
TRANSFORMING SECONDARY EDUCATION FOR RESULTS PROGRAM

Government of the People's Republic of Bangladesh

PROGRAM FOR RESULTS

Draft Environmental and Social System Assessment (ESSA)

APRIL 2017

ACRONYMS AND ABBREVIATIONS

ADB	- Asian Development Bank
CHT	- Chittagong Hill Tract
DLI	- Disbursement-linked indicator
DoE	- Department of Environment
DPHE	- Department of Public Health Engineering
DSHE	- Directorate of Secondary and Higher Education
EA	- Environmental Assessment
ECA	- Environmental Conservation Act
ECC	- Environmental Clearance Certificate
ECR	- Environment Conservation Rules
ESSA	- Environmental and Social Systems Assessment
GoB	- Government of Bangladesh
MoE	- Ministry of Education
PAP	- Program Action Plan
PDO	- Program Development Objective
PforR	- Program-for-Results
SEQAEP	- Secondary Education School Quality and Access Enhancement Project
WB	- World Bank
WHO	- World Health Organization
WSS	- Water Supply and Sanitation

Bangla Term

Upazila	- Sub-district administrative area
Upazila Parishad	- Sub-district administrative unit

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ACRONYMS AND ABBREVIATIONS

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EXECUTIVE SUMMARY

The Government's Secondary Education Development Program (SEDP) will be implemented over the course of five years from the financial year (FY) 2017/18 to FY 2021/22, and it will cover grades 6-12, annually supporting more than 12 million students and 357,000 teachers from more than 20,300 general schools and, 9,400 madrasahs. The proposed Program Development Objective is to improve student outcomes in secondary education and the effectiveness of the secondary education system (Student outcomes refer to enrolment, retention, completion and learning levels). The proposed operation consists of two components: (i) a Program for Results (PforR) component to support the government's harmonized secondary education sector program; (ii) a Technical Assistance Facility component that aims to strengthen the capacity of Ministry of Education (MOE) and other implementing agencies and provide support facility for achieving the results in the priority areas.

The Environmental and Social Systems Assessment (ESSA) provides a comprehensive review of relevant government systems and procedures that address environmental and social issues associated with the Program. The ESSA describes the extent to which the government environmental and social policies, legislations, program procedures and institutional systems are consistent with the six 'core principles' of the World Bank's Policy for PforR Financing and recommends actions to address the gaps and to enhance performance during Program implementation.

The assessment team used various approaches to review the environment and social systems that are relevant to Secondary Education Sector Program. It included analysis of information/ data on previous assessments and reports on the status of different aspects of its management of environmental and social issues (e.g. access to safe water and sanitation, access to education by vulnerable groups) and national consultations with all key stakeholders related to secondary education.

The ESSA identified the potential risks, opportunities and analyzed the compatibility of the program with respect to the Core principles. Overall, the ESSA recommends that the National Environmental and Social systems are acceptable for the Program implementation and adopting the PforR investment lending. The ESSA finds that there are adequate legal provisions to safeguard against adverse impacts of pollution activities due to civil construction (Environment conservation Act 1995, ECR 1997) and adequate guidelines and manuals are available for the procedures of providing safe water supply and sanitation in school facilities. An EMF and Environmental Assessment and Risk Framework (EARF) were developed by DSHE for SEQAEP funded by World Bank and SESIP funded by ADB respectively. The EMF and EARF outlines the environmental safeguard activities necessary regarding installation of tube wells and sanitation facility in the school premises. DSHE has hired consultants to oversee the safeguard activities who have been providing monitoring reports on implementation of EMF and EARF. However, the ESSA has identified gaps in the implementation of the EMF and EARF owing to inadequate staff with technical capacity to supervise implementation of environment and social risk management measures at both the field and central level. ESSA recommends addressing these institutional capacity constraints and gaps in environmental and social management system. The measures for improvement of the environmental and social management system (ESMS) have been discussed with the implementing agencies and have been incorporated in the Program Action Plan.

Measures to strengthen system performance for environmental and social management

Objective	Measures
Environmental systems management:	
Strengthen institutional capacity and compliance regarding civil works	<ul style="list-style-type: none"> The current EARF developed by MoE is adequate to address environmental safeguard issues associated with small-scale civil works for the proposed PforR. However, recent assessment suggests that there are gaps in implementation of various environmental safeguard related issues during construction phase of subprojects. The incorporation of site-specific EMP in the Contractor's bidding documents must be made by EED. There needs to also be enhanced monitoring/supervision of the implementation of the works to ensure the EMPs are followed. Currently there is no maintenance policy for civil works in DSHE. Although the program will support the establishment of a 5-year need based infrastructure development plan, it is essential that a maintenance policy be also in place. Development and approval of a maintenance policy can be suggested as an action under the Program.
Strengthen institutional capacity and compliance regarding provision of safe water supply and sanitation	<p>Several gaps in EMF implementation identified over past assessments should be addressed by strengthening institutional capacity for environmental compliance and oversight. These areas are the following:</p> <ul style="list-style-type: none"> All tube wells should be screened annually and interventions should be taken at schools where the tube wells have been found damaged/choked up. Government's program should have a provision of testing arsenic in every institution's water facilities. Replace all arsenic contaminated tube well and take necessary action for mitigation as per Bangladesh National Policy for Arsenic Mitigation, 2004. For existing sanitation facilities, the drainage systems need to be improved to prevent waterlogging. This may be included in the maintenance policy of civil works. For existing tube wells, the drainage system needs to be improved to prevent waterlogging. This may also be included in the maintenance policy of civil works. For working tube wells with damaged bases, interventions should be made to repair and prevent contamination. This is to be included in the maintenance policy of civil works. As per standard practice, hand washing facilities should be available at all latrines and in proper working conditions. Provisions for menstrual hygiene management should be made in schools. It should be ensured that for new installations of either tube wells or latrines, the minimum safe distance between the two should be maintained as per standard practice. For existing facilities where the standards have not been made, the tube well water should be continuously screened for bacterial contamination and adequate water treatment (filtering, chlorination) should be adopted where water has been found to be bacteriologically contaminated.

	A compliance criteria for school sanitation facility grant can be proposed for maintaining good practices of maintaining tube wells and latrines.
Additional Monitoring	All tube wells need to be screened for bacteriological contamination each year.
Hygiene promotion in all schools	The hygiene best practices should be made an integral part of the curricula. Appropriate set of hygiene promotion materials should be provided to the schools and their progress in this regard should be monitored.
Budget Allocation	Budgetary provisions for monitoring should be increased to include arsenic/manganese screening of all tube wells, mitigation of arsenic from existing tube wells and testing for bacterial contamination of existing tube wells. There should also be budgetary allocation for environmental due diligence and monitoring for civil construction and rehabilitation works.
Preparation of Environmental Safeguards operation plan	With so many multiple players involved with implementation, it is important to ensure that the environmental compliance and supervision is coordinated by one agency under MoE. It is recommended that DSHE Planning division supported by Program Support Unit (PSU) will be taking the lead role to ensure environmental safeguards monitoring and supervision of the program. The basic principles of the previous safeguard document (EMF and EARF) needs to be integrated into the operational plan of the new Program. It is recommended that the PSU prepare a safeguards operational plan taking into consideration the mitigation measures, guidelines and monitoring protocols of the EMF and EARF. It has been assessed that the PSU does not have sufficient technical capacity for managing environmental safeguard issues. Therefore, capacity building of the PSU (dedicated focal person for environmental safeguards) needs to be done.
General Awareness	Local USEOs, UAS, SMCs, PTA need to raise awareness within the community and schools. As a departure point, the program can arrange awareness trainings and workshops at the field level from time to time. As a suggestion of frequency, 1 workshops/training can be arranged every six month.
Social Systems Management:	
In this program MoE is the legal and regulatory authority to commit resources and implement actions for social management. As number of ministries is being involved, an Inter-ministerial Program steering Committee (IPSC) would work to tie the loose ends involving actions of various ministries on the program. The experience of working with IDA and other NGOs through SEQAEP and SEQAEP AF would be a great asset in this regard. However, shortage of adequate competent staffs and ad-hoc organizational set up to implement the program are major weaknesses within MoE. The program has inbuilt screening of environmental and social effects in the program design and relevant stakeholders including IDA have been consulted from the initiation of the program.	

Strengthen Institutional Capacity for updating Secondary Educational Curriculum	The experience of SEQAEAP has given MoE enough experience and scopes for developing institutional strength in handling nationwide educational program. However, inadequate and qualified staffs remain to be a problem that has been identified by MoE and needs to be addressed effectively. The National Curriculum Policy Framework (NCPF) meant to revise and update secondary education under curriculum MoE have to be made effective by year 1 of the Program. This will demand NCTB to be restructured with additional competent staffs to take on the task of revising and implementing curriculum for grades 6-10 by the end of the 5 th year (including dissemination of curriculum, distribution of textbooks and evidence of schools offering differentiated subjects).
Social safeguards Implementation	Though there are adequate implementation arrangements made by MoE at the macro and micro level, yet SEDP needs a dedicated social safeguards implementation mechanism. While DSHE with its DG as Program Director and PCU and PSU are established to coordinate and implement various responsibilities, it is imperative that some focal point is established to monitor social safeguard issues. It should be adequately staffed and resourced so to work effectively at the micro level and provide inputs at the macro level.
Coordination amongst various ministries	<p>MoE has developed IPSC to oversee the coordination and monitoring of SEDP. Chaired by the Secretary, SHED, it will need to work at the macro level and communicate the harmonized decisions at the micro level to various GoB entities working under different ministries and elected representatives at the District, Upazila, and management committees at the schools and colleges. MoE can initiate IEC on the benefits of the SEDP in coordination with Ministry of Information (MoI), Ministry of Home Affairs (MoHA) and Ministry Public Administration (MoPA) as was done by MoHFW by forming Gender, Equality, Voice and Accountability (GEVA) structure to harmonize inter-ministerial matters effectively. The print and electronic media should also be utilized. Civil societies should promote secondary education for all and voice against Eve Teasing. MoE should undertake effective and sustained IEC in the community including the TP areas. Press Information Department of the Ministry of Information could conduct street drama and air related program in Bangladesh Betar and local FM Radio to communicate importance of girls' access to secondary education. Signage of the program may be displayed at the appropriate places around the school/college. Leaflets and banners should be distributed and displayed in the urban slums and hard-to-reach areas.</p> <p>District and Upazila Law and Order Situation Review Committees may be given specific responsibilities to ensure safety and security of adolescent girls through mobilizing the society and using the law enforcing agencies. At times, Mobile Courts may be run by the administration to punish the eve teasers in situ.</p>

Integrating Local Leadership/leadership at the Micro level	<p>District Parishad Chairman and Upazila Parishad Chairmen, Union parishad Chairmen and members being people's representatives should be taken on board in furthering access of adolescent girls, particularly from the pro-poor households including VG and TP in secondary education. Local leadership has a very important role in developing people's perception to GoB/MoE run program. MoE/DSHE should use PCU to coordinate with Zonal Education Office (ZEO), district Education Office (DEO) and Upazila Secondary Education Office (USEO) to integrate local political and apolitical leadership with the SEDP. Local leadership in coordination with DSEO/ISEO, Management committees, Institutional heads etc. can work on the awareness program addressing areas namely drawback of early marriage, eve teasing, gender empowerment and importance of girls' education.</p> <p>Local leadership/local administration may be requested to educate the parents about access to secondary education by girls and its social benefits in the TP inhabited areas.</p>
Inclusion of representatives from all clusters in forming different Bodies	<p>There has to be inclusion of relevant stakeholders and the VG/TP representatives in the social management process. The appropriate framework has to be developed at the micro level by MoE/DSHE and communicated to all concerned.</p> <p>The School/College Management Committee must be organized by including personalities from mainstream population, TP representatives, women, community elders, students etc. All the discussions must be free, audience should be well informed and their prior consent should be taken while decisions are taken.</p> <p>Community Procurement method should be strictly followed while spending fund allotted to the school/college.</p> <p>Local community may arrange common transportation system for adolescent students using local transports (Bus, Motorized or RikshawVan, Boat etc.). This way girls undertaking secondary education can move together safely at low cost, while averting harassment.</p>
Systems for information disclosure and stakeholder consultation	Grants for social audit are included in the Program. The school-level social audit report provides public information on school performance and accountability. The MoE will use its existing citizen engagement mechanisms, including social audits to seek feedback and continue with stakeholder consultations on mainstreaming GEVA and social inclusion activities.
Budget	The MoE will ensure that sufficient budgets for social safeguards are allocated to the institutions for procurement following community procurement method.

<p>Social Safeguards Monitoring, Developing Consciousness amongst the population in favor of Secondary education.</p>	<p>MoE to develop effective means to monitor social safeguard issues up to Upazila level. Effective arrangements to be made to educate the teachers/management committees about gender sensitivity, cultural diversity and accommodation of the special needs of the adolescent girls from the TP community pursuing secondary education. DSHE Planning Division supported by Program Support Unit (PSU) could be advised to take the lead role to ensure social safeguards monitoring and supervision of the program. This can be recommended as a PAP action.</p> <p>The society, particularly the conscious citizenry should be encouraged to conduct seminar, symposium etc. for developing consensus against child labor, child marriage, dowry, early motherhood and alike. They should also unite people in favor of completion of secondary education by the girls of all walks of life for a just and fair society.</p>
<p>Adolescent Girls' Program</p>	<p>The proposed program plans to work towards improving (i) inclusion of adolescent health in curriculum; (ii) promotion of menstrual hygiene with disposal facilities; (iii) awareness raising for students, teachers, and community; (iv) formation of school-based girls committees supported by female guardian teacher; and (v) introduction of student and peer counseling. The adolescent girls program is expected to maximize social impact to the beneficiaries and therefore will need to be carefully designed and rolled out to at least two divisions by Year 3 of the program (proposed as a DLI) and all divisions by Year 5.</p> <p>The program supports mainstreaming students with special needs. The harmonized stipends program will support all students with special needs. The program will support training to SMCs on inclusive education. In addition, disabled access friendly toilets/ sanitation facilities will be supported by the program.</p>
<p>Allocating resources for Adolescents with Special Needs</p>	<p>There are a significant number of children in Bangladesh with special needs (e.g. children with slow mental growth, autism etc.). While the physically disabled students could be merged with the mainstream students, students with mental disability would need specialized schools. The Program should work with the National Academy for Autism and Neuro-developmental Disabilities (NAAND), a project under DSHE that work with the aim of making the children with special needs self-reliant and capable to integrate to the mainstream society. Together with NAAND and other stakeholders, GoB should explore how the Program's resources may be utilized for strengthening the activities for adolescents with special needs.</p>

SECTION I: BACKGROUND

1.1 Introduction and Context

1. As Bangladesh aspires to move up the value chain and become a middle-income country (MIC), there has to be significant gains in quality and relevance of skills imparted by the secondary education system (both for higher level of education and better jobs in an expanding workforce). Each year, 1.3 million youth join the labor market, but in the face of what is required for the country to reach MIC status, the current composition of the labor force is inadequate. It is under-educated – less than 25% of the 57 million workers in the domestic labor market have secondary education – and 89% of workers are in the informal market. To foster skills-led economic growth via diversification of economic activities, increasing the pool of medium- to high-skilled workforce is critical.
2. A decade ago, in 2005, World Bank's engagement in the Bangladesh education portfolio focused primarily on increasing access to primary and secondary schools and innovations to improve the quality of school education. Over the past decade, the Bank has supported second-generation reform programs in primary and secondary education, and responded to client demand for post-secondary education—higher education and skills development. The Bank's support in secondary education started with the pioneering female secondary school stipends programs (1993-1999, 2002-2007) that have resulted in dramatic increase in girls' enrolment in the sub-sector. Building on the earlier successful secondary education female stipends projects that have helped achieve gender parity at secondary level, the current Bank financed Secondary Education Quality and Access Enhancement Project (SEQAEP: 2008-2017, IDA US\$396 million) introduced a second-generation stipends program where the former gender-targeted stipend scheme was revised as poverty-targeted stipends – using the Proxy Means Testing (PMT) selection method - to target the neediest group of children for improving their access to and retention in secondary education and currently benefits 2 million students annually. Importantly, SEQAEP has also piloted a number of innovative quality improvement interventions. These include: (i) provision of books, facilitators and technical support to schools to enhance reading habit and skills, currently benefiting more than 2 million student readers in 12,000 secondary institutions; (ii) provision of additional teachers in English, mathematics and science in 1500 targeted schools; and (iii) provision of performance-based incentives/grants to students, teachers and schools covering 12,000 secondary institutions. These three pilots have gone through refinements during the project period and have the potential for expansion nationally¹. SEQAEP project's geographic coverage has been limited to less than half of the country's geography and interventions have been largely on access and less on large-scale quality enhancement or on sub-sector's system delivery and efficiency in the absence of a common sector program.
3. As a result, despite remarkable achievements in gender parity in secondary education level through a combination of supply side (in terms of increased number of schools and teachers) and demand-side (female stipends program), continued partnership between the Government and non-government providers, subsequent move towards a pro-poor targeting and

¹ Additional Teachers in English, mathematics and science pilot and developing the reading habit pilot are being impact-evaluated and the findings are expected to be available by end of this calendar year.

piloting of quality enhancing interventions, much remains to be done on student learning and system strengthening at this sub-sector.

