MIS to lodge his or her complaint. It is important to note that the USW will enter all complainants into the system regardless of their merits. As an evidence that the complaint has been entered into the system, the USW will give the complainant a signed copy of the printout, or any other signed written evidence where internet connectivity is unavailable.

The USSO will review the grievances and complaints and try to resolve them. If not resolved, the USSO will forward them to the Deputy Director (DD) at the district level. If the DD is unable to resolve the grievances, the cases would be forwarded to DSS, where the final decision would be made. The time required by DSS to complete the redress process of grievances lodged at the union level will be a core indicator of CTM Project.

Depending on the nature, each complaint will be categorized at respective levels (field and/or central) and forwarded to the responsible agency: (i) BBS if the complaint is related to the aggrieved person's non-inclusion in the NHD which might have hampered his/her selection into or eligibility for the DSS programs; (ii) the responsible payment service provider if the complaint is regarding payments; (iii) DSS if the complaint is regarding the program delivery itself. A decision accepted by an aggrieved person at any level of review would be binding on the persons / agencies who have caused the grievance.

6. Eligibility for Safety Net Benefits

The following eligibility criteria (as published in the individual Program Manual in Bangla), have been in use for the programs that CTM aims to work with.

Old Age Allowance (BDT 500 per month as of FY17)

Eligibility criteria

- The applicant must be a citizen and permanent resident of the Union from where request for benefit is made; there must be evidence of Birth Registration and/or National Identification Number.
- Men must be 65 years and above; women must be 62 years and above (Age will be determined based on National Identity Card, Birth Certificate, SSC and similar certificates. In cases of controversy, the Ward Committees' decision will be considered final. Whenever deemed necessary, GOB may review the age limits.).
- Priority given to the persons – men or women -- who are totally unable to work;
- Priority given in order of (i) widow; (ii) divorced female; (iii) widower; (iv) childless; and (v) men and women separated from the family.

- Priority given to landless (persons who may have homesteads, and other lands not more than 0.5 acre); and
- Prioritized in this order: (i) destitute; and (ii) displaced – for any reasons and living in public lands; and (iii) annual average income not more than Tk 10,000. (Tk 12,000 in cases of widowed women, and others deserted by husbands.)

Ineligibility - An applicant will be ineligible if he/she:

- receives financial benefits from another source. According to this provision, the following persons will be considered ineligible for social safety net benefits under the proposed program:
 - Government employees, persons on pension from the government;
 - Poor women who have been given VGD cards by the government;
 - Persons already receiving on a regular basis grants/allowances under other government programs; and
 - Persons already receiving on a regular basis grants/allowances from non-government organization / social welfare establishments.

Allowances for Widowed and Husband-Deserted Women (BDT 500 per month)

Eligibility criteria

- The applicant must be a citizen and permanent resident of the Union from where request for benefit is made; there must be evidence of Birth Registration and/or National Identification Number;
- The applicant must be aged 18 years or more;
- The applicant's annual income must be less than Tk 12,000;
- Priority will be given to those who are old, widowed or abandoned; destitute and almost landless (owns less than 0.5 acre of land); have two children under 16 years of age; are disabled.

Ineligibility – An applicant will be ineligible if he/she:

- migrates to another area and does not transfer her enrolment to the new area within 6 months;
- receives financial benefits from another source. According to this provision, the following persons will be considered ineligible for social safety net benefits under the proposed program:
 - Government employees, persons on pension from the government;
 - Poor women who have been given VGD cards by the government;
 - Women already receiving on a regular basis grants/allowances under other government programs; and
 - Women already receiving on a regular basis grants/allowances from non-government organization / social welfare establishments.
 - Women receiving widow allowance from multiple locations;
- marries or remarries while receiving the benefit.

Allowances for Insolvent Persons with Disabilities (BDT 700 per month)

Eligibility criteria

- Applicant must be a citizen and permanent resident of the Union from where request for benefit is made; there must be evidence of Birth Registration and/or National Identification Number.
- Applicant must be registered and obtain a disability certificate under the Bangladesh Welfare Act for Disabled Persons of 2001, in the district of residence;
- Per capita income cannot exceed Tk 36,000; the applicant must be a poor person with disabilities; and,
- Selection process will consider all disabled persons aged more than 6 years.

Ineligibility – An applicant will be ineligible if he/she is a/an:

- active government employee, or recipient of government pension;
- recipient of government grants from any other source; and
- recipient of economic grants from non-government/social welfare organizations.

Stipend for Students with Disabilities

Stipends are given per month for students at the following levels: Primary (Classes 1st to 5th: Tk 500); Secondary (Classes 6th to 10th: Tk 600); Higher Secondary (11th to 12th Tk 700; and Under Graduate & Graduate: Tk 1,200)

Eligibility criteria

- Applicant must be a citizen and permanent resident of the Union from where request for benefit is made; there must be evidence of Birth Registration and/or National Identification Number.
- Applicant must be registered and obtain a disability certificate under the Bangladesh Welfare Act for Disabled Persons of 2001, in the district of residence;
- Applicant must be a student of a government or government approved educational and technical institute
- The applicant must be aged 5 years or more;
- The applicant's guardian's income cannot exceed Tk 36,000 per year;
- The applicant's monthly class attendance rate must be 50% or more (waived for new students till later); and
- The applicant must have participated in all exams and passed the annual exam (waived for new students till later).
- The applicant must be a poor student with disabilities living in the school's/institute's catchment area.

Ineligibility - An applicant will be ineligible if he/she is:

- not in a government-approved school;
- employed by a government or non-government organization; and
- already receiving a stipend from any other government agency.

7. Addressing Gender Issues

The *Allowance for Widow and Husband-Deserted Women*⁵ is an exclusive program for women who presumably have no one to provide them with food and shelter, and other essential cares. The other three programs are also highly likely to include women of old age, disabled and school-going girl students with disability. As suggested under community / stakeholder consultations, DSS will disaggregate records of all information regarding women beneficiaries under the individual programs. Disaggregated recordkeeping will start with all women identified as the poorest in the NHD, as well as those who have eventually qualified (i.e. met the additional program specific eligibility criteria) to receive safety net benefits with the given amount of funds for the programs. GRM is considered another source of information about how well the programs are working with regard to selection of women beneficiaries, and benefit payment by the payment service provider. DSS and UPs will ensure that women use the GRM to lodge their grievances and complaints and seek redress without the fear of reprisal by any persons responsible for causing the grievances.

8. Beneficiary Selection

As noted above, the potential beneficiaries at Union and Ward levels will be selected by using the NHD developed by BBS. BBS is currently developing the NHD containing key household characteristics, using proxy means test (PMT) to determine poverty scores that are expected to indicate levels of poverty.⁶ The selection process is proposed as follows:

- Once citizens receive information about the application process and timeline, they will apply at Union Digitized Centers (UDCs), E-post Centers and Union Parishads¹. The applications will be populated onto the MIS.
- The MIS, at the DSS end, will carry out eligibility compliance check of the applications against the NHD which will have been linked to the DSS MIS. The list of eligible applicants will then be sent by DSS to the Upazila Social Services Officer (USSO) through the MIS. At the same time, eligible applicants as well as ineligible applicants will be notified through a provisional receipt. At this stage, the ineligible applicants will be informed of the GRM in case they wish to contest the result.
- The USSO will then print out the list of eligible applicants and present it for the Union Committee for selection of beneficiaries based on resource availability. Upon the Union Committee's approval of the list of list of eligible beneficiaries and ranked waitlisted eligible applicants, both lists will be sent to the Upazila committee. Upon final approval, the lists will be uploaded onto the MIS by the USSO.
- The approved list of beneficiaries and the waitlist would then be made available in the UDC, Safety Net Cell and printed copies pasted at the Union Parishad notice boards.

⁵ These women are generally married off underage by the poor parents -- most often to men who are also poor. When it becomes increasingly harder to provide food, the husbands flee homes leaving behind their wives -- often with a few children. In all such cases mothers and children suffer from serious malnutrition.

⁶ Poverty Scoring is based on variables that are highly associated with the households' poverty status, and are observable and verifiable. The weights of the variables were determined based on their association with household welfare. BBS will conduct door-to-door census to collect key information including ownership of assets, labor market activities of household heads and other demographic information. The BBS data are likely to be available to users in 2017.

- Approved beneficiaries would then receive training on the program.
- The list of approved beneficiaries would be sent to the payment service provider to plan and carry out enrolment, distribute financial instruments/cards, provide financial training to beneficiaries and finally make payments.
- Throughout the entire process, beneficiaries and applicants who have been rejected will be kept informed about their option to file any possible complaints through GRM.