4. The proposed Program is well aligned with the World Bank Group's Country Partnership Framework (FY2016–2020). Specifically, the Program supports the Country Partnership Framework objective 2.1, which focuses on improved equity in access, quality, and relevance in education. Consistent with the National Education Policy (2010), the Seventh Five Year Plan (2016-20) and Sustainable Development Goals 4, the proposed program will focus on quality and results. The proposed program also draws upon lessons learned from the World Bank's engagement in the country's education programs but also on the recommendations provided in the most recent analytical sector work carried out by the Bank "Education Sector Review - Seeding Fertile Ground: Education That Works for Bangladesh (ESR 2013)" and strategic goals described in the draft Bangladesh Education Strategy Note (2016).

5. The proposed sector program through a Program-for-Results (PforR) modality would be an opportunity to bring all the to-date parallel project activities by various Development Partners into an integrated implementation and policy structure. The Bank's positive experience in the primary education sector wide approach through a DLI-based IPF instrument will be a value-added engagement as the Bank supports the design and implementation of the secondary sector program.

1.2 The Scope of ESSA

6. The ESSA provides a comprehensive review of relevant government systems and procedures that address environmental and social issues associated with the Program. The ESSA describes the extent to which the government environmental and social policies, legislations, program procedures and institutional systems are consistent with the six 'core principles' of the World Bank's Policy for PforR Financing and recommends actions to address the gaps and to enhance performance during Program implementation.

- **Core Principle 1:** General Principle of Environmental and Social Management. This core principle aims to promote environmental and social sustainability in Program design; avoid, minimize, or mitigate adverse impacts, and promote informed decision-making relating to the Program's environmental and social impacts.
- **Core Principle 2:** Natural Habitats and Physical Cultural Resources. This core principle aims to avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program.
- **Core Principle 3:** Public and Worker Safety. This core principles aims to protect public and worker safety against the potential risks associated with: (i) construction and/or operation of facilities or other operational practices under the Program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.
- **Core Principle 4:** Land Acquisition. This core principle aims to manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist affected people in improving, or at the minimum restoring, their livelihoods and living standards.
- **Core Principle 5:** Small Ethnic and Vulnerable Communities (a terminology used by the GOB as it does not use the term "Indigenous Peoples"). This core principle aims to give due consideration to the cultural appropriateness of, and equitable access to, Program

benefits, giving special attention to the rights and interests of the small ethnic and vulnerable communities (tribal people) and to the needs or concerns of vulnerable groups.

- **Core Principle 6:** Social Conflict. This core principle aims to avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

7. Specific objectives of ESSA are as follows:

- To review the existing policy and legal framework of Bangladesh related to management of environmental and social impacts of the Program interventions
- To assess the capacity of MoE/DSHE/EED for environmental and social impact management within the Program system
- To assess the Program system performance with respect to the core principles of the PforR instrument and identify gaps in the Program's performance
- To include assessment of monitoring and evaluation systems for environment and social issues
- To describe actions to fill the gaps that will input into the Program Action Plan (PAP) in order to strengthen the Program's performance with respect to the core principles of the PforR instrument

1.3 Approach to ESSA

8. The assessment team used various approaches to review the environment and social systems that are relevant to Secondary Education Sector Program. It included analysis of information/ data on previous assessments and reports on the status of different aspects of its management of environmental and social issues (e.g. access to safe water and sanitation, access to education by vulnerable groups) and national consultations with all key stakeholders related to secondary education.

9. The data gathered from these multiple sources were processed to allow for triangulation. National level consultations are to be organized with stakeholders for feedback on the implementation of provisions to enhance transparency and accountability and other related environment and social issues.

10. The ESSA reviews the proposed Program activities to evaluate its effects on the environment and potentially affected people. Risks identified through the ESSA will be addressed through the results area, KPIs or through DLIs whichever is most feasible. If required, this operation will consider safeguards risk mitigation measures in the PAP and/or identify opportunities to improve systemic implementation and strengthen institutional capacity through the IPF TA component.

SECTION II: PROGRAM DESCRIPTION

2.1 Program Development Objectives of the Proposed Program

11. The proposed Program Development Objective is to improve student outcomes in secondary education and the effectiveness of the secondary education system. (Student outcomes refer to enrolment, retention, completion and learning levels).

12. The Government's Secondary Education Development Program (SEDP) will be implemented over the course of five years from the financial year (FY) 2017/18 to FY 2021/22, and it will cover grades 6-12, annually supporting more than 12 million students and 357,000 teachers from more than 20,300 general schools and 9,400 madrasahs. SEDP spans the entire activities of Ministry of Education (MoE) excluding those for higher education (post grade 12), technical and vocational education and training under the Directorate of Technical Education (DTE) and Bangladesh Technical Education Board (BTEB). The Program scope is in table 1.

Table 1. Program Scope

Item	Government Program	Program Supported by WB PforR
Title	Secondary Education Development Program (SEDP)	Transforming Secondary Education for Results (TSER)
Implementation Period	FY2017/18–FY2022/23	FY2017/18–FY2022/23
Geographic scope	Nationwide	Nationwide
Objective	Purpose: A more efficient, equitable and quality secondary education system.	PDO: to improve student outcomes in secondary education and the effectiveness of the secondary education system.
Activities or outputs	<ul style="list-style-type: none"> • Covers 6-12 grades (Grade 6-8 junior secondary until it is phased out to basic level) and secondary education (Grades 9-12) in general schools, Madrasahs and school-based technical and vocation institutions. • Finances both the revenue and capital expenditures • Program Results areas are Improving Quality (curriculum reforms, teacher professional development, teaching-learning in Bangla, English, Mathematics and Science; assessments and examinations reforms; ICT; pre-vocational education; teacher management and accountability; and school management and accountability); Access and Retention (infrastructure; poverty-targeted stipends program; adolescent girls program) and Education management and governance (sector planning, institutional capacity, decentralized management, EMIS, M&E, and fiduciary). 	<ul style="list-style-type: none"> • Coverage would be same as the Government's Program • Excludes large-scale civil works (including school construction) managed by EED, textbooks production and purchase of ICT assets and equipment requiring ICB. • These three categories do not provide any value-added from the World Bank (textbook production has been managed well by the Government), or are managed by agencies outside of DSHE (EED in the case of civil works and ICT Division in the case of purchase of ICT equipment)
Financial Management	Uses country system; Expenditures will be pre financed by GoB through treasury system and non development budget; Audit conducted as per OCAG's mandate	Uses Country system; Funds flow to Treasury; Annual Audit Required
Procurement method and approval	Uses country system; PPA/PPR shall apply subject to any exceptions	Uses Country system No prior or post-review required
Program expenditure	US\$18.8 billion	Tentative US\$15.18 billion
Financiers	GOB, World Bank, ADB and other development partners	GOB, World Bank, ADB

13. The Program is clustered around three SEDP results areas: (a) Enhanced quality and relevance of secondary education; (b) Increased equitable access and retention to secondary education; and (c) Strengthened governance, management and administration. A subset of the SEDP interventions, outputs, and outcome across the three results areas is chosen as the DLIs.

Table 2. Results Areas and DLIs

Results Area	Potential DLIs
Results Area 1: Enhanced quality of secondary education	1. Effective and relevant curriculum in place 2. A national assessment and examination quality assurance system in place 3. Improved teaching/learning in Bangla, English, Mathematics and Science 4. Improved teacher management and accountability 5. Improved secondary level institution management accountability
Results Area 2: Improved equitable access and retention	6. Improved grade retention and cycle completion for disadvantaged students and for girls
Results Area 3: Strengthened governance and management	7. Institutional capacity strengthened 8. Enhanced fiduciary management and Data Systems

Program Financing

14. SEDP will be financed primarily from Government sources, with support from development partners, including the World Bank and ADB. (The World Bank US\$490 million for PforR and ADB US\$225 million).

Implementation Arrangements

15. SEQAEP and SEQAEP AF's effective implementation is a milestone achievement of MoE along with IDA and other development partners. The SEDP due to be implemented from FY 2017/18 to FY 2021/22 will use the government system for program implementation, oversight, financial management (FM), procurement, safeguards, monitoring and evaluation (M&E), and reporting arrangements. The MOE/Secondary and Higher Education Division will serve as the executing agency (EA) and will have overall responsibility for policy guidance, coordination and oversight for program implementation. A Program Coordination Unit (PCU) headed by Additional Secretary will be established under the MOE/Secondary and Higher Education Division, with representatives from the Technical Education and Madrasah Division. DSHE is the main implementing agency and will be responsible for overall implementation and coordination of the SEDP activities across the DSHE and other implementing agencies. An Inter-ministerial Program Steering Committee (IPSC) will be established to oversee the coordination, monitoring, and implementation of the SESDP. A Program Coordination Unit (PCU) headed by Additional Secretary (Development-MOE) will be established under the MOE/Secondary and Higher Education Division, with representatives from the Technical Education and Madrasah Division. It will mainly be responsible for: (a) coordinating the preparation of an integrated Annual Operation Plan (AOP), including budget covering program and activities of DSHE and other associated implementing agencies (AIA) or co-implementing agencies (CIA)² under MOE; (b) coordinating all development partner financing in secondary education; (c) conducting annual reviews on program progress; and (d) reporting to the Inter-Ministerial Program Steering Committee. This unit will be headed by the Additional Secretary, and include two deputed staff, and two consultants.

² ADB's SESIP program uses the word co-implementing agency (CIA) where as for the purpose of PforR, they will be considered as central/regional associated implementing agencies (AIA).

16. DSHE with DG DSHE as a Program Director be the main implementing agency (IA) and primarily responsible for: (a) planning, budgeting, program implementation and monitoring and evaluation, with support of AIA/CIA; (b) supporting AIA/CIA in program activities delivery at the field level; and (c) undertaking procurement and financial management. The SESDP Implementing Committee (IC), with representation from the Madrasah Board and the Madrasah Education Directorate under the DSHE will be responsible for overall implementation and coordination of the SESDP activities across the DSHE and AIA/CIA. Zonal Offices, District Education Offices, and Upazila Secondary Education Offices (USEOs) will execute the program at field level and report to the DSHE. The USEOs will support SMC/MMC/Governing body and PTA in carrying out school-level activities. In addition, DSHE capacity will be strengthened to deliver results by mobilizing implementing partners including the Directorate of Public Health Engineering, LGED, Commercial Banks, implementing agencies which promote reading habit (e.g. BSK, Room to Read), and Universities.

17. The Budget and Finance Committee under the Ministry of Finance, Finance Division, will be established and will review quarterly progress on expenditures and DLIs and ensure adequate resource allocation and timely funds release. The Controller General of Accounts (CGA) is responsible for maintaining the program accounts and reporting through the iBAS, and strengthening field level capacity in financial accounting and reporting. Program Audit responsibility lies with the Office of the Comptroller and Auditor General (OCAG), which will appoint an appropriate Directorate for the purpose as per existing country regulations.

SECTION III: POLICY AND REGULATORY FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

18. This section describes the existing environmental and social management system of the GOB along with an overview of the policy and legal framework. This includes a profile of the key institutions and their role with respect to management of environmental and social aspects of the Program.

3.1 Policy and Legal Framework

19. Bangladesh has a number of policies, instruments and laws that support environmental and social management and the environmental and social assessment processes. The ESSA reviewed the existing regulations and policies, their legal and practical applicability at the program level as well as the institutional capacity, and the effectiveness of implementation in practice. GoB has enacted various acts and regulations relating to clean environment, public health protection, and health care waste management.

3.1.1 Policy and Legal Framework for Environmental Safeguard

20. The GOB's environmental laws and policies are deemed adequate for both protection and conservation of resources, although enforcement capacity needs to be improved significantly.

National Environmental Policy 1992

21. The concept of environmental protection through national efforts was first recognized and declared in Bangladesh with the adoption of the Environment Policy, 1992 and the Environment Action Plan, 1992. The major objectives of Environmental policy are to i) maintain ecological balance and overall development through protection and improvement of the environment; ii) protect country against natural disaster; iii) identify and regulate activities, which pollute and degrade the environment; iv) ensure environmentally sound development in all sectors; v) ensure sustainable, long term and environmentally sound base of natural resources; and vi) actively remain associate with all international environmental initiatives to the maximum possible extent.

Bangladesh Environmental Conservation Act (ECA), 1995 amended 2002

22. This umbrella Act includes laws for conservation of the environment, improvement of environmental standards, and control and mitigation of environmental pollution. It is currently the main legislative framework document relating to environmental protection in Bangladesh, which repealed the earlier Environment Pollution Control ordinance of 1977. The first sets of rules to implement the provisions of the Act were promulgated in 1997 (see below: "Environmental Conservation Rules 1997"). The Department of Environment (DoE) implements the Act. A Director General (DG) heads DoE.

Environment Conservation Rules (ECR) 1997 amended 2003

23. These are the first set of rules, promulgated under the environment conservation act 1995. Among other things, these rules set (i) the national environmental quality standards for ambient air, various types of water, industrial effluent, emission, noise, vehicular exhaust etc.,

(ii) requirement for and procedures to obtain environmental clearance, and (iii) requirements for IEE/EIA according to categories of industrial and other development interventions. Any proponent planning to set up or operate an industrial project is required to obtain an "environmental clearance certificate" from the department of environment (DoE), under the environment conservation act 1995 amended in 2002. ECR 1997 contains the drinking water quality standards which needs to be maintained while providing water supply in the schools. Also the expansion of structures may require environmental clearance from the DoE, the procedures and formalities of which are delineated in the ECR 1997. Under the ECR, projects are classified as 'Green', 'Orange A', 'Orange B', and 'Red' to determine the level of environmental assessment required.

24. Construction of multi-storied buildings is considered as 'Orange B' category in ECR, 1997. However, there is no fixed definition of a multi-storied building. In practice, a building of more than 10 stories within Dhaka City (as per building construction rules of RAJUK) and a building of more than 6 stories outside of Dhaka city will be considered as 'Orange B' category. It is expected that the primary schools outside of Dhaka will not be more than 6 stories and as such, no environmental clearance will be required. If a new construction of more than 6 stories is considered, IEE and EMP would be required to get the environmental clearance from DOE as per ECR, 1997.

Environment court act, 2000

25. The aim and objective of the act is to materialize the environmental conservation act, 1995 through judicial activities. This act established environmental courts (one or more in every division), set the jurisdiction of the courts, and outlined the procedure of activities and power of the courts, right of entry for judicial inspection and for appeal as well as the constitution of appeal court.

Bangladesh labor act, 2006

26. This act pertains to the occupational rights and safety of factory workers and the provision of a comfortable work environment and reasonable working conditions. In the chapter vi of this law safety precaution regarding explosive or inflammable dust/ gas, protection of eyes, protection against fire, works with cranes and other lifting machinery, lifting of excessive weights are described. And in chapter viii, provision of safety measures like appliances of first aid, maintenance of safety record book, rooms for children, housing facilities, medical care, group insurance etc. Are illustrated. This act will be applicable for construction workers engaged in civil work related activities associated with expansion of school infrastructures.