9. Implementation Arrangement

DSS is the main implementing agency of the project. It will establish a Project Management Unit (PMU) headed by a Project Director (PD) and directly implement the following 2 components: *Enhancement of Cash Transfer Programs*, and *Modernization of Beneficiary Selection and Management System*. The project will be managed through field level officials of DSS i.e. the USSO who will coordinate the application and selection process and act as a critical link between the different levels of approval starting from the Union Committee to the DSS level, using the MIS for efficient and real time flow of beneficiary information including applications, lists of approvals and rejections as well as grievances. At the same time, the USSO would be key to coordinating with the union representatives of PSPs for payment to beneficiaries. The USSO will also be responsible for coordinating consultations and public information and communication campaigns prior to enrolment and prior to payments.

Bangladesh Post Office (BPO) will implement the third component on *Modernization of Beneficiary Payment System*.

10. Monitoring & Documentation

As noted above, currently, data for the four programs are being entered into the DSS MIS. This includes National Identification (NID) number and / or Birth Registration number (BRN), in addition to key individual characteristics required for program administration. The MIS is also planned to contain applications, lists of eligible and beneficiaries as well as lists of beneficiaries approved for payments and those waitlisted; grievances filed; as well as payment information and reconciliation reports from PSP. This range of information can be retrieved for analysis for the purpose of monitoring. DSS will in specific monitor the following, *separately for men and women under each of the 4 programs*:

Basic Information

- Percentage of existing beneficiaries recertified using NHD;
- Number of new beneficiaries, as a percentage of total, who have been selected and included in each program, by following the NHD lists in each program under the CTM;

Payment Information from PSP

- An account of the benefits paid by PSP, with the number of beneficiaries paid under each program, describing any difficulties faced by the PSP and / or the selected beneficiaries in using the digitized system. On a quarterly basis DSS will share the information with the MOSW, Bank and the local governments;
- Any time lags between placement of funds with PSP and actual payment;
- Number of beneficiaries who had to visit the local representative of the PSP more than once to collect the benefits;

Grievance Redress Mechanism

DSS will ensure that the GRM module in the MIS includes the information required to assess how effectively the procedure is working to address grievances and complaints. Grievance redress will follow the standards of resolution defined in the programs' Implementation Manuals prepared by DSS. The following information will be available in the MIS:

- Number of grievance applications the USWs entered into the MIS by using the Union Digital Center and other internet facilities available in the Union, with a brief description of the grievances;
- Number of grievances reviewed by the USSOs at the upazila level, with brief accounts of the findings, and decisions – in favor or against the complainants;
- Number of unresolved grievances reviewed by DDs at the district level, with brief accounts of the findings, and decisions - in favor or against the complainants;
- Number of unresolved cases forwarded to DSS, with a brief account of findings and decision;
- Number of cases at any level of review where the decisions were made in favor of the complainants.

DSS will extract the above information for the country as a whole, or for the districts and upazilas where the programs have been operational, so that they are available for reporting to stakeholders. Based on these information, DSS will also prepare updated reports for the Bank's Implementation Support Missions as and when they are undertaken.

11. Public Disclosure of SMF

The SMF is subject to the review of the World Bank *prior* to public disclosure. No provisions in the SMF may be amended, abrogated or suspended without the Bank's clearance. DSS will disclose Bangla translation of this SMF to the public in Bangladesh by posting it in its website (<http://www.dss.gov.bd/>), and authorize the World Bank to disclose it at its Country Office Information Center and in its Infoshop. DSS will also ensure that copies of the translated document are made available at its headquarters and at its District and Upazila offices; local government offices at Upazila, Union / Poursabha levels, and other places that are easily accessible by the general public. As to disclosure, DSS will inform the public through notification in two national newspapers (Bangla and English) about the SMF indicating where it could be accessed for review and comments.



SMALL ETHNIC COMMUNITY PLANNING FRAMEWORK (SECPF)

CASH TRANSFER MODERNIZATION (CTM) PROJECT

July 30, 2017

**DEPARTMENT OF SOCIAL SERVICES
MINISTRY OF SOCIAL WELFARE
BANGLADESH**

Table of Contents

Abbreviations.....	3
Executive Summary	4
1. Introduction	5
2. Defining The SEC People	5
3. The Background & Current Status	6
4. Scope of CTM Project.....	6
5. Social Implications of CTM & SECPF Objectives.....	7
6. SEC Engagement and Grievance Redress Mechanism.....	7
7. SECPF Implementation Arrangement	9
8. Monitoring & Documentation	9
9. Public Disclosure of SECPF	9

ABBREVIATIONS

BBS	Bangladesh Bureau of Statistics
BPO	Bangladesh Post Office
CHT	Chittagong Hill Tracts
CSO	Civil Society Organization
CTM	Cash Transfer Modernization
DD	Deputy Director (at district level)
DSS	Department of Social Services
GOB	Government of Bangladesh
GRM	Grievance Redress Mechanism
HIES	Household Income and Expenditure Survey
IDA	International Development Agency
IP	Indigenous Peoples
MIS	Management Information System
MOSW	Ministry of Social Welfare
NGO	Non-Government Organization
NHD	National Household Database
NSSS	National Social Security Study
OP	Operational Policy
OP 4.10	Operational Policy 4.10 on Indigenous Peoples
OP 4.12	Operational Policy 4.12 on Involuntary Resettlement
PD	Project Director
PS	Pourasabha
PMT	Proxy-Means-Test
PMU	Project Management Unit
SEC	Small Ethnic Community
SECPF	Small Ethnic Community Planning Framework
SMF	Social Management Framework
UDC	Union Digital Center
UP	Union Parishad
USSO	Upazila Social Services Officer
USW	Union Social Worker
UZP	Upazila Parishad
WB	World Bank

EXECUTIVE SUMMARY

Typical challenges in the implementation of cash transfer programs in Bangladesh include program fragmentation, lack of pro-poor targeting, administrative inefficiency and limited social accountability. Based on these rationales, the Cash Transfer Modernization (CTM) Project aims to work with the Old Age Allowance, the Widows' and Abandoned Women's Allowance (Widow Allowance), Disabilities Allowance and Disabled Students Stipends with the following aims of reform:

- c. Modernization of Beneficiary Selection and Management Systems; and
- d. Modernization of Beneficiary Payment Systems.

The CTM Project implemented by the Department of Social Services (DSS) under the Ministry of Social Welfare (MOSW), is aimed at improving transparency and efficiency of cash transfer programs for socioeconomically vulnerable people. It will do so by modernizing the existing beneficiary selection and payment systems in four existing cash transfer programs implemented by DSS targeted for poor and vulnerable individuals. Since the project is a nationwide initiative and interventions may cover areas inhabited by tribal people, the World Bank's Safeguard Policy OP/BP 4.10 on Indigenous People has been triggered, and DSS has prepared a Small Ethnic Community Planning Framework (SECPF).

This **Small Ethnic Community Planning Framework (SECPF)** contains the following guidelines that are expected to help mitigate social issues arising out of working in areas inhabited by SECs.

- Ensure that the selections and payments processes are consistent with those in the rest of the country and ethnicity does not influence any program process;
- Where necessary, carry out public information and communication campaigns and consultations in the local dialect;
- Enable participation of SECs, including poor men and women of vulnerable and marginalized groups, community elders, in consultations;
- Ensure that field staff are conversant with the local dialect to facilitate application and payment processes and grievance filing for SECs; and
- Plan so that factors like remoteness and dispersed populations in areas inhabited by SECs do not hinder program implementation or beneficiary services.

The SECPF is subject to the review of the World Bank *prior* to public disclosure. No provisions in the SECPF may be amended, abrogated or suspended without the Bank's clearance. DSS will disclose Bangla translation of this SECPF to the public in Bangladesh by posting it in its website (<http://www.dss.gov.bd/>), and authorize the World Bank to disclose it at its Country Office Information Center and in its Infoshop. DSS will also ensure that copies of the translated document are made available at its headquarters and at its District and Upazila offices; local government offices at Upazila, Union / Pourasabha levels, and other places that are easily accessible by the general public. As to disclosure, DSS will inform the public through notification in two national newspapers (Bangla and English) about the SECPF indicating where it could be accessed for review and comments.