Safe drinking water supply and sanitation policy 1998

27. The policy calls for nationwide access to safe drinking water and sanitation services at an affordable cost. The objective is to improve public health and produce a safer environment by reducing water-borne disease and contamination of surface water and groundwater. Government will encourage increased user participation, including the active support and involvement of other partners, such as NGOs, market-oriented business organizations and similar private organizations in water and sanitation development. The key objectives of the policy are: (i) to ensure proper storage, management and use of surface water and preventing its contamination; (ii) emphasis on the use of surface water over ground water. According to the policy, it is desirable that water supply and sanitation works are considered within broader environmental

considerations. The program activities of the proposed PforR will consider the above policy during operational period in various upazilas

National water policy

28. The objectives of national water policy are: (i) to facilitate availability of safe and affordable drinking water, (ii) to reduce or prevent the pollution of the groundwater by fertilizer (phosphorous and nitrogen) and biocides, (iii) prevention of fecal pollution of the aquifer. The **SEDP** activities will be governed by this policy to keep the school surrounding safe from water pollution.

Groundwater management ordinance

29. The ordinance specifies that no tube-well shall be installed in any place without a license granted by the upazila parishad and no application shall be entertained by the upazila parishad unless it is accompanied by fees and site clearance from the local authority.

Bangladesh National Building Code

30. The basic purpose of this code is to establish minimum standards for design, construction, quality of materials, use and occupancy, location and maintenance of all buildings within Bangladesh in order to safeguard, within achievable limits, life, limb, health, property and public welfare. The design, construction or occupancy, alteration, moving, demolition, repair of any building or structure as well as installation and use of certain equipment, services and appurtenances related, connected or attached to such buildings are also regulated herein to achieve the same purpose. It covers planning administration and enforcement, general building controls and regulations, requirements for different uses, fire protection, building materials, design and services. It also covers the issue of safety of workmen during construction, the general duties of the employer to the public as well as workers, the constructional responsibilities of relevant authorities implementing civil works

Public Procurement Rule (PPR), 2008

31. This is the public procurement rules of Bangladesh and this rule shall apply to the Procurement of Goods, Works or Services by any government, semi-government or any statutory body established under any law. The rule includes the adequate measure regarding the “Safety, Security and Protection of the Environment” in the construction works. This clause includes mainly, the contractor shall take all reasonable steps to (i) safeguard the health and safety of all workers working on the Site and other persons entitled to be on it, and to keep the Site in an orderly state and (ii) protect the environment on and off the Site and to avoid damage or nuisance to persons or to property of the public or others resulting from pollution, noise or other causes arising as a consequence of the Contractors methods of operation.

3.1.2 Policy and Legal Framework for Social Safeguard

Constitution of the People's Republic of Bangladesh, 04 November 1972

32. Bangladesh Constitution defines the rights of every citizen to have access to education where the State is responsible for the provision of Basic Necessities for the citizens. Article 17

of the Constitution indicates of Free and compulsory education where the State shall adopt effective measures by:

(a) Establishing a uniform, mass-oriented and universal system of education and extending free and compulsory education to all children to such stage as may be determined by law;

(b) Relating education to the needs of society and producing properly trained and motivated citizens to serve those needs; removing illiteracy within such time as may be determined by law.

33. Article 19 (1) of the Constitution also stresses on Equality of opportunity where the State shall endeavor to ensure equality of opportunity to all citizens.

34. Article 23 stressing on National Culture demands that the State shall adopt measures to conserve the cultural traditions and heritage of the people, and so to foster and improve the national language, literature and the arts that all sections of the people are afforded the opportunity to contribute towards and to participate in the enrichment of the national culture.

National Education Policy 2010

35. Education is the right of human like the right to have proper food or a roof over head. It is stated in the article 26 of the 1948 universal declaration of Human Rights that 'everyone has the right to education.' Education is not only a right but also a passport to human development. It opens doors and expands opportunities and freedoms. It contributes to fostering peace, democracy and economic growth as well as improving health and reducing poverty. The ultimate aim of 'Education for All' means a sustainable development.³

36. Education policy in Bangladesh has always been an issue of much anticipation and as well as heated debate. All the governments, from the colonial era to the present day have tried to formulate and implement individual education policy that reflects their own ideals and vision regarding the nation's destiny. In 2010, Bangladesh got the first education policy that was made open to all for corrective and constructive opinion before final publication. Thus, the national education policy 2010, filled with pledges for reformations and progress, became the true embodiment of the nation's principles and conscience⁴. The primary objectives of this policy are directed toward the cultivation of human values. The Policy has adopted the directives in the Constitution of the People's Republic of Bangladesh and also taken into account the UN Child Rights Convention that emphasizes the ensuring of rights of children in every member state. National Education Policy 2010 intended to work as a basis for an education system suitable for the delivery of education, which will be pro-people, easily available, uniform, universal, well planned, science oriented and of high standard that would work as a strategy to counter all problems.

37. Focusing on secondary Education, the Policy aims to attain the following objectives:

³Education for all and Bangladesh perspective; *Masum Billah*; Published: Wednesday, 8 June, 2016; <http://www.observerbd.com/2016/06/08/155242.php>

⁴<http://www.thedailystar.net/supplements/25th-anniversary-special-part-3/education-policy-excellent-paper-211432>

- To help develop learners' latent intellect and comprehensive inner faculties;
- To develop a learner with competencies so that s/he can compete in the job market, especially in the economic sector of the country;
- To impart quality education at this primary level to extend and consolidate the knowledge acquired during primary education to help the students acquire a strong foundation of quality higher education;
- To make efforts to mitigate discriminations among various secondary educational institutions and among various socio-economic, ethnic and socially backward groups; special steps will be taken to support advancement of education in the backward regions as long as necessary;
- To design, continue and implement a uniform curriculum and syllabus for the selected Subjects, irrespective of streams.

38. National education Policy 2010 is the 7th Policy on education since the birth of Bangladesh. Academicians and critics alike laud the policy as the most pragmatic, timely and forward-looking education policy that addresses all segments of the society. The policy is focused towards modernizing academic curricula as demanded by present needs and incorporates science and IT oriented lessons even at Madrassa level, bans corporal punishments and training for teachers to improve their pedagogical qualities. GoB should be credited for increasing literacy rate, ensuring gender parity at the primary and secondary levels and timely distribution of textbooks in all parts of the country. Focus of MoE's SEDP is to improve the quality of teaching-learning and development partners need to support GoB's this effort as success of this program would most directly contribute in the attainment of Sustainable Development Goals (SDG).

39. When evaluating implementation of the policy, it is evident that for the first time GoB is trying to implement the education policy gradually strictly complying with its spirit. GoB has successfully implemented some of the reforms it planned to improve secondary education. MoE now has linked financing of institutions to performance, leading to the suspension of Govt. subsidies to the worst performing institutions. The composition of school and college managing committees has been reformulated to ensure greater community voices, particularly of the women members of the communities in monitoring institution's activities. With regard to financial management system, a number of measures have been taken in order to enhance transparency and accountability in the spending and allocation of resources. Widespread dissemination of information about performance of institutions, comparison of institutions' performances, incentives for better performance and support for those lagging behind because of various social reasons are also paying their due dividends.

National Sustainable Development Strategy (NSDS) 2010-21

40. The vision of the NSDS developed through extensive consultation with the stakeholders is "Achieving a happy, prosperous and enlightened Bangladesh which is free from hunger, poverty, inequality, illiteracy, and corruption and belongs completely to its citizens and maintains a healthy environment". The NSDS (2010-21) has identified five Strategic Priority

Areas along with three crosscutting areas with a view to achieving its stated vision and addressing long-term sustainability issue of critical areas.⁵

- Human resource development

An educated, well-trained and healthy population plays an important role in improving the quality of life of people, reducing poverty and attaining sustainable economic growth. Human resource development will comprise several strategies, namely population planning (Containment and management), providing quality education and training, and providing quality health and sanitation services, nutrition and food safety for all.

- Quality Education and Training

Quality education will be promoted through sustaining gender parity in primary and secondary enrolment, achieving gender parity at tertiary level, improving quality of education in all type of education systems, ensuring equity and equality in all levels of education, promoting the spirit of liberation war, history, heritage, and national culture in education, teaching environmental issues in primary and secondary curriculum, emphasizing science and technology education and promoting research, development, extension and utilization of science and technology.

GOB 7th 5-year Plan (FYP)

41. GoB's Sixth 5-year Plan put considerable emphasis on human development and notable progress was made in expanding education at all levels including tertiary education for both male and female. But there is unfinished agenda that needs to be addressed during the Seventh 5-year Plan. In particular there are important challenges regarding education quality, scientific and technical education, equity, and labor training. It was noted that further progress with human development will be critical to raise GDP growth to the 8% level envisaged in the Seventh Plan, to reduce poverty and income inequality, and to empower citizens. In line with the Rio +20 outcome document, which articulates the global sustainable development agenda, the National Sustainable Development Strategy (NSDS) identifies human resource development as a priority sector. Acknowledging that people lie at the Centre of development in Bangladesh, the NSDS calls for population planning, providing quality education and training, and providing quality health and sanitation services and nutrition for all. The challenges identified in the secondary education sector during 6th 5-year Plan that are going to be pursued during the 7th 5-year Plan include:⁶

- The access, dropout and Equity Issue
- Gender Discrimination
- The Quality Issue
 - Teacher Capacity
 - Teacher Absenteeism and tardiness
 - Inappropriateness of Curricula
 - Poor Physical Facilities

⁵<http://www.plancomm.gov.bd/wp-content/uploads/2013/09/National-Sustainable-Development-Strategy.pdf>

⁶ GoB's 7th 5-Year Plan; p 532

- Issues related to Training

ILO Convention on Tribal People, 1989 (No.169)

42. Bangladesh has ratified several international human rights treaties, including ILO Convention on Indigenous and Tribal Populations, 1957 (Convention No. 107), and its accompanying Recommendation 104 (which supplements with detailed guidelines the broad principles contained in Convention 107).

Proxy Mean Testing Stipends dedicated for the Tribal, Disable and Dropped Out Students Stipend and Tuition Program

43. MoE, under the SEQAEP, implemented a pro-poor targeting program for providing stipends and tuition/only tuition based on Proxy Mean Testing (PMT) results to increase access and retention of poor girls and boys using Local Government Engineering Department (LGED). At a later time it accommodated the disabled and the Dropout students and expanded its domain beyond indigenous households. The first phase focused on indigenous households/tribal population (TP) since academic year 2008-2009 with 61 out of 122 Upazilas in 46 districts under 6 administrative divisions covering 3342 schools. Adequate Social Screening was conducted to avoid non-tribal benefitting as tribal students. Out of 776358 applicants (only 8474 tribal students some 1.09% of total applicants and only 5691 enrolled), some 521911 students were awarded with Category 1 i.e. both stipend and tuition (all tribal students received Category 1 support) while 129387 students were awarded with tuition benefits. This trend of putting tribal applicants in Category 1 stipend continued in the subsequent years. The issue of Disabled students was brought up since 2011 and they too got the same treatment as tribal students, i.e. Category 1 stipend and tuition benefits. The PMT based Stipend & Tuition Program was found very effective in reducing dropouts from secondary education. It may be noted that MoE, under SEDP Sub Result Area 2.2: Improved access and Retention is addressing the issues of low transition from primary to secondary education and low retention at secondary education per say higher grades particularly for children from disadvantaged backgrounds. To this effect, SEDP is working on harmonizing the ongoing multiple stipends schemes with varying rates and modalities into a single stipend program. As experienced under SEQAEP, girls are expected to continue to benefit more from the harmonized stipends program. MoE wishes to implement the program in all upazilas from the first year covering grade 6 to grade 12.

3.2 Institutions for Environmental and Social Safeguard

Ministry of Environment & Forest (MoEF)/Department of Environment (DoE)

44. MOEF is the responsible ministry to deal with environmental issues. The Department of Environment (DoE) working under MOEF is responsible for the following tasks that have linkage with the ESSA. These are:

- Ensuring the quality of drinking water
- Issuance and renewal of environmental clearance certificate

Department of Public Health Engineering (DPHE)

45. In accordance to the participation agreement signed between DSHE and DPHE, DPHE is responsible for conducting arsenic testing during operation of wells. According to the MoU, DPHE is responsible for endorsing the tube well operation by assessing the physical need and chemical testing. Usually a DPHE Upazila level Sub-Assistant Engineer supports the School Management Committee in supervision of construction work of water supply and sanitation facilities. The water quality monitoring and the support during planning, construction and operation and maintenance of water supply and sanitation facilities in the rural areas in Bangladesh fall under their normal work scope.

Ministry of Education (MoE)/Directorate of Secondary and Higher Education (DSHE)

46. The Ministry of Education (MoE) is the ministry responsible for secondary, vocational and tertiary education in Bangladesh. Its functions are addressed by two principal Directorates namely the Directorate of Secondary and Higher Education (DSHE) and Directorate of Technical and Madrasah Education Division.

47. The DSHE, under the overall direction and guidance of the MoE, is continuously working towards providing education to produce enlightened people who can contribute to the development goals of Bangladesh. In order to address the issues at the secondary and higher levels, DSHE has always focused on specific actions to raising the quality of education and improving equity and access in secondary and higher education through various continuous strategies.

48. DSHE has to develop a dedicated entity to address the social concerns and the social safeguard issues. This should include developing effective strategies to include equal access for students belonging to tribal and other disadvantaged groups, gender equity strategies and action plans and effective Grievance Redressing System. This would need additional staffing and employment of dedicated ‘Social Safeguards Expert (s)’ who would be part of PSU and feed DSHE on violations and suggest corrective measures (Details are at ‘Social Safeguards Implementation’ at Section VI). Capacity building training needs assessment will have to be conducted and necessary training will have to be imparted during the first year of the program to effectively implement the social inclusion, citizens’ engagement and safeguards related components.

Ministry of Finance

49. Ministry of Finance (MoF) is committed to the secondary education program approach using the PforR instrument for the World Bank proposed lending with results based approach through Multi Financing Facility (Tranche 3 of Secondary Education Sector Investment Program)⁷ for the ADB proposed operation. Substantial progress was made in the preparation of the Government program document, including Program description, program expenditure framework, Results Framework, results-areas and DLIs, implementation arrangements, modality of and activities under the Technical Assistance Facility (TAF).

⁷Financing Framework Agreement of the Secondary Education Sector Investment Program (2013-2023) signed by the government and ADB on 22 July 2013.

SECTION IV: POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS OF THE PROGRAM

50. This section presents the environmental and social benefits, risks and impacts of the Program. The risks have been identified using the Environmental and Social Risk Screening Format included in the World Bank's Policy for PforR Financing that determined the boundary of assessment. It also covers the likely environmental and social effects, the environmental and social context, institutional capacity, and the reputational and political risk

4.1 Environmental Risks and Opportunities of the Program

4.1.1 Potential Environmental Risks

51. One of the objectives of Program under results area 2 (Improved Access and Retention) is to provide safe environment, drinking water supply, sanitation and improvised/renovated classroom for students. The Program will finance for demand-driven safe drinking water supply, sanitation and physical facilities to ensure improved environment of teaching-learning in comparatively disadvantaged institution. The provision of the improved facilities will likely lead to better health outcomes for students and increase their attitude to learn. The financing will contribute to improve the school environment, make the students school wards and to achieve quality of education. However, the proposed activities may pose several environmental risks which is described as follows:

52. Activities planned under the proposed PforR will include physical interventions such as construction, rehabilitation and renovation works as the schools will expand its existing facilities (e.g. increase of classrooms). Construction/rehabilitation works will be within its premises and no new land acquisitions will be involved. Any loss or conversion of natural habitats and any changes in land or resource use are not anticipated. The program-related anticipated environmental impacts, although very limited, may include drainage congestion/water logging, dust pollution, noise pollution, disruption of natural ecosystem, occupational health hazards due to improper management of construction materials and solid and hazardous waste. Due to the vulnerable geographic location, there may be some risks, which may include natural disasters (earthquake); and extreme climate events (heat wave, cyclone, storm surge etc.). These impacts are not Program-related; rather they are geographically location-related and site specific. Construction activities will cause temporary disruption of school activities short-term localized environmental pollution. There is also risk of public and worker health and safety.

53. The major environmental concern of the program is the possibility of exposure to naturally occurring salinity and toxic elements such as Arsenic and Manganese in groundwater as well as bacteriological contaminants as the Program aims to ensure safe drinking water (by installing tubewells) and sanitation provision to the students. These problems are site-specific, geologic in origin and occurs in specific geographic locations in Bangladesh. Arsenic poses the major environmental and health risk in many of the areas in Bangladesh. In absence of proper testing facilities and alternative option, students may continue to consume arsenic contaminated water in the arsenic affected areas of the Program. The health effects of arsenic exposure are well-documented. The long-term exposures to arsenic in drinking water may result dermal changes (black spots, thickening and roughness of palms and soles, white intermittent dots, nodular growth on palms and soles, swelling of feet and legs, peripheral neuropathy, kidney and liver disorder etc.) in initial and second stage. Gangrene or cancer may result at the final stage.

54. There are also alternate water supply technologies available (e.g. Pond Sand Filter, Rainwater harvesting, dug wells) in order to avoid arsenic contamination. In such options, there is a risk of bacterial contamination due to lack of proper operation and maintenance of alternative water sources. If no other option is available except arsenic water treatment, sludge handling will be an issue and proper protocol is required.

55. The other environmental risks include: (i) close proximity of toilets to tube-wells and broken platform of tube wells that can lead to groundwater contamination (ii) lack of proper design, construction and maintenance of tube well platform and drainage system can create drainage congestion, (iii) inadequate maintenance of toilets and water logging can create mosquito breeding habitat.

56. Bangladesh, in general, faces several natural disasters, which can pose risk to WASH interventions in these schools. Frequent and recurring natural disasters, such as floods and cyclones, can trigger outbreaks of waterborne diseases, destroy existing sanitation facilities and compromise safe water supplies, compounding existing health issues.

4.1.2 Analysis of Existing Situation and Gaps in Implementation

57. The Ministry of Education prepared an Environmental Assessment and Review Framework (EARF) in 2013 for the ADB-supported civil works component of the Secondary Education Sector Investment Program (SESIP). This EARF was prepared to establish the mechanism to determine and assess future potential environmental impacts of civil works that are to be identified and cleared based on a participatory demand-driven process and to set out required mitigation, monitoring, and institutional measures to be taken during implementation and operation to eliminate adverse environmental impacts, or to reduce them to acceptable limits. An environmental screening using rapid environmental assessment (REA) checklist was formulated to ascertain environmental category of each school and office infrastructure and other civil works. According to the EARF, IEE will be carried out for 'Category B' (or 'Orange B') projects and an Environmental Due Diligence (EDD) shall be prepared for 'Category C' projects and the EARF provides the guidelines for preparing IEE and EDD. A site-specific EMP preparation was proposed due to varying geographic conditions (climate change, disaster-prone areas, coastal salinity etc.) along with an institutional framework for implementation. In this context, the EMP has been included into the bidding documents of all the construction packages so that it serves as a condition of contract for adopting the Environmental Code of Practices by the prospective contractor(s). The Education Engineering Department (EED) has the responsibility of EMP implementation, through its project monitoring unit. The implementation of the EMP and/or Environmental Code of Practices by the contractor(s) is to be supervised by Construction Supervision Consultant in close consultation with the project implementation unit of EED. The EARF assigns specific responsibilities for EDD where environmental screening is to be carried out by the Assistant Engineer at Regional Office and IEE, if required, will be the responsibility of the Executive Engineer of EED. There is no dedicated environmental focal point in the implementing agency of DSHE and the basic knowledge of environmental safeguard is inadequate among the engineers in EED. There is no institutional setup, position, or assigned personnel looking after environmental safeguards issue. An environment unit was proposed to be established at the central office of the Planning Cell of the EED under the MoE, which will appoint an environmental focal person from the Directorate who shall lead the safeguard activities. However, such a unit has not been established yet.

58. SESIP hired an environmental consultant to oversee and assess the environmental safeguard activities of civil construction works by EED and the consultant has been providing semi-annual monitoring reports on compliance to EARF. It was observed that the performance of the EED in implementation of EMP was less than satisfactory due to inadequate capacity (technical knowledge, lack of active site supervision to ensure quality of work, materials and construction standards). As per the EARF, the EMP has not been included into the Bidding Documents of the construction packages to serve as a condition of contract for adopting the Environmental Code of Practices by the prospective contractor(s). Since there was no contractual obligation to monitor environmental quality by the contractor, no monitoring data was secured by PMU(SESIP) from the sampling of the air, water, and noise during construction. Also, there was no Construction Supervision Consultant to supervise the implementation of the EMP and/or Environmental code of Practices by the contractor(s). From field observation, it was found that environmental due diligence during construction activities were partially carried out by the contractor and/or EED. A few observations were:

- Workers lacked Personal Protective Equipment (PPE) and first aid facilities at most jobsites
- Workers provided substandard housing and sanitary facilities in some sites
- Lack of temporary signage and directions for safety of public and assisting traffic
- Lack of good housekeeping (resulting in wind-blown dust from stockpiled construction materials)
- Lack of proper construction waste management
- Construction materials not properly stacked in school premises causing safety hazard for school children

59. Some of the above issues may have been alleviated or addressed if the site-specific EMP has been incorporated in the bidding documents.

60. Regarding provision of safe water supply to schools, the implementing agencies have been conducting due diligence in periodically monitoring water quality (Arsenic, Manganese, bacteriological quality) in association with DPHE and submitting water quality monitoring data in a yearly basis since the inception of the SEQAEAP project. An Environmental Management Framework (EMF) has been developed by DSHE which basically lays out set of principles, ideas, guidelines or agreements that provides the basis or outline for the identification, assessment, and mitigation of environmental impacts (water supply and hygiene interventions). The project has also developed its own operational manual for installation of water supply sources and sanitary latrines based on the available guidelines of Department of Public Health Engineering (DPHE) and International Training Network (ITN) Bangladesh Center for Water Supply and Waste Management. SEQAEAP provided HACH Arsenic test kits to DPHE and DPHE with the assistance of local government officials at the upazila level have been conducting water quality testing at all educational institutions under SEQAEAP. The major findings from recent monitoring reports are presented below in order to assess the existing situation.

61. The water supply in these schools is predominantly (95%) through tube wells. A small fraction use Pond Sand Filters and Rainwater Harvesting as water source. A certain fraction of the tube wells remained unattended (i.e. water quality not tested) and found damaged each year. For example, among the 9567 tube wells that were targeted for assessment in year 2015, 1114 tube wells were unattended. As a result, significant numbers of students are taking water without knowing its quality especially arsenic concentration. Also, for the same year 355 tube well were

found permanently damaged in same the survey year. A comparative statement of unattended tube well for test last seven years are shown in below Figure.

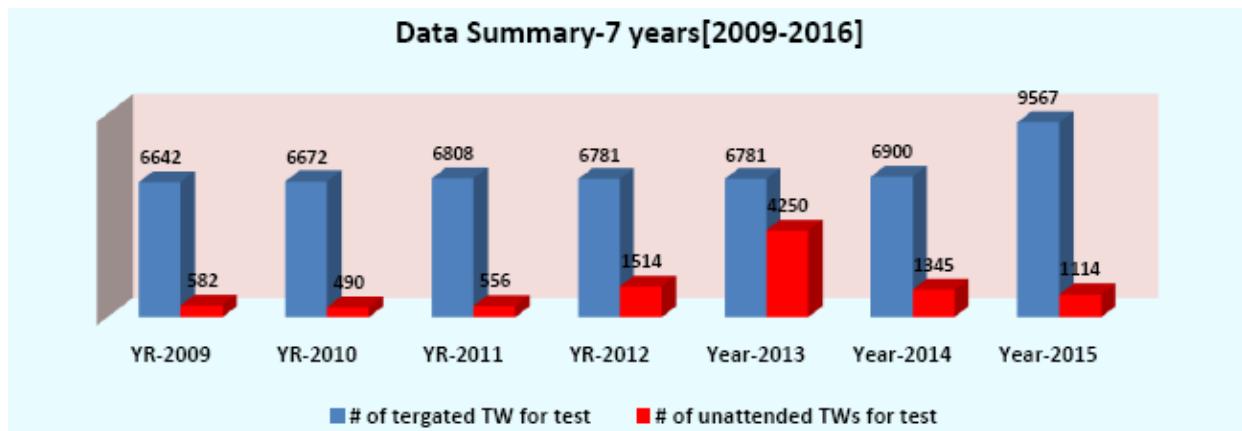


Figure 1: Number of tubewells targeted for testing and number of unattended tubewells during 2009 - 2015 under SEQAEP (MoE, 2015b)

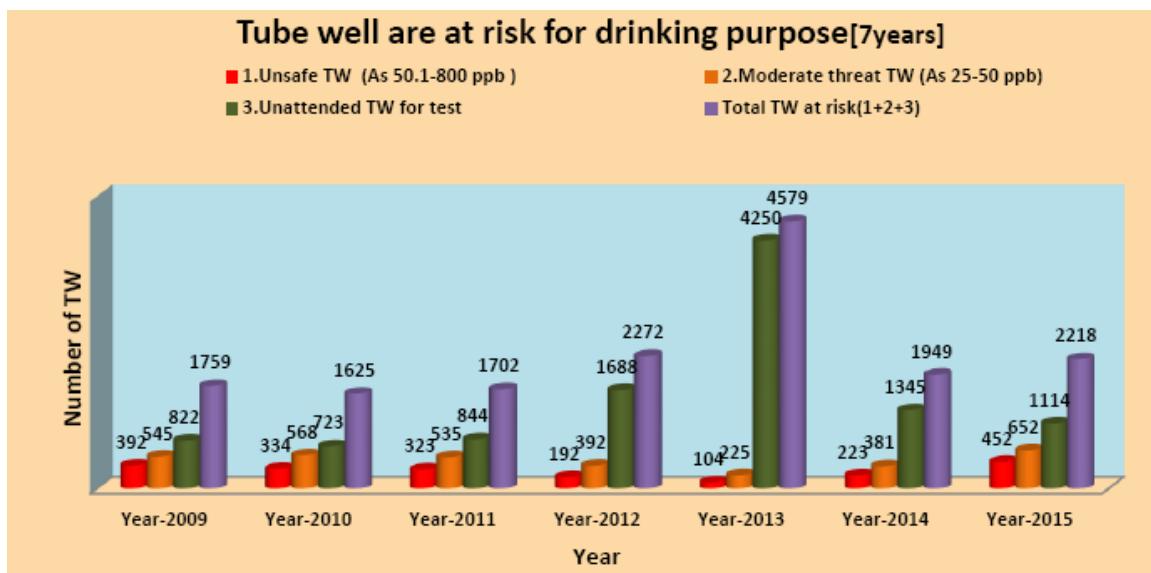


Figure 2: The number of tube wells in the educational institutions under SEQAEP that are at risk of arsenic contamination over the years 2009 – 2015 (MoE, 2015b)

62. There are still arsenic-contaminated tube wells, which are used as drinking water source in the schools. In an assessment in 2015, among the 9567 tube wells, 452 tube well have been found unsafe having high arsenic concentration (50.1- 500 ppb), 652 tube well have been found moderate unsafe with arsenic concentration 25 to 50 ppb. The status of arsenic contaminated tube wells over the years 2009-2015 is shown in Figure 2. There could be several reasons for having arsenic contaminated tube wells: (i) the tube wells those were screened for arsenic contamination in the previous years have not been shut off from operation; (ii) some tube wells which were previously not arsenic-contaminated have now become contaminated due to geological reasons. Especially, the tube wells, which have arsenic concentration within the range of 25-50 ppb have a high possibility further increase in concentration. Therefore, even though the tube wells are considered arsenic-safe today should be kept under close monitoring in future. The allowable limit of arsenic concentration in drinking water in Bangladesh is 50 ppb (ECR, 1997). It is assumed from water quality monitoring data of 2015 that 0.70 million students out of

3 million in these educational institutions are confronted with the risk of chronic arsenic toxicity (MoE, 2015b).

63. There is a discrepancy between the safe drinking water limits of manganese concentration between Bangladesh standards and WHO guidelines. Most of the tube wells under SEQAEAP (as well as all over Bangladesh) currently do not comply with the allowable Manganese concentration of 0.1 ppm as per Bangladesh Standards (ECR, 1997). From the assessment report of 2015, only 65% tube well were found safe from manganese contamination as per BD Standard (Bangladesh Drinking Water Quality Standard). On the other hand, WHO does not prescribe any health-based standard for Manganese in their latest guidelines (WHO, 2014). Therefore there is a mismatch in the safe water quality requirement between Bangladesh Standards and WHO. "Water Safety Framework (WSF) in Bangladesh" has recently (October, 2011) been approved by Ministry of Local Government and it is mentioned in Health Based (Water Quality) parameter and target that the manganese acceptable limit in drinking water is 0.4 ppm. Considering the safe limit to be 0.4 ppm, only 10% (838TWs) can be considered unsafe. However, since the legally enforceable limit is still 0.1 ppm, statistics will show that a large quantity of these tube wells is unsafe for drinking.

64. Under SEQAEAP, sanitary facilities have been installed in school premises and all institutions have sufficient number of latrine facilities for both boys and girls. Although a comprehensive assessment of the performance of these sanitary latrines and hygiene practices in all these schools is not available, the environmental assessment report in 2015 gives us some indication on current features of sanitary facilities based on random sampling in these institutions. It was found that not all latrines were designed as per DPHE guidelines and may not be equipped with the requirements of current standards. For example, only 69% of these institutions have running water provisions inside the latrine, which is considered a standard practice now. Even among the ones which have running water provisions inside the toilet, only 77% of them have water all the time, 15% have water running occasionally while the rest 8% do not actually get water through these taps. 33% of schools reported that there is waterlogging around the pan in the toilet which may be a result of not having proper water drainage provisions inside the latrine. 47% of the institutions do not have proper drainage system around the latrine and therefore most of these experiences waterlogging in the areas surrounding the latrines. However, it may be noted that not all sanitation facilities in these institutions were installed by SEQAEAP.

65. Personal hygiene and hygiene education are important for health and well being of students. Distribution of hygiene promotion communication materials have been started from 2014. 35% institutes out of 5340 institutes surveyed in 2015 have received communication materials from SEQAEAP. Hand washing is one of the most important factors in controlling the spread of micro-organisms and in preventing the development of infections and toilets must have convenient hand washing facilities inside or close by. It was found that only 52% institutes have hand washing facilities inside latrine room and 23% institutes have facilities close to latrine and 25% institutes have hand washing facilities far from latrine room. This is an area where the school facility can work on to improve the hygiene behavior of students. Also 80% institutions reported of using soap after using the latrine and only 65% reported having adequate water for hand washing. The menstrual hygiene management needs improvement as well since only a small number of institutes have facilities for menstrual hygiene management (MHM) for female teachers and girls.

66. Structural and tube well installation issues can potentially affect the quality of water which also needs attention in this regard. It has been observed that only 70% tube well platform and drainage system of water is in good condition while in the rest of the cases the platform is broken or proper drainage provisions are non-existent. As a result water logging can create mosquito-breeding habitat, which can pose health risk for student. The other environmental risk is the close proximity of toilets to tube wells, which can lead to groundwater contamination. Guidelines suggest that to prevent contamination of water resources, minimum distance between a tube-well and a latrine should be 15 meter. In case of shallow shrouded hand tube-well, this distance should be 20 meter as horizontal filters are used in this type of tube-well. It was found that the distance between tube well and latrine of 49% institutes is less than 15 meter and 51% is more than 15 meter. Although no bacteriological tests of drinking water was done to validate the extent of this risk, it is possible that the risk of bacterial contamination is present in such cases.

67. Also, only 5% tube wells have been tested for bacterial contamination. It is largely unknown whether or not all the tube wells installed under SEQAEAP are providing coliform-free water. Since there have been instances where tube wells have been installed very close to the latrines and there are tube wells with damaged bases, it is imperative that the water from these need to be periodically tested for bacterial contamination.

4.1.3 Potential Environmental Benefits and Opportunities

68. The PforR provides an opportunity to enhance systems to ensure provision of safe, clean and hygienic environment for students while also providing an opportunity to improve measures regarding water supply sanitation and promotion of hygiene. This may reduce the disease burden associated with these factors and improve the quality of life

66. School student spend long hours in school campus and school environment significantly determine these student's health and happiness. Schools are the places where student get infected frequently. Even disease spread faster, because many students gather together for many hours a day in space with limited wash facilities. Infectious diseases due to unsafe water, inadequate sanitation, improper or lack of hygiene practices, ill functioning hand washing facilities without soap etc. are the key factors of lower school attendance which finally increase the drop-out. Having a wash program in school can have a multitude of benefits including (a) decrease of dropout, (b) increase academic performance, (c) girls learning about menstrual hygiene and physical and emotional changes during puberty encouraging them to come to school during menstruation, (d) adopting practices of equal division of hygiene-related task such as cleaning of toilet, cleaning of solid waste etc. Wash promotion in school is a first step towards ensuring a healthy physical learning environment. This can be addressed through various DLIs under the results area 1 (enhanced quality and relevance of secondary education) by incorporating wash-related education in the curricula. Schools influence children behavior and childhood is the best time for children to learn hygiene behavior. Hygiene behavior together with improved facilities brings improvement in health condition.