1. Introduction

This Small Ethnic Community Planning Framework (SECPF -- previously Indigenous Peoples Planning Framework or IPPF)⁷ is prepared for the Cash Transfer Modernization (CTM) Project in order to deal with social issues that may concern people of small ethnic communities. The project is aimed at improving transparency and efficiency of social safety net cash transfer programs for socioeconomically vulnerable peoples, by modernizing the existing service delivery systems and practices. The Department of Social Services (DSS), under the Ministry of Social Welfare (MOSW), is preparing the project, and will implement it, with technical and financial support of the World Bank. As the four existing programs CTM plans to work with cover the entire country, including the districts inhabited by peoples of small ethnic communities, the project has triggered the Bank's social safeguard policy OP/BP 4.10 on Indigenous Peoples in compliance with its project financing policy. The SECPF outlines principles, policies, guidelines and the procedure to identify program implementation issues and potential risks and, if required, undertake measures to resolve them within the scope of the project.

Applicability of the OP 4.10 on Indigenous Peoples will generally depend on presence of the peoples of this particular small ethnic community in the Unions and Wards where social safety net beneficiaries would be selected and benefits delivered. In terms of spatial distribution, the largest proportion of the country's small population of SEC lives in the three districts of the Chittagong Hill Tracts (CHT): Bandarban, Rangamati and Khagrachari. These districts are also heavily populated by mainstream peoples especially after transmigration that started in the late 1970s. The rest of the SECs is dispersed in 25 districts in the plains where they generally live in physically separated settlements among the mainstream communities.

While safety net allowances will be administered on Union and Ward basis, it is highly unlikely that there are SEC-only unions or wards, barring very remote areas of CHT. Since the project covers all Unions across the country, DSS has decided to formally adopt this SECPF to address SEC issues and concerns in Unions and Wards that are also inhabited by peoples of this small ethnic community. *The proposed SECPF outlines principles, policies, guidelines and the procedure to identify program implementation issues and potential risks and, if required, undertake measures to resolve them within the scope of the project.*

2. Defining The SEC People

As SECs, who are described as Indigenous People in the Bank's OP 4.10, are found to live in varied and changing contexts, no single definition can adequately capture their diversity. As such, DSS will use the World Bank's guidelines to identify SECs in particular geographic areas by examining the following characteristics:

- Self-identification as members of a distinct SEC cultural group and recognition of this identity by others;
- Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;

⁷ Since the Government of Bangladesh terms indigenous people as a group of people belonging to the small ethnic community, it is decided that the 'indigenous' peoples in the Bank's operational policy should be referred to as peoples of Small Ethnic Community. But for all operational purposes this ethnic group fully corresponds to the definition of indigenous peoples given in the OP 4.10. In this document, SEC will always mean 'indigenous peoples', except where references are made to the Bank policy.

- Customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and,
- An indigenous or SEC language, often different from the official language of the country or region.

3. THE BACKGROUND & CURRENT STATUS

Bangladesh is one of the world's most populous countries. With per capita income of US\$1,409 in 2016, it is well above the lower middle income country category threshold which it crossed in FY14. Despite much progress, however, poverty and vulnerability remain great challenges, as a large number of people live below and around the poverty line and face various risks; thus a more robust social protection system is needed to address the challenges. The Government of Bangladesh has already recognized the aforementioned challenges and is preparing policies to effectively address these issues, as evidenced in the National Social Security Strategy (NSSS) 2015:

- *Program Fragmentation:* Bangladesh currently implements more than 140 social safety net programs through more than 20 ministries. It is recognized that there is an urgent need to consolidate the similar interventions and strengthen the major programs to rationalize program delivery.
- *Lack of Pro-Poor Targeting:* Presently, there are no scientific targeting mechanisms to identify the poor eligible for financial assistance. This led GOB and the Bank to agree that a unified targeting system that enables various programs to identify the households that are truly poor, can significantly improve accuracy of targeting and program efficiency.
- *Administrative challenges:* Monitoring and implementation of programs are affected by administrative challenges leading to problems with beneficiary selection and payment of benefits especially in case of food and also cash transfers. This has particularly negative impact on the elderly and persons with disabilities, whose direct access to service points like commercial banks becomes limited and the use of intermediaries becomes necessary.
- *Limited Social Accountability:* Lack of citizen engagement results in weak social accountability. Intended program beneficiaries, especially the elderly, widowed and persons-with-disabilities, often have limited awareness of the safety net programs and the procedures to enroll and receive the benefits. Grievance redress channels are seldom utilized due to lack of awareness, limited accessibility, fear of reprisal and perceptions of ineffectiveness.