67. Children have a right to basic facilities such as school toilets, safe drinking water, clean surroundings and information on hygiene. If these conditions are created, children come to school, enjoy learning, learn better and take back to their families' concepts and practices on sanitation and hygiene. In this way, investment in education is more productive. Such conditions have an even greater positive outcome for girls who often stay away from or drop out of schools, which do not have menstrual hygiene management facilities.

4.2 Social Risks and Opportunities of the Program

4.2.1 Analysis of the Existing Situation

68. The existing situation in the country is conducive to education for girls in general and secondary and higher education in particular. There is gender parity in terms of accessing primary education where at times the girls are noted to be more than boys.

69. Unfortunately, certain prevailing negative socio-cultural aspects are causing hindrance in adolescent girls' accessing secondary education. As a result they are willingly/unwillingly dropping out from secondary education. This is true for both girls from the mainstream community and also the TP.

70. While addressing the TP, the matter needs to be viewed and addressed differently. Owing to poverty, illiteracy, lack of awareness of the parents, prevailing security situation particularly in the CHTs, poor infrastructure and facilities including shortage of required qualified teachers (particularly English, Mathematics and Science subjects) and laboratory facilities, and remoteness of the living, the TPs including adolescent girls are dropped out after completing primary education. The adolescent girls of the TP community in the Plain Areas are part of the minorities and often face inequitable behavior inflicted upon them by their teachers/school and college management committees and fellow students. This is due to ignorance of the teachers and mainstream students about the minority culture, their way of living, traditions, festivals, and harvesting rituals etc. Due attention to these values and cultural and religious rituals are often ignored/overlooked/missed out from the academic calendar where the same issues of the mainstream students are focused. Such discriminations cause discomfort and sometimes lead to discontinuation of studies by many. There is need for wider awareness about TP communities' culture and way of life by the mainstream Bengali community. Community level civic engagements in education sector in general and schools in particular, ensuring presence of members in School/College Management committee from the TP community as well as awareness raising training for the teachers and students can arrest such prejudices and discriminations.

71. The Bank, starting in 1993, pioneered female secondary school assistance program (FSSAP) through Conditional cash transfer (CCT), and is deeply involved on primarily increasing access to primary and secondary schools and innovation efforts to improve the quality of school education. In the recent past, Bank financed Secondary Education Quality and Access Enhancement Project (SEQAEP: 2008-2017, IDA US\$396 million) introduced a second-generation stipends program where the former gender-targeted stipend scheme was revised as poverty-targeted stipends – using the Proxy Means Testing (PMT) selection method - to target the neediest group of children for improving their access to and retention in secondary education. The program currently benefits 2 million students annually. Bangladesh, being a signatory to the attainment of SDG Goals is focused on SDG 4 that aims to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all. GoB's SESDP is the answer towards attaining SDG 4⁸ and this adds to the opportunities to the Bank's program.

⁸The indicators to monitor the SDG4-Education 2030 agenda,

4.2.1 Potential Challenges and Social Risks

72. Bangladesh has made remarkable gains in human development indicators over the past decades by ensuring access to education, especially at the primary level and for girls. The country's net enrollment rate at the primary school level increased from 80 percent in 2000 to 98 percent in 2015, and secondary school net enrollment is now around 54 percent, up from 45 percent in 2000. Furthermore, the percentage of children completing primary school is close to 80 percent.⁹ The nation-state has also overcome gender disparity in access to primary and secondary education over the last two decades. Female enrolment and completion rates in fact surpass males, raising a concern about disadvantage of adolescent boys who may be drawn into child labor to support their families. The gender gap in adult literacy and in vocational-technical education and training, though improving, still persists.¹⁰ However, there exist certain social risks that hinder adolescent girls of the mainstream population and the tribal communities from accessing and completing the secondary education. This is owing to their age (Grade 9 – 12 girls are likely to be between 14 -18 years old), parental financial condition, proximity of home from the school and prevailing socio-cultural realities in the location. These are indicated below:

- ***Early Marriage***

73. Bangladesh has one of the highest child marriage rates in the world – the highest in Asia. Over half (52%) of Bangladeshi girls get married before 18 and almost one-fifth (18%) are married off before 15 (UNICEF, 2016). Most/all of the victims of the child marriages come generally from the poorer class (VGs), with poor earnings and no/little education of the parents and wrong religious understanding. Though dowry is officially banned, yet it works under the veil and poor parents choose early marriage, as they would be unable to pay higher dowry as their daughters attain adulthood. Some of these girls are illiterate while the rest have just cleared the compulsory primary level education and could not join/complete secondary education. These victims are forced into a conjugal life before attaining the physical and mental maturity and this social vice finally leads to early motherhood where both the baby and child mother's life is putto risks. These girls upon marriage join the school Dropouts and become victims of domestic exploitation and sexual abuse.

74. As observed from the experience of SEQAEP, the stipend given is too meager and hardly contributes in stopping early marriage. The Program supports a harmonized stipends program. The stipend amount will be reviewed and revised accordingly under the harmonized stipend program. As experienced under SEQAEP, the girls are expected to benefit more from the stipends program. In addition, female students will also receive special support, including counselling through the Adolescent Girls' Program.

75. Of late, GoB has passed a law allowing marriages of underage girls and boys in ‘special cases’. The ‘Child Marriage Restraint Bill 2017’ puts boys below 21 years of age and girls below 18 years in the underage category. Any marriage involving one or both parties below the legal age will be considered ‘child marriage’. However, marriages involving underage brides or

⁹<http://www.worldbank.org/en/results/2016/10/07/ensuring-education-for-all-bangladeshis>

¹⁰<http://unesdoc.unesco.org/images/0023/002305/230507e.pdf>

grooms will not be considered an offence if they take place with the consent of the court and the guardians in “special contexts” serving the “best interest” of the underage female, the law says.¹¹ This law could be abused by the vested groups in their favor, which will then work against access to secondary education by the girls under VG and TP.

- ***Harassment of Girls between homes and schools***

76. The PforR is focused on students between grades 6-12. These girls are in their mid and late teens and are often harassed on their way to school/college and back. The incidents are not centered to remote and semi urban areas only. Even in the Capital city of Dhaka, four days after being stabbed by her stalker, a class-VIII student, lost the battle for her life on August 28, 2016. The incident happened when she was going home in Siddique Bazar area from the school.¹² Social vices and existing socio-political realities make the adolescent boys become rogue and projecting their manhood in a negative manner. Incidents of this nature are the wrong examples for the society and would have adverse impact on the access of girls in secondary education.

- ***Eve Teasing***

77. A social menace, eve teasing is rampant particularly in close proximity to the schools and on ways to school and back. This alone is responsible from barring aspirant girls from seeking education as parents/guardians are failing to stop it socially. The people in the remote and sub-urban areas are modest and conservative and would rather stop their sisters/daughters from attending schools against their safety, and social dignity. The problem is more pronounced in semi urban and small towns all over the country. GoB’s measures in the form of punishing eve teasers through mobile courts are far from stopping this menace.

78. The issue is a serious concern for adolescents and parents/guardians alike. The schools need to mobilize to stop such incidents and there is a need to have inter-ministerial coordination at the macro and micro levels using the local administration. Local leadership, civil societies can also effectively work with local administration in arresting the situation through organizing seminar, symposium etc. to promote secondary education for all and voicing against Eve Teasing.

- ***Problems faced by adolescents in the Urban slum and Char/hard-to-reach areas***

79. Around five million Bangladeshi children between the ages of six and 13 – mostly from poor families, urban slums, and hard-to-reach areas – remain out of school.¹³ They all form part of the ‘Vulnerable Group, or VG for this ESSA. While Primary schools are within easy reach in a community, the picture is different with High Schools and Colleges and Madrasas. Adolescent girls from the urban slums, Char and hard-to-reach areas find it difficult to get to the High Schools and Colleges and Madrasas and this is one of the major reasons why there is dropout from primary to secondary education among the girls. Local schools along with participation of

¹¹<http://www.dhakatribune.com/bangladesh/law-rights/2017/02/27/child-marriage-bill-passed/>

¹²<http://www.thedailystar.net/frontpage/risha-loses-the-battle-life-1277044>

¹³<http://www.worldbank.org/en/results/2016/10/07/ensuring-education-for-all-bangladeshis>

Parents-teachers Associations (PTA), School Managing Committees (SMCs) and community-wide civic engagements may come up with home grown ideas for solving the transportation problem for the adolescent girls undertaking secondary education from these areas.

- ***Insufficient and lack of gender directed facilities in the School/College***

80. Though all the schools and colleges have minimum facilities to run the academic curricula, these institutions lack facilities for safe drinking water, gender friendly latrines and other facilities to meet the special monthly needs of the adolescent girls. Though all the school/colleges have women teachers, but this particular important aspect is missed. Other than certain urban schools, most do not have first aid facility and doctor within the campus.

- ***Children with Special Needs***

81. According to UNICEF (2014), “the term ‘children with special needs’ covers a wide range of types and degrees of disability in terms of limitations in activity. The disability may result from the interaction of attitudinal, institutional and environmental barriers in society with visual, hearing or speech impairments; other physical impairments such as loss of limbs, cerebral palsy, spina bifida, muscular dystrophy or traumatic spinal cord injury; and intellectual and neuro-developmental impairments including Down syndrome and autism spectrum disorders. Data on children with disabilities in Bangladesh are limited and often not reliable, or underestimate the prevalence due to varying definitions of disabilities and data collection processes. The estimate of people with disabilities ranges from 1.4 per cent to 9 per cent of the population, according to surveys conducted by the Government in the last decade. Estimates of the proportion of children with disabilities in Bangladesh are even more varied, ranging from less than 1.4 per cent to 17.5 per cent. Given the estimated child population of 57.5 million, the number of children with some form of disability could range from under 805,000 to 10 million.”¹⁴ While the GoB follows a strategy of integrating children with disability in mainstream schools by arranging ramps, toilet facilities etc. the children with intellectual and mental issues may not be able to integrate in such schools.

82. Since July 2014, MoE, under the guidance of Hon’ble Prime Minister of Bangladesh has established National Academy for Autism and Neuro-developmental Disabilities (NAAND) as a project under DSHE with the aim of making the children with special needs self-reliant and capable to integrate to the mainstream society. By now NAAND has successfully trained some 800 Master Trainers and 26,000 teachers throughout Bangladesh. Most of the Master Trainers are TTC Staff and BCS (Education) Cadre Officers. NAAND aims to have at least two teachers trained on autism and neuro-developmental disability issues so that students with these problems can be identified at an early stage and treated accordingly. The Academy plans to house a Central Teachers Training Unit, 2 hostels for students, a research facility and other in-house facilities including means of mainstreaming and socialization, IT, Vocational Training etc. The Program may work with this center to enhance its activities.

¹⁴ Unicef (2014), Situation Analysis on Children with disabilities in Bangladesh” available at https://www.unicef.org/bangladesh/SACDB_Report_FINAL.pdf accessed on May 22, 2017

- *Focusing on Girls from the erstwhile 111 enclaves that merged with the Bangladesh main territory on August 1' 2015*

83. After the historic Land Boundary Agreement between Bangladesh and India, some 111 enclaves with a population of 37334 new citizens became part of Bangladesh on August 1, 2015. Since 1947, people of these enclaves had no clear identity and suffered socially, politically and economically. They enjoyed none of the basic facilities including hospital services, schools, electricity, pure drinking water, banking etc. The younger people had very little scope of quality education and it was difficult for girls in particular to pursue secondary level education by attending schools in the mainland. In January 2016, GoB approved Taka 1.8 billion (about US \$22.9 million) development project for its 111 erstwhile enclaves, including supplying potable water and building hundreds of kilometers of new bridges and roads, local markets, mosques, and community centers—to be completed by 2018.¹⁵ However, focus on progressing education through building secondary schools and providing financial support to adolescent girls pursuing education did not get much focus. This matter is a challenge and a potential risk for the girls and adolescents aspiring to pursue secondary education. The issue needs to be addressed seriously like the secondary education of the VG and IP/TP. It needs to be seen if the SEDP program of GoB has specific attention, budget and program focusing the secondary education of the girls of these areas. These adolescents should also be considered to have come from hard-to-reach areas and supported accordingly.

- *Special Difficulties faced by adolescents amongst the Tribal Population (TP)*

84. There are 29 tribal communities living in Bangladesh who account for over 2 million. The largest concentration is in the Chittagong Hill Tracts but other areas in which these communities live include Chittagong, greater Mymensingh, greater Rajshahi, greater Sylhet, Patuakhali and Barguna. The notable tribes include Chakma, Garo, Monipuri, Marma, Munda, Oraon, Santal, Khasi, Kuki, Tripura, Mro, Hajong and Rakhain are. The table below shows areas of TP/IP concentration in Bangladesh.

Table 3: Areas of TP Concentration in Bangladesh

	Areas of TP Concentration	Predominant TPs
Plains		
1.	Rajshahi Division, Naogaon, Dinajpur Rajshahi, & Joypurhat Districts	Santal, Munda and Oraon
2.	Sylhet Division, Maulavibazar and Hobigonj Districts	Khasia, Monipuri, Patro, Garo and Tripura
3.	Madhupur Area of Dhaka Division	Garo/Mandi
4.	Patuakhali (Barisal Division) and Cox'Bazar (Chittagong Division) Districts	Rakhain
5.	Khulna Division, in Sundarbans	Munda
Hills		

¹⁵<http://www.thedailystar.net/op-ed/politics/land-boundary-agreement-and-bangladesh-india-relations-81550>

6.	Chittagong Hill Tracts	Chakma, Marma, Tripura and others
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Source: ADB 2nd Rural Development Project IP Plan, March 2011 (on basis of Bangladesh Bureau of Statistics (BBS), 2001)

85. Owing to remoteness of the living, particularly in the CHTs, prevailing security situation, poverty, illiteracy, lack of awareness of the parents, poor infrastructure, inadequate transportation facilities, shortage of required qualified teachers (particularly English, Mathematics and Science subjects), laboratory, dedicated washrooms and allied facilities, adolescent girls of the TPs are dropped out before/after completing primary education. The matter is more appalling for the other TPs residing outside CHTs as they are small minorities in their locations amongst majority Bengali population. The schools seldom take note of the special needs/aspirations and cultural differences of these splinter groups and push the culture of the majority towards them. TP are having poor representation in the Governing Board of these schools and wherever present, they are mostly meek. Specific risks pertaining girls from the tribal community that are adversely affecting their completion of secondary education can be summarized as follows:

- **Extreme poverty and lack of awareness**

86. This is particularly noted in the hard-to-reach areas inhabited by the IP, particularly in the CHTs, Garo Hills in Mymensingh and some part of Dinajpur. Owing to lack of employment in view of limited industrialization, poor skill and remaining isolated from the mainstream population, they suffer from extreme poverty and are seldom visited by mainstream GoB and other relevant agencies. Children there are assets for earning through tilling farmland/working in some other areas where educational qualifications have limited use. As such they remain in the dark on GoB's programs on Education sector and the benefits of education for their children.

- **Remoteness and poor facilities.**

87. Owing to difficult terrain and nature of habitat amongst the tribal communities, it is not possible to have primary and secondary schools in every para/village. The local community in these regions often have schools established near some market hubs/communication centers on a road junction/river bend that have easy access. These schools lack required facilities including laboratory, library, sports facilities, drinking water and sex defined washroom facilities. In the CHTs these schools are seldom visited by the UPEO/USEO citing security reasons. Absenteeism is most common amongst the teachers, as they do not have to be accountable and visit Upazila HQ to collect their salary once in a month.

- **Lack of understanding of the tribal cultures**

88. Other than primary schools, there are seldom any school/college for 'tribal only' students. Since there is always preponderance of mainstream students, the school authority often ignores/ fails to understand the special needs of the tribal students. Language barrier compounds the problem further. There is a necessity to include senior tribal personalities in the School management committees beside tribal teachers from the tribal community, who, in turn can educate/help school/college authority about the diverse culture and lifestyle of the IP students. The tribal students (both boys and girls) often work in the fields with parents during harvesting season. This matter needs to be registered by the school/college authority before developing

study plan. But as there is seldom any communication among teachers, management committee and the parents from the tribal community, the study plan is developed like schools/colleges of the mainstream population. This is also another major reason for dropouts from among the TP students.

89. There is a necessity to undertake ‘Social screening’ to identify the TP students from amongst the mainstream students, and their concerns/suggestions etc. regarding the execution of the Program. A suggested Social Screening Form is given at Annex A.

90. It is expected that TSER would have positive social impact, especially through the Results Area 2, for children from disadvantaged groups, and girls. As the coverage of the Program would include all the upazila of Bangladesh with an aim of leaving no child behind; ethnic minorities and tribal people will also benefit from this operation. Moreover, collaboration with the Global financing facility (GFF) in the Health sector will: (i) focus on adolescent girls’ school health program through provision of separate latrines for girls, and counseling programs to raise awareness about empowerment, schooling outcomes and health/hygiene; and (ii) support technical assistance for design and implementation of the secondary education program results areas/activities that enhance educational and health outcomes of adolescent girls in Bangladesh. Both the issues will have positive impact in improving adolescent health of girls and sanitation facilities; thus bringing further social benefits. Given the above issues, initial assessment of the social risk level of the PforR, after expected mitigation, is **Moderate**.

4.2.2 Potential Social Benefits and Opportunities

Potential Social Benefits

91. Potential social benefits of the TSER are enormous. Access to and completion of Secondary education by the adolescent girls would strengthen women empowerment through broadening their outlook and widening their judgment through participation/employment in various sectors. This will also assist in Gender mainstreaming whereby educated women would find a place in various jobs including School Management Committees and directly contribute in removing hurdles they faced while pursuing secondary education. Specifically, some of the important social benefits are as follows:

- Raising the standard of education by the VG, TP and the adolescent girls from the pro-poor societies and ensuring gender parity in the Secondary Education sector.
- Fulfilling aspirations of the girls and adolescents of the erstwhile enclaves to pursue secondary education and move hand in glove with the mainstream girls.
- Arresting early marriage leading to infant and young mother mortality.
- Creating self-employment opportunity after secondary education is completed.
- Enlightened society through educated mother
- Healthy homemaking and childcare through marriage at the appropriate time.
- Poverty at households reduced by becoming effective earning member in the family.
- Women empowerment through participation in family and community decision-making.
- Educated women would contribute in environmental protection, and

- Directly and indirectly contributing to the attainment of SDG 1 - No Poverty, 2 – Zero Hunger, 3 - Good Health and wellbeing, 5 - Gender Equality, 6 – Decent Work and economic growth, and SDG 10 – Reduced Inequalities.

92. As the secondary education curriculum undergoes revision and updating by the National Curriculum Policy Framework (NCPF) that is taking shape under MoE, it is expected to be fully integrated across relevant grades, competency-based and benchmarked against national learning goals. This will demand NCTB to be restructured with additional competent staffs to take on the task of revising and implementing curriculum for grades 6-10 by the end of the 5th year (including dissemination of curriculum, distribution of textbooks and evidence of schools offering differentiated subjects). DLI 1 is in tandem with SEDP Sub-Result Area 1.1 and is expected contribute to bringing transformational change in the medium to long term by strengthening NCTB capacity and providing opportunities to the adolescent girls including marginalized ones from the poor and hard-to-reach areas including urban slums, erstwhile enclaves and TPs from the plains and the CHTs undergoing secondary education to choose subjects according to their ability and interest. These will meet their personal and market needs, contributing to system efficiency (retention) and ultimately to nation building.

93. DLI 2 is on Assessment and Examination System reforms implemented to improve teaching /learning and goes along SEDP Sub-Result area 1.4. DLI 2 will trigger ending of prevalent memorizing and rote learning practices at the secondary level and formulation and implementation of a national examination plan for secondary-level examinations (JSC, SSC, HSC); facilitate a move towards international best practice and standardization of examination across subjects, years and boards (standardization of test items, administration, marking process, results). Thus, standardizing examinations would help the system by making it competency-based. Like all students, the target adolescent girls including marginalized ones from the poor and hard-to-reach areas including urban slums, erstwhile enclaves and TPs from the plains and the CHTs undergoing secondary education will also be equally benefited.

94. DLI 3's focus is on 'Improved teaching/learning in Bangla, English, Mathematics and science. It is also the SEDP sub-result area 1.3. Challenges like Low learning levels in English and Math; declining enrollments in science subject; and limited reading habits and proficiency needs focus and systematic interventions to improve teaching/learning in these areas. DLI 3 will bring transformational change in teaching learning practices. Thus, improved teaching/learning in Bangla, English, Mathematics and science would help the students to have a better hold on these subjects. Like all students, the target adolescents including from the TP will also be immensely benefited.

95. DLI 4 emphasizes on improved teacher management and accountability. This demands MPO rationalization plan to be approved and MPO implementation guidelines updated by MoE. DLI 4 provides incentives to the Government, schools, and their teachers to address MPO problem and non-MPO teacher imbalance (some have surplus and some deficit) and Teachers time-spent-teaching (TST) monitoring. Though indirectly, yet the effect of DLI 4 will have very positive effect on all students including adolescent girls from the poor and marginalized families from hard-to-reach areas including urban slums, erstwhile enclaves and TPs from the plains and the CHTs.

96. DLI 6 is focused on improved grade retention and cycle completion for disadvantaged students and for girls. This DLI is in line with SEDP Sub-Result Area 2.2 where MoE has identified retention and transition as a considerable challenge for female students and students

from disadvantaged background and geographical areas (TP). It is to be noted that among the underlying factors, costs of schooling play a key role, both in the form of direct costs such as tuition, contribution, accommodation, and learning materials, and indirect opportunity cost. While to offset this challenge, multiple stipend programs are implemented with varying rates and selection criteria and procedures are ongoing, yet this program needs harmonization into a single stipends program. MoE plans that the harmonized stipends program will be based on poverty-targeting selection (combination of school-based screening and Proxy Means Testing (PMT)), to the extent possible using the available poverty ID database in the country. DLI 6 provides incentives to the GOB to initiate a single harmonized poverty-targeted stipends program from Grades 6 to 12 and strengthens capacity to implement it effectively. The successful implementation of DLI 6 will have extremely positive effect amongst the adolescent girls of the disadvantaged groups, urban slums, erstwhile enclaves and the TPs living in the plains and the CHTs pursuing secondary education as the parents will be relieved of the financial burdens while the student is supported by harmonized poverty-targeted stipend. This will also have a positive effect on their retention by averting child marriage.

97. However, as the harmonized stipend system is worked out under SEDP, besides being pro-poor, it should also have a special focus on the girls (include a gender criteria) as they are victims of ‘early marriage’ and ‘Drop Out’. The proposed harmonized stipend program should have a provision to sustain girls’ enrollment and improve retention. This is to ensure that the stipend program can reach out to girls. In terms of monitoring, the proposed Program indicators should be disaggregated by gender, wherever applicable. This is to understand gender progress and support gender based decisions during implementation. The DLR on the roll-out of harmonized stipend program as well as AGP is expected to help in averting ‘early marriage’.

98. In addition, this DLI seeks to address the key issues affecting dropouts among adolescent girls. MoE handles this issue through SEDP Sub-Result Area 2.3. Adolescent girls’ program include separate girls toilets, counseling/awareness and MoE needs to develop and approve the action plan. MoE plans to design the program, pilot it and then scale-up the program in collaboration with MOHFW. The key features of the proposed adolescent girls program would likely include (a) separate functional toilets for girls; (b) inclusion of adolescent health in curriculum; (c) promotion of menstrual hygiene with disposal facilities; (d) awareness raising for students, teachers, and community; (e) formation of school-based girls’ committees supported by female guardian teacher; and (f) introduction of student and peer counseling. The adolescent girls program will be piloted in all institutions in two selected divisions by Year 3. Building on Secondary Education Sector Improvement Program’s (SESIP) achievement on Life-Skill Based (LSB), SEDP also plans to provide young girls with essential life skills to cope with reproductive health issues. To further enhance the effectiveness of these interventions, this sub-result area will also support implementation of relevant nation-wide awareness raising campaigns. The DLI will promote partnership among MoE, MoHFW and other development partners including NGOs to increase both health and education outcomes. At the micro level, services of the Upazila Health and Family Planning Officers serving at the Upazila Health Complexes may be taken to educate target students on adolescent health and promotion of menstrual hygiene with disposal facilities at the local schools and colleges. MoE need to work with MoHFW through IPSC for this service. Local Administration also needs to be integrated with the process. The Program should have a provision of ensuring separate sanitation facilities for boys and girls. While constructing girls’ toilet, the Program should encourage location appropriateness of toilet, which would be the responsibility of the School Headmaster/principal of the College and the Management Committee. DLI 6 will have very positive effect on the

adolescent girls of the disadvantaged groups, urban slums, erstwhile enclaves and the TPs living in the plains and the CHTs pursuing secondary education.

99. The opportunities of the Program are manifold. The Program creates the following opportunities for the target group namely the VG (adolescent girls from the urban slum, hard-to-reach areas) and the TP/IP and the community at large including family, tribe, and social entities including the mainstream population. Specifically, some of the important social benefits are as follows:

- The Program creates opportunities by the relevant stakeholders to review the Program through using Gender and Vulnerability Lenses.
- This Program creates a scope for attaining gender parity at secondary education level through sustained persuasion by GoB, IDA and the people at large.
- Creating conditions whereby mainstream students become educated and sensitive to the needs of the VG and TP.
- The Program will create an environment of Social inclusion and Civic Engagement where the Program can be refined basing on the inputs received.
- Life and living of the adolescent girls residing in urban slums and hard-to-reach areas including erstwhile enclaves and pursuing secondary education will be improved.
- Society will be more conscious about the adverse effects of child marriage and spontaneous resistance would grow in the community.
- There would be a healthy environment in the society, as people will voluntarily reject Eve Teasers and street mongers.
- The Program will create opportunities to identify needs of the students through free, prior, and informed consultation with them and the affected VG and TP communities at each stage of the Program.
- The Program will create opportunities for the training of teachers in English, Mathematics and Science subjects besides understanding the social and cultural differences of different communities. This will in turn develop a more accommodative society. The Program will also sensitize teachers about adolescent girls special needs as they pursue secondary education.
- The Program will create opportunities by ensuring that the TP communities in general and their social, cultural and organizations are included and their concerns including cultural conflicts/ adverse impacts of the Program are addressed before implementation of the Program.
- The Program will create opportunities for procurement through community procurement method.

- The Program will create opportunities for averting child labor and dropout cases through providing stipend/tuition fees to the poorer group of students, particularly the adolescent girls.

100. These opportunities can only be obtained through:

- **Inclusion.** All stakeholders including parents, students, teachers, school committee, local administration, political leadership, community and religious leaders (Headman, Karbari, Imam of the mosque and Vante of the Kiang Ghars) local law enforcement agencies etc. need to discuss the issue holistically and come up with workable solution to ensure zero drop-out from primary to secondary level education. IEC in the community in the form of communicating through the use of PA equipment, printing and hanging posters/banners, conducting street drama, using local FM Radio to communicate importance of girls' access to secondary education, distributing leaflet about access to secondary education by girls and its social benefit, could play a vital role in mobilizing the Program.
- **Participation.** All concerned of the discussion must play their roles in ensuring a conducive social environment that allows adolescent girls to pursue secondary level education without fear of eve teasing and harassment.
- **Transparency.** The whole process including procurement using community procurement method should be transparent and the major stakeholders like USEO, Upazila Chairman, School Committee and the teachers should ensure that the Program is run transparently and effectively by taking the parents/guardians and students along.
- **Social accountability.** The Program will not succeed unless parents/guardians send their daughters to the Secondary schools and help them complete secondary education. The society has to create the ambience so that the girls, particularly the adolescents can pursue secondary education devoid of coercion and harassment.

101. **Effective Grievance Redressal System (GRS).** The GOB is committed to effective Grievance Redressal System (GRS) in its service delivery and has made arrangements of grievance and complaints using phones and SMS and web based platforms (http://www.grs.gov.bd/home/index_english). The GRM is well designed and meets the standard recommended by the World Bank. However, at the implementation level, this mechanism does not always work effectively. The citizens are not very aware of the system and are keen on using it. The officials often lack the capacity to address grievances. There is a need to strengthen the capacity of officials and raise awareness of citizens. GoB proposes to strengthen the complaints-handling system, though utilization of, among others, web-based publication of progress on grievance redress and complaints handling. At the school level, the platforms like social audits, school/college administration, School/college managing committees, Parents-Teachers Association etc. are very good channels to raise and mitigate grievances. These collective platforms are functioning well and are very effective. These are excellent vehicles for effective GRM at the micro level.

SECTION V: OPERATIONAL PERFORMANCE AND INSTITUTIONAL CAPACITY ASSESSMENT

a) The World Bank's Policy for PforR Financing requires that all PforR operations to 'Operate within an adequate legal and regulatory framework to guide environmental and social assessment at the Program level'. Drawing on the information and analysis presented in the preceding sections, the analysis presented here assesses the Program systems' consistency with each of the six Core Principles outlined in the Bank Policy Program for Results Financing.

Core Principle 1: General Principle of Environmental and Social Management

Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in Program design; (b) avoid, minimize or mitigate against adverse impacts; and (c) promote informed decision-making relating to a program's environmental and social effects.

Program procedures will:

- Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level.

Incorporate recognized elements of environmental and social assessment good practice, including (a) early screening of potential effects; (b) consideration of strategic, technical, and site alternatives (including the "no action" alternative); (c) explicit assessment of potential induced, cumulative, and trans-boundary impacts; (d) identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized; (e) clear articulation of institutional responsibilities and resources to support implementation of plans; and (f) responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures.

Applicability

Core Principle 1 is applicable for the environmental and social management for the transforming secondary education results program. Environmental management related to installation of safe drinking water supply and sanitation facilities will be key issues in promoting sustainability of the proposed Program and adequate safeguard measures should be in place to avoid adverse impacts and health risks.

With regards to social safeguards, girls, particularly the adolescent ones including from the TP communities, hard-to –reach areas including the 111 erstwhile enclaves will be the key focus of the Program. GoB's SEDP, the Bank's TSER and other measures would encourage the adolescent girls including the TPs to access the Program with full compliance of Core Principle 1.

Analysis

- Adequate legal provisions are there to safeguard against adverse impacts of pollution activities due to civil construction (Environment conservation Act 1995, ECR 1997) and adequate guidelines and manuals are available for the procedures of providing safe water supply and sanitation in school facilities. The Department of Environment is mandated to take necessary actions for violations of the provisions of ECA 1995 and ECR 1997. Specifically, the DoE is the custodian for ensuring the drinking water quality standards as in ECR 1997. Additionally, there are DPHE guidelines and implementation manuals

adopted by DSHE that basically addresses operational procedures for installing tube wells and sanitation facilities as well as their operation and maintenance. The Water Safety Framework adopted by DPHE provides a step-by-step procedure of ensuring quality of water in small water supply systems. So the Program will operate within an adequate legal framework to guide environmental impact assessment.