4. SCOPE OF CTM PROJECT

The CTM project will essentially address the issues discussed above and carry out reforms in areas identified in the NSSS. The proposed reforms -- and other associated issues -- are embedded in the three components proposed under the project. The first two will be implemented by DSS and the third by BPO.

Component 1: Enhancement of Cash Transfer Programs: This will finance a portion of the expenditures under the Old Age Allowance, Widows Allowance, Disability Allowance and Disabled Students Stipend against the achievement of performance targets set to support modernization of these programs. Fiscal resources will be expanded and the benefit amount would be adjusted

based on a process to rationalize geographical distribution of resources, making them more equitable in terms of coverage.

Component 2: Modernization of Beneficiary Selection & Management Systems: This will provide support to (i) establish protocols for beneficiary selection and validation by integrating the DSS MIS with the National Household Database (NHD) being developed by the Bangladesh Bureau of Statistics (BBS), based on a Proxy-Means-Test (PMT) methodology. BBS has finalized the PMT formula based on the Household Income and Expenditure Survey (HIES) of 2010 which contains detailed information on nationally representative households' socioeconomic status, along with household characteristics. The targeting method will (i) determine "poverty score" of every household using NHD information⁸; (ii) select the most eligible of the beneficiaries based on the poverty score; and (iii) develop a fully digitized service delivery process which will include application, grievance redress and payment functions by integrating the DSS MIS with a payment service provider. This would allow for a demand-driven application process with objective selection criteria that would minimize manual interventions. The component would provide financing for necessary hardware and technical support, service fees, debit cards, training and other operating costs.

Component 3: Modernization of Beneficiary Payment Systems: This Component would provide technical assistance to BPO to support the enhancements of technology assets, utilize and build its infrastructure, pilot innovations, and strengthen the capacity of human resources.

5. Social Implications of CTM & SECPF Objectives

The project does not adversely affect any persons/households, including peoples who belong to the small ethnic communities. It is extremely unlikely that cash transfer in the form of safety net benefit would anyway be incompatible with tradition and culture of SECs. The main challenge is selecting the most eligible beneficiaries and making the payments by Payment Service Provider (PSP). In line with those for the project as a whole, the objectives of the proposed SECPF are as follows (in addition to the SMF objectives).

- Ensuring that program processes in areas inhabited by SECs are consistent with those in the rest of the country;
- Ensuring that ethnicity does not influence beneficiary selection decisions;
- Ensuring compliance with the relevant GOB policies and those of the World Bank on social safeguards and social inclusion issues, including those with gender implications.

6. SEC Engagement and Grievance Redress Mechanism

SEC participation and consultation is one of the most important activities undertaken wherever they are among the project beneficiaries. DSS has prepared the proposed SECPF based on a preliminary social assessment, with inputs from various studies, and field level observations and interviews with individuals and groups. Most recent consultations consisted of 7 meetings in Haluaghat upazila of Mymensingh in the plains, and 2 in Wagga and Chandraghona Unions of

⁸ Poverty Scoring is based on variables that are highly associated with the households' poverty status, and are observable and verifiable. The weights of the variables were determined based on their association with household welfare. BBS will conduct door-to-door census to collect key information including ownership of assets, labor market activities of household heads and other demographic information.

Kaptai upazila of Rangamati in the Chittagong Hill Tracts (CHT). The participants consisted of beneficiaries including SECs under the ongoing programs, as well as others who intend to be considered under the proposed programs.

Consultations with SECs (and mainstream communities), as well as the activities related to citizen engagement will continue throughout the project period, where necessary in local dialects for ease of understanding; in doing so, the project aims to make use of people with skills in local dialects. In addition, public information and communication campaign to raise awareness about eligibility and entitlements through the programs as well as operational reviews to collect beneficiary feedback besides other information will be carried out through outsourced services by DSS in all areas where CTM will be implemented, including areas inhabited by SECs.

It is widely observed that projects that are aimed at benefiting the poor and vulnerable tend to be prone to elite capture potentially depriving intended beneficiaries. In this context, it is expected that a strong, fully functional Grievance Redress Mechanism (GRM) is an important pre-requisite for effective implementation of such programs. It is thus decided that CTM project will have a much strengthened, easily accessible GRM to deal with grievances and complaints that may range from selection of beneficiaries to actual delivery of the benefits. This will potentially help minimize selection of non-poor, leakage of benefits, duplication of beneficiaries and other operational issues. A strong GRM will also enhance social accountability on the parts of those involved in supervision and monitoring of the programs. But it should be noted that GRM does not pre-empt an aggrieved person's right to go to courts of law.