- Regarding drinking water quality standards to be maintained in the tube wells, there is a discrepancy between the safe drinking water limits of Manganese concentration between Bangladesh standards (ECR, 1997) and WHO guidelines. Bangladesh standards impose a very stringent limit of 0.1 ppm, which is exceeded in most of the groundwater from tube wells in Bangladesh. On the contrary, WHO does not prescribe any safe levels of Manganese in drinking water. High manganese in drinking water has not gained any traction in Bangladesh (primarily because of lack of evidence of health effects) as opposed to arsenic contamination and no national policies or strategies yet exist regarding its mitigation. The Water Safety Framework proposes a revised limit of 0.4 ppm but till today the legally enforceable limit is still 0.1 ppm as per ECR, 1997. So, there is some uncertainty as to what should be the safe levels of Manganese in drinking water that should be considered for this Program.
- An Environmental Management Framework (EMF) was developed by DSHE for SEQAEAP, which outlines environmental safeguard activities necessary regarding provision of safe water supply and sanitation facilities in the school premises. These can aid in mitigating adverse environmental impacts from Program activities associated with tube well and latrine installation as well as their operation and maintenance. The institutional responsibilities have been clearly articulated in the EMF regarding construction and operation/maintenance of school facilities (tube wells, latrines etc.). An implementation manual has been developed with assistance from DPHE and ITN-BUET (International Training Network Centre) and adopted by DSHE, which has a detailed outline of institutional responsibilities regarding construction, operation (maintenance and monitoring) of WASH facilities in schools.
- Since the activities will involve small-scale renovation and new civil works, there is a requirement for explicit environmental screening and environmental clearance from the Department of Environment. The Environmental Assessment and Review Framework (EARF) prepared by the MoE for the ADB-supported civil works activities highlights procedures for screening, assessment, preparation of site-specific EMP and provides a clear institutional framework for monitoring safeguard activities and carrying out environmental due diligence.
- Stakeholders have been consulted with regarding the risks associated with the Program. ESSA report will be disclosed according to the disclosure policy of the World Bank.
- The Program will strengthen the grievance redress mechanism. GoB proposes to strengthen the complaints-handling system, though utilization of, among others, web-based publication of progress on grievance redress and complaints-handling Social Screening will be undertaken at the relevant schools and colleges to identify the TP students and their special needs in the plains where the TPs live in small number and also in the CHTs.
- The schools/colleges would spend the Grant from the Program through community procurement method where there would be transparency, and participation by all stakeholders.

Core Principle 2: Natural Habitats and Physical Cultural Resources

Environmental and social management procedures and processes are designed to avoid, minimize and mitigate against adverse effects on natural habitats and physical cultural resources resulting from Program.

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Not applicable. The proposed Program investments would neither impact nor convert critical natural habitats, does not generate any adverse impact on terrestrial flora. The Program will support civil works but the scope of civil works is within the existing premises of the schools. There will not be any adverse impacts on physical cultural resources.

Core Principle 3: Public and Worker Safety

Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the Program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.

Applicability:

The Program will support small-scale construction and civil works and therefore there may be issues associated with public and worker safety during construction activities. Also, there is a risk of chemical (i.e. Arsenic) and bacterial contamination through improper operation of tube wells and sanitary facilities that can expose students and teachers to health risk. Therefore core principle 3 will be applicable

Analysis:

- Civil construction activities can expose workers to various types of risks (air/dust pollution, high noise exposure, working with construction equipment and handling construction materials). There is also risk of accident and injury.
- The construction activities can also affect school activities (construction noise, dust pollution) and children's safety (children face the risk of being exposed to construction materials and equipment if not secured properly)
- Construction activities may be carried out in natural hazard-prone areas (flooding, coastal areas, hilly areas).
- Regarding provision of safe water supply and sanitation facilities, during the operation phase of the Program there is risk of exposure of chemical and bacterial contamination of suggested safeguard measures in the EMF/implementation manual are not followed properly.

Core Principle 4: Land Acquisition

Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.

Not applicable. The Program will not support any civil works activities that will require land acquisition. In such cases, the risk of impacts on loss of land/asset/ formal and informal livelihood etc., from land acquisition is not likely. This principle therefore does not apply to the Program as no land will be acquired and there will be no economic or physical displacement. Since there will be no land acquisition and the Bank will not fund any construction related project under the Program, there will not be any adverse effect

following the Core Principle 4.

Core Principle 5: Tribal People and Vulnerable Communities

Due consideration is given to cultural appropriateness of, and equitable access to, Program benefits giving special attention to rights and interests of tribal people and to the needs or concerns of vulnerable groups.

- Undertakes free, prior, and informed consultation of tribal people those who are potentially affected (positively or negatively) to determine whether there is broad community support for the Program.
- Ensures that tribal people can participate in devising opportunities to benefit from exploitation of customary resources or tribal knowledge, the latter (tribal knowledge) to include the consent of the small ethnic and vulnerable community (tribal people).

Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to Program benefits.

Applicable:

While considering the applicability of this Core Principle, the analysis found this principle is relevant. The Program will include girls, particularly the adolescents from the TP communities residing in the plains and also in the CHTs. It is important that they are included in the planning process (especially needs prioritization), implementation and monitoring of Program activities. Adequate arrangement is in place and would be further enhanced through IEC to communicate importance of access to secondary education by the girls. The Program cares for the cultural appropriateness and equitable access of the TP along with the mainstream community. Its positive attributes for the family and the society at large are embodiment of the compliance of Core Principle 5.

Core Principle 6: Social Conflict

Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

Not Applicable:

The Program's geographic scope is nationwide. As such, no particular group/community is left out. The PDO of the Program is to improve student outcomes in secondary education and the effectiveness of the secondary education system. As such, there is no scope of any form of Social Conflict.

SECTION VI: RECOMMENDED MEASURES TO STRENGTHEN SYSTEMS PERFORMANCE

102. The Program ESSA analysis presented in preceding sections identified the potential risks, opportunities and analyzed the compatibility of the Program with respect to the Core principles. Overall, the ESSA recommends that National Environmental and Social systems are acceptable for the Program implementation and adopting the PforR investment lending. However, ESSA recommends addressing institutional capacity constraints and gaps across a range of environmental and social management system limitations. These recommendations are summarized as actions to be incorporated in the Program Action Plan. Drawing upon this background, this section identifies the specific actions that are to be implemented in order to address the identified risks, gaps/challenges and needs. These options for improvement of the environmental and social management system (ESMS) have been discussed with the implementing agencies.

Measures to strengthen system performance for environmental and social management

Objective	Measures
Environmental systems management:	
Strengthen institutional capacity and compliance regarding civil works	<ul style="list-style-type: none">The current EARF developed by MoE is adequate to address environmental safeguard issues associated with small-scale civil works for the proposed PforR. However, recent assessment suggests that there are gaps in implementation of various environmental safeguard related issues during construction phase of subprojects. The incorporation of site-specific EMP in the Contractor's bidding documents must be made by EED. There needs to also be enhanced monitoring/supervision of the implementation of the works to ensure the EMPs are followed.Currently there is no maintenance policy for civil works in DSHE. Although the Program will support the establishment of a 5 year need based infrastructure development plan, it is essential that a maintenance policy is also in place. Development and approval of a maintenance policy can be suggested as an action under the Program.
Strengthen institutional capacity and compliance regarding provision of safe water supply and sanitation	<p>Several gaps in EMF implementation identified over past assessments should be addressed by strengthening institutional capacity for environmental compliance and oversight. These areas are the following:</p> <ul style="list-style-type: none">All tube wells should be screened annually and interventions should be taken at schools where the tube wells have been found damaged/choked up. Government's program should have a provision of testing arsenic in every institution's water facilities.Replace all arsenic contaminated tube well and take necessary action for mitigation as per Bangladesh National Policy for Arsenic Mitigation, 2004.For existing sanitation facilities, the drainage systems need to be improved to prevent waterlogging. This may be included in the maintenance policy of civil works

	<ul style="list-style-type: none"> • For existing tube wells, the drainage system needs to be improved to prevent waterlogging. This may also be included in the maintenance policy of civil works. • For working tube wells with damaged bases, interventions should be taken to repair and prevent contamination. This is to be included in the maintenance policy of civil works. • As per standard practice, handwashing facilities should be available at all latrines and in proper working conditions • Provisions for menstrual hygiene management should be made in schools. • It should be ensured that for new installations of either tube wells or latrines, the minimum safe distance between the two should be maintained as per standard practice. For existing facilities where the standards have not been made, the tube well water should be continuously screened for bacterial contamination and adequate water treatment (filtering, chlorination) should be adopted where water has been found to be bacteriologically contaminated. <p>A compliance criteria for school sanitation facility grant can be proposed for maintaining good practices of maintaining tube wells and latrines.</p>
Additional Monitoring	All tube wells need to be screened for bacteriological contamination each year.
Hygiene promotion in all schools	The hygiene best practices should be made an integral part of the curricula. Appropriate set of hygiene promotion materials should be provided to the schools and their progress in this regard should be monitored.
Budget Allocation	<p>Budgetary provisions for monitoring should be increased to include arsenic/manganese screening of all tube wells, mitigation of arsenic from existing tube wells and testing for bacterial contamination of existing tube wells.</p> <p>There should also be budgetary allocation for environmental due diligence and monitoring for civil construction and rehabilitation works.</p>
Preparation of Environmental Safeguards operation plan	<p>With so many multiple players involved with implementation, it is important to ensure that the environmental compliance and supervision is coordinated by one agency under MoE. It is recommended that DSHE Planning division supported by Program Support Unit (PSU) will be taking the lead role to ensure environmental safeguards monitoring and supervision of the Program. The basic principles of the previous safeguard document (EMF and EARF) need to be integrated into the operational plan of the new Program. It is recommended that the PSU prepare a safeguards operational plan taking into consideration the mitigation measures, guidelines and monitoring protocols of the EMF and EARF.</p> <p>It has been assessed that the PSU does not have sufficient technical capacity for managing environmental safeguard issues. Therefore, capacity building of the PSU (dedicated focal person for environmental safeguards) needs to be done.</p>

General Awareness	Local USEOs, UAS, SMCs, PTA need to raise awareness within community and schools. As a departure point, the Program can arrange awareness trainings and workshops at field level from time to time. As a suggestion of frequency, 1 workshops/training can be arranged every six month.
Social Systems Management:	
In this Program MoE is the legal and regulatory authority to commit resources and implement actions for social management. As number of ministries is being involved, an Inter-ministerial Program Steering Committee (IPSC) would work to tie the loose ends involving actions of various ministries on the Program. The experience of working with IDA and other NGOs through SEQAEP and SEQAEP AF would be a great asset in this regard. However, shortage of adequate competent staffs and ad-hoc organizational set up to implement the Program are major weaknesses within MoE. The Program has inbuilt screening of environmental and social effects in the Program design and relevant stakeholders including IDA have been consulted from the initiation of the Program.	
Strengthen Institutional Capacity for updating Secondary Educational Curriculum	The experience of SEQAEP has given MoE enough experience and scopes for developing institutional strength in handling nationwide educational program. However, inadequate and qualified staffs remain to be a problem that has been identified by MoE and needs to be addressed effectively. The National Curriculum Policy Framework (NCPF) meant to revise and update Secondary education under curriculum MoE have to be made effective by year 1 of the Program. This will demand NCTB to be restructured with additional competent staffs to take on the task of revising and implementing curriculum for grades 6-10 by the end of the 5 th year (including dissemination of curriculum, distribution of textbooks and evidence of schools offering differentiated subjects).
Social safeguards Implementation	Though there are adequate implementation arrangements made by MoE at the macro and micro level, yet SEDP needs a dedicated social safeguards implementation mechanism. While DSHE with its DG as Program Director and PCU and PSU are established to coordinate and implement various responsibilities, it is imperative that some focal point is established to monitor social safeguard issues. It should be adequately staffed and resources so to work effectively at the micro level and provide inputs at the macro level.

Coordination amongst various ministries	<p>MoE has developed IPSC to oversee the coordination and monitoring of SEDP. Chaired by the Secretary, SHED, it will need to work at the macro level and communicate the harmonized decisions at the micro level to various GoB entities working under different ministries and elected representatives at the District, Upazila, and management committees at the schools and colleges. MoE can initiate IEC on the benefits of the SEDP in coordination with Ministry of Information (MoI), Ministry of Home Affairs (MoHA) and Ministry Public administration (MoPA) as was done by MoHFW by forming Gender, Equality, Voice and Accountability (GEVA) structure to harmonize inter-ministerial matters effectively. The print and electronic media should also be utilized. Civil societies should promote secondary education for all and voice against Eve Teasing. MoE should undertake effective and sustained IEC in the community including the TP areas. Press Information Department of the Ministry of Information could conduct street drama and air related program in Bangladesh Betar and local FM Radio to communicate importance of girls' access to secondary education. Signage of the program may be displayed at the appropriate places around the school/college. Leaflets and banners should be distributed and displayed in the urban slums and hard-to-reach areas.</p> <p>District and Upazila Law and Order Situation Review Committees may be given specific responsibilities to ensure safety and security of adolescent girls through mobilizing the society and using the law enforcing agencies. At times, Mobile Courts may be run by the administration to punish the eve teasers in situ.</p>
Integrating Local Leadership/leadership at the Micro level	<p>District Parishad Chairman and Upazila Parishad Chairmen, Union parishad Chairmen and members being people's representatives should be taken on board in furthering access of adolescent girls, particularly from the pro-poor households including VG and TP in secondary education. Local leadership has a very important role in developing people's perception to GoB/MoE run program. MoE/DSHE should use PCU to coordinate with Zonal Education Office (ZEO), district Education Office (DEO) and Upazila Secondary Education Office (USEO) to integrate local political and apolitical leadership with the SEDP. Local leadership in coordination with DSEO/ISEO, Management committees, Institutional heads etc. can work on the awareness program addressing areas namely drawback of early marriage, eve teasing, gender empowerment and importance of girls' education.</p> <p>Local leadership/local administration may be requested to educate the parents about access to secondary education by girls and its social benefits in the TP inhabited areas.</p>

Inclusion of representatives from all clusters in forming different Bodies	<p>There has to be inclusion of relevant stakeholders and the VG/TP representatives in the social management process. The appropriate framework has to be developed at the micro level by MoE/DSHE and communicated to all concerned.</p> <p>The School/College Management Committee must be organized by including personalities from mainstream population, TP representatives, women, community elders, students etc. All the discussions must be free, audience should be well informed and their prior consent should be taken while decisions are taken.</p> <p>Community Procurement method should be strictly followed while spending fund allotted to the school/college.</p> <p>Local community may arrange common transportation system for adolescent students using local transports (Bus, Motorized or RikshawVan, Boat etc.). This way girls undertaking secondary education can move together safely at low cost, while averting harassment.</p>
Systems for information disclosure and stakeholder consultation	Grants for social audit are included in the Program. The school-level social audit report provides public information on school performance and accountability. The MoE will use its existing citizen engagement mechanisms, including social audits to seek feedback and continue with stakeholder consultations on mainstreaming GEVA and social inclusion activities.
Budget	The MoE will ensure that sufficient budgets for social safeguards are allocated for institution procurements following community procurement method.
Social Safeguards Monitoring, Developing Consciousness amongst the population in favor of Secondary education.	<p>MoE to develop effective means to monitor social safeguard issues up to Upazila level. Effective arrangements to be made to educate the teachers/management committees about gender sensitivity, cultural diversity and accommodation of the special needs of the adolescent girls from the IP community pursuing secondary education. DSHE Planning division supported by Program Support Unit (PSU) could be advised to take the lead role to ensure social safeguards monitoring and supervision of the Program. This can be recommended as a PAP action.</p> <p>The society, particularly the conscious citizenry should be encouraged to conduct seminar, symposium etc. for developing consensus against child labor, child marriage, dowry, early motherhood and alike. They should also unite people in favor of completion of secondary education by the girls of all walks of life for a just and fair society.</p>

Adolescent Girls' Program	<p>The proposed Program plans to work towards improving (i) inclusion of adolescent health in curriculum; (ii) promotion of menstrual hygiene with disposal facilities; (iii) awareness raising for students, teachers, and community; (iv) formation of school-based girls committees supported by female guardian teacher; and (v) introduction of student and peer counseling. The adolescent girls program is expected to maximize social impact to the beneficiaries and therefore will need to be carefully designed and rolled out to at least two divisions by Year 3 of the Program (proposed as a DLI) and all divisions by Year 5.</p> <p>The Program supports mainstreaming students with special needs. The harmonized stipends program will support all students with special needs. The Program will support training to SMCs on inclusive education. In addition, the Program will support disabled access friendly toilets/sanitation facilities.</p>
Allocating resources for Adolescents with Special Needs	<p>There are a significant number of children in Bangladesh with special needs (e.g. children with slow mental growth, autism etc). While the physically disabled students could be merged with the mainstream students, students with mental disability would need specialized schools. The Program should work with the National Academy for Autism and Neuro-developmental Disabilities (NAAND), a project under DSHE that work with the aim of making the children with special needs self-reliant and capable to integrate to the mainstream society. Together with NAAND and other other stakeholders GoB should explore how the Program's resources may be utilized for strengthening the activities for adolescents with special needs.</p>

6.1 The Grievance/Complaint Redress Mechanism

103. GoB encourages free flow and people right to information. In view of ante 'The Right To Information Act, 2009 Bangladesh' came into effect on 6 April 2009. The right to information shall ensure that transparency and accountability in all public, autonomous and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease and good governance shall be established. In the ICT domain, GoB has developed a dedicated web portal (http://www.grs.gov.bd/home/index_english) where the aggrieved one's could register complains and seek remedial measures. All the ministries including MoE have developed Grievance Redress Service (GRS) mechanism to ensure better accountability and transparency. However, owing to the very nature and social standing of the girls, particularly the adolescents from the mainstream community and the IP, most prefer not to complain against the eve teasers, educational institution, teachers/School and College Managing Committee. To offset this taboo at the field level, citizen engagement by using the platforms like school audits, school administration, School managing committee, Teachers-Guardian Meetings at the institution premises and finally during visits by ZEO, DSEO and USEO at the institutions could be effectively used as means of GRM at the micro level (explained in detail under paragraph 100). The Program will strengthen complaints-handling system through

utilization of, among others, web-based publication of progress on grievance redress and complaints-handling.