In order to lodge and review grievances, CTM project will use the existing grievance redress module in the MIS of DSS. In this system, an aggrieved person willing to file a grievance will ask the Union Social Worker (USW) to enter it into the MIS using the Union Digital Center (UDC), or any other facility where internet and computer services are available in the Union. In addition to the facilities that already exist at the UDCs, CTM will equip USWs with devices to enable them to access the MIS. In addition to the MIS, a manual register would be maintained to avoid loss of data in cases of technical problems like poor internet connectivity, or problems with the MIS itself.

The USW's role is crucial to facilitate an aggrieved person's access to the internet and thus the MIS to lodge his or her complaint. It is important to note that the USW will enter all complainants into the system regardless of their merits. As an evidence that the complaint has been entered into the system, the USW will give the complainant a signed copy of the printout, or any other signed written evidence where internet connectivity is unavailable.

The USSO will review the grievances and complaints and try to resolve them. If not resolved, the USSO will forward them to the Deputy Director (DD) at the district level. If the DD is unable to resolve the grievances, the cases would be forwarded to DSS, where the final decision would be made. The time required by DSS to complete the redress process of grievances lodged at the union level will be a core indicator of CTM Project.

Depending on the nature, each complaint will be categorized at respective levels (field and/or central) and forwarded to the responsible agency: (i) BBS if the complaint is related to the aggrieved person's non-inclusion in the NHD which might have hampered his/her selection into or eligibility for the DSS programs; (ii) PSP or the responsible payment service provider if the complaint is regarding payments; (iii) DSS if the complaint is regarding the program delivery itself. A decision accepted by an aggrieved person at any level of review would be binding on the

persons / agencies who have caused the grievance. Many areas inhabited by SECs as well as coastal populations are remote and in the event that there are challenges to internet connectivity, the manual grievance register would be a critical contingency measure to ensure that the GRM process is active.

7. SECPF Implementation Arrangement

Using the same implementation arrangements as the SMF, through the USSO, DSS will ensure that places inhabited by SECs:

- Have the option of disseminating project information as well as conducting beneficiary consultations and interviews in the local dialect;
- Are deployed with field staff who are familiar to local dialects to facilitate application processes and grievance filing for SECs;
- Have selections and payments processes consistent with those in the rest of the country i.e. eligibility screening by MIS using NHD data, followed by poverty ranked selection of the poorest beneficiaries based on resource availability; and poverty ranked waitlist of beneficiaries. The selection process will undergo no adjustments based on ethnicity or any consideration other than (i). poverty data; and (ii). resource availability.
- Enable participation of SECs, including poor men and women of vulnerable and marginalized groups, community elders, in consultations;
- Have appropriate contingency planning given the remoteness of many areas and widely dispersed settlements, especially in the CHT; so that selection, enrolment and payments can continue seamlessly.

8. Monitoring & Documentation

As noted in the SMF, the DSS MIS would be central to information flow in CTM and therefore, all data regarding applications, beneficiary lists (approved, rejected, eligible, ineligible and waitlists), payments and grievances would be stored in the MIS and available for reporting to stakeholders. However, the NHD and the application forms of the four programs do not include data on ethnicity which would make it impossible to track data separately for SECs, using beneficiary information. However, the Operational Review service provider will provide feedback on the implementation status of the SECF and what steps were taken to ensure participation of SECs in the programs using the following indicators using a representative sample:

- Percentage of beneficiaries, by program, who belong to SECs
- Comparison between distance travelled and cost incurred by beneficiaries in SECs with those of other regions

9. Public Disclosure of SECPF

The SECPF is subject to the review of the World Bank *prior* to public disclosure. No provisions in the SECPF may be amended, abrogated or suspended without the Bank's clearance. DSS will disclose Bangla translation of this SECPF to the public in Bangladesh by posting it in its website (<http://www.dss.gov.bd/>), and authorize the World Bank to disclose it at its Country Office

Information Center and in its Infoshop. DSS will also ensure that copies of the translated document are made available at its headquarters and at its District and Upazila offices; local government offices at Upazila, Union / Pourasabha levels, and other places that are easily accessible by the general public. As to disclosure, DSS will inform the public through notification in two national newspapers (Bangla and English) about the SECPF indicating where it could be accessed for review and comments.