104. Communities and individuals who believe that they are adversely affected as a result of a Bank supported PforR Program, as defined by the applicable policy and procedures, may submit complaints to the existing program grievance redress mechanism or the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address pertinent concerns. Affected communities and individuals may submit their complaint to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of the World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate GRS, please visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

SECTION VII: REFERENCES AND BIBLIOGRAPHY

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ANNEX I: LIST OF STAKEHOLDERS CONSULTED

The ESSA process includes extensive stakeholder consultations and disclosure of the ESSA Report following the guidelines of the World Bank's Access to Information Policy. Feedback from stakeholders has been instrumental in designing and revising the Program Action Plan, indicators, and technical manual.

As the main objective of stakeholders' consultations was to assess the institutional capacity and present practices of the GOB with regards to compliance with the social and environmental safeguards of the World Bank policies, relevant government officials at the Ministry and different directorate levels as well as development partners, and NGOs were consulted through focused group discussion and individual level interviews.

The list of key stakeholders is detailed in table below:

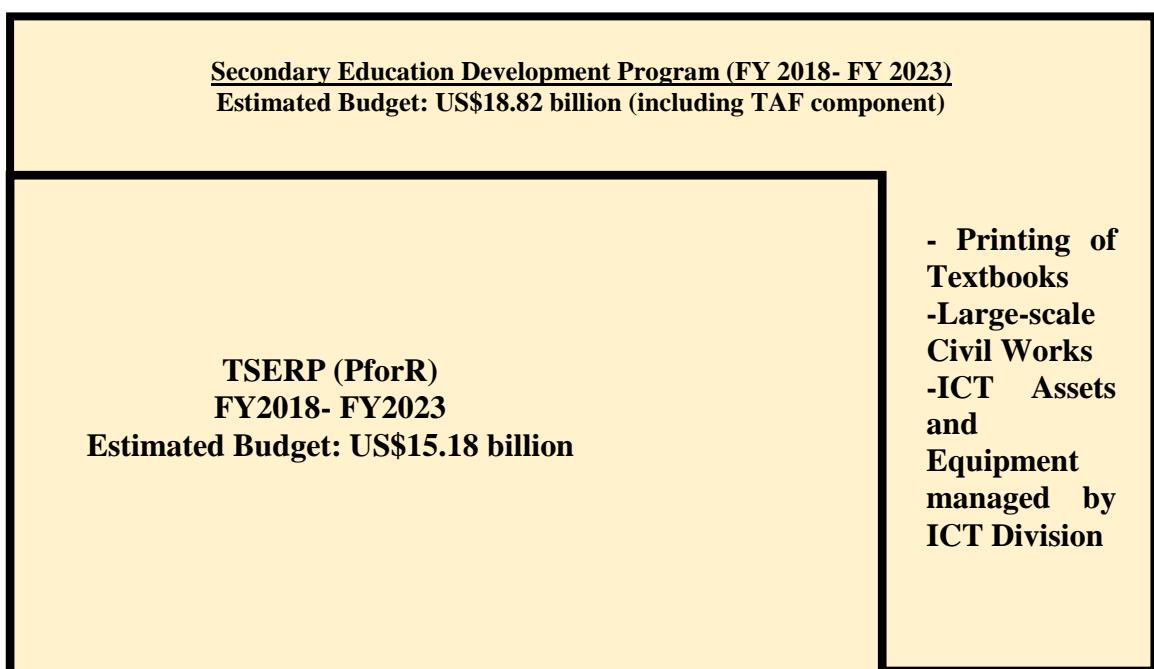
Persons met	Organization
1. Mr. Mahmudul Islam	Joint Secretary, SHED, MoE
2. Mr. Reaz Ahmed	SEQAEP, MoE
3. Ms Nasheba Selim	ADB
4. Ms Kazi Akhmila	ADB
5. Ms Farhat Chowdhury	ADB
6. Mr. Mohammad Sajjad Hossain	Project Officer, SESIP
7. Dr. Mustafa M. Kamal	Environmental Safeguard Expert, SESIP
8. Dr. J.T.A. Chowdhury	Consultant, SEQAEAP
9. Professor Salma Begum	PD, National Academy for Autism and Neuro-developmental Disabilities
10. Ms Monira Mahi	Deputy USEO Munshiganj Upazila
11. Mr. Ananta Kumar Bhoumik	USEO Munshiganj Upazila
12. Mr. Wali	MoE
13. Colonel K M Amirul Islam	Ex Principal, Jessore Model School & College, Ghatail Cantonment Public School & College and Bangladesh International School & College, Dhaka Cantonment
14. Mr. Shahidul Islam Shaheen	Mayor, Mirkadim and Chairman Governing Body, Rikabibazar Girls High School
15. Dr. Humayun Kabir, PhD (Retd)	Ex Principal Cantonment College, Jessore and Ramizuddin College, Dhaka Cantonment
16. Colonel Abu Saleh Md Rafiqul Islam	Ex Principal, Cantonment Public School & College, Banderban, CHTs
17. Colonel Golam Kibria Chowdhury (Retd)	Principal BEPZA Public School & College, Savar. Ex Principal,

	Cantonment Public School & College, Bogra; Cantonment Public School & College, Khagrachari, and Founder Coordinator, Lakers Public School & College, Rangamati, CHTs
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ANNEX II: DETAILED PROGRAM DESCRIPTION

1. The Government's Secondary Education Development Program (SEDP) will be implemented over the course of five years from the financial year (FY) 2017/18 to FY 2022/23, and it will cover grades 6-12, annually supporting more than 12 million students and 357,000 teachers from more than 20,300 general schools, 9,400 madrasahs. SEDP spans the entire activities of Ministry of Education (MoE) excluding those for higher education (post grade 12), technical and vocational education and training under the Directorate of Technical Education (DTE) and Bangladesh Technical Education Board (BTEB).
2. The Program Development Objective (PDO) is to improve student outcomes in secondary education and the effectiveness of the secondary education system (student outcomes refer to enrollment, retention, completion and learning levels).
3. The proposed World Bank supported Program (TSER) will support a subset of the Government's SEDP. The diagrammatic representation of the World Bank-supported Program scope in relation to the Government's SEDP is shown below in figure 1.1 and in table 1 of the main text.

Figure 1.1: National SEDP and World Bank supported Program Relationship



4. The proposed World Bank financing for SEDP will use the PforR financing instrument, providing a stronger focus on accountability for results and outcomes and incentivize the government ownership of critical reforms and policies in the secondary education sector. The program is structured according to three results areas: (i) enhanced quality and relevance of secondary education; (ii) improved access and retention; (iii) strengthened governance and management.

Results Area 1: Enhanced quality of secondary education

5. To enhance the quality and relevance of secondary education, the program aims to carry out a range of reforms and strategic interventions focused on curriculum, examinations and assessment, teacher development, availability of qualified teachers and teaching-learning practices particularly in Bangla, English, Math and Science. The key elements of the reforms are presented in the following subresults areas.

Sub-results Area 1.1: Improved quality and relevance of curriculum

6. Currently, there is no policy framework for systematic curriculum revision and implementation. The current secondary education curriculum is not fully integrated across different grades and subjects, not sufficiently competency-based nor benchmarked against national learning goals, and is perceived to be too heavy and thus not catering to the needs of diverse student populations. The National Curriculum and Textbook Board (NCTB) revised the secondary curriculum in 2012. Moreover, NCTB is not adequately staffed with curriculum specialists.

7. The Program aims to review and revise the secondary education curriculum for Grades 6 to 12 to promote competency based teaching-learning, make it more responsive to labor market demands, and cater to the diverse needs and aspirations of secondary school students. Building on the achievement of SESIP, a National Curriculum Policy Framework (NCPF) will be approved and implemented, which will provide policy and technical guidance on curriculum revision, including the following elements: grade-wise and subject-wise learning outcomes and competencies, diversification of curriculum, and availability of relevant subject choices. Textbooks and other instructional materials for Grade 6 to 12 will be developed to support implementation of the revised curriculum. Appropriate supplementary teaching and learning materials will be developed and disseminated, including e-learning modules. In addition, the program will support restructuring and strengthening of NCTB with special emphasis on posting of curriculum specialists based on approved staffing guidelines. This will help NCTB to carry out its primary functions on curriculum revision, instructional material development, and curriculum dissemination effectively. Existing wings of DSHE will be strengthened to undertake the implementation of curriculum, including training of teachers and monitoring of curriculum implementation, in collaboration with NCTB. The Program will finance, among others, costs for meetings, workshops and conferences, equipment and facilities for e-learning development, and trainings for relevant stakeholders.

Sub-results Area 1.2: Strengthened teacher capacity

8. The key factors limiting the development of an effective secondary education teaching force include: (a) absence of a comprehensive policy for teacher professional development (recruitment, career path, continuous professional development, pre-service and in-service teacher trainings and recognition of prior learning)¹⁶, (b) lack of harmonization in teacher training programs implemented by different projects (potential duplication, variation in quality of coverage and service delivery), and (c) inadequate capacity of existing training providers to meet the current needs for pre-service, in-serving and CPD trainings.

9. The objective of this sub-result area is to upgrade the quality and capacity of professional development training for teachers to enable them to deliver quality instructions in classrooms.

¹⁶ As of 2017, there are 14 government TTCs and 94 non-government TTCs which are offering B.Ed. courses, affiliated to National University. Some universities including Open University are also providing B.Ed. and M.Ed. courses. There are five HSTTIs providing in-service teacher training for teachers at Grade 11 and 12 levels.

The program will build on achievements of TQI and SESIP and support: (i) development and implementation of Secondary Teacher Development Policy (STDP) which outlines career paths, registration, pre-service teacher education, needs-based in-service and continuous professional development (CPD) for secondary level teachers and sustainable strategies for providing training opportunities and professional support to teachers; (ii) upgrading of pre-service training curriculum for competency-based B.Ed. and M.Ed.; (iii) strengthening of Teacher Training Colleges (TTCs) as pre-service training providers, including upgrading all the government TTCs (proposed to be renamed as Teacher Education Colleges (TECs)) to Center of Excellence (COE), and provision of training of trainers to government and non-government TTCs through COEs; (iv) provision of in-service teacher training for CPD to all the secondary-level teachers; and (v) upgrading and strengthening of Higher Secondary Teacher Training Institutes (HSTTIs) to expand and improve delivery capacity for quality in-service trainings. Training Wing, DSHE will be responsible for managing the implementation of this sub-results area by mobilizing field-level agencies and suitable partner agencies and training providers (public and private). The Program will finance, among others, workshops and conferences, costs for training for trainers and teachers, and equipment and materials for teacher training.

Sub-results Area 1.3: Improved teaching-learning in Bangla, English, Mathematics and Science

10. Student learning outcomes in some key subjects like English, mathematics and science remain much below the expected learning levels. There is a shortage of qualified teachers in these subjects, particularly in rural areas. Declining enrollment in science subject is a serious concern for the country. Reading habits and proficiencies among children are still limited due to lack of age-appropriate reading materials, particularly in rural areas.
11. This sub-result area aims to strengthen teaching and learning of Bangla, English, Mathematics and Science. Activities supported under the proposed SEDP would include: (i) DSHE/MoE to formulate and implement a strategic plan for improving teaching and learning in Bangla, English, mathematics and science; (ii) building on the success of SEQAEAP project, deploy qualified and trained additional teachers¹⁷ for these subjects to at least 4,000 needy schools throughout the country based on needs assessment of institutions; (iii) building on the SESIP experience, scale up the Practical Science Teaching (PST) program to all secondary-level institutions; (v) expand Developing Reading Skills (DRS) program nationally based on the experience of SEQAEAP project; and (v) pilot and scale up English listening and speaking laboratory program to 1,000 schools to improve teaching and learning for practical English skills. The Program will finance, among others, remunerations, other pays and administration costs for additional teachers, training for additional teachers and science teachers, provision of equipment and materials for PST, provision of books and library equipment for DRS program, and provision of English laboratories.
12. Support for additional teachers will include (a) recruitment and remuneration, (b) pre-deployment training, (c) supply of instructional materials, and (d) incentive for remedial classes. PST program would support: (i) supply of science equipment to institutions, (ii) training of science teachers on PST, (iii) organizing of school-based science groups, and (iv) organizing science fairs at national and district levels. SEDP plans to retain existing ACTs/RTs through a special government order in order to ensure classroom learning

¹⁷ Additional teachers will be hired on temporary contract basis.

sustainability. The program will also promote use of ICT in teaching and learning in all subjects. Building on SEQAEPI achievement, DRS program will be rolled out in phases to all secondary-level institutions to enhance the reading habit and reading competencies among secondary students. DRS program will include the provision of age-appropriate books, training of librarians, libraries and digital libraries, as well as monitoring of reading habits by tracking the numbers of checked-out books. DSHE will implement the DRS program in partnership with an external partner agency such as BSK.

Sub-results Area 1.4: Improved classroom assessment procedures and national learning assessment and examinations

13. The current large number of public examinations in secondary education (grades 8, 10 and 12) in Bangladesh tend to encourage memorization and rote learning oriented educational practices. Examinations in Bangladesh are also not standardized with the implication that they are not comparable across multiple boards and across time. Learning Assessment of Secondary Institutions (LASI) has been initiated under SEQAEPI but needs further strengthening and institutionalization. In addition, there is a need to introduce a school-based assessment for students such as Continuous Assessment (CA) and a school-based diagnostic assessment for students starting grade 6 to gauge their readiness for secondary school.

14. The objective of this sub-results area is to strengthen classroom assessments, undertake examination reforms and institutionalize a large-scale credible learning assessment system. The program will support: (i) formulation and implementation of a national examination plan for secondary-level examinations (JSC, SSC, HSC); (ii) facilitate a move towards international best practice and standardization of examination across subjects, years and boards (standardization of test items, administration, marking process, results); (iii) implementation of continuous classroom assessment (CA); (iv) capacity development of Board of Intermediate and Secondary Education (BISE) based on its capacity assessment; (v) establishment of National Assessment Center (NAC) as a statutory body for examination and learning assessment; (vi) implementation of Learning Assessment of Secondary Institutions (LASI) (proposed to be renamed as National Student Assessment (NSA)); and (vii) introduction of school-based Diagnostic Assessment (DA) at Grade 6. The Program will pilot and scale up DA in phases to cover all secondary-level institutions. The Program will finance, among others, costs for meetings, workshops and conferences, trainings for BISE/NAC personnel, provision of equipment and facilities for NAC, and costs for undertaking and disseminating NSAs.

15. Key LASI/NSA activities will include: (a) strengthening of design and analysis, as well as feedback to policy makers and quality improvement process, (b) implementation every two years (2019 and 2021) on nationally representative samples of Grade 8 and 10 students in Reading of Bangla, English, and Mathematics, and also on contextual factors that may influence student learning, (c) utilization of LASI results as a long-term monitoring tool to measure improvement in learning outcomes, and (d) align LASI with the requirement of SDG indicators.

Sub-result area 1.5: Improved labor market relevance

16. To address the issue of limited relevance of secondary education in the labor market, this sub-results area aims to impart employable skills to secondary level students in order to improve the labor market outcomes of those who choose to enter workforce. In this context, SESIP has initiated the pilot on pre-vocational and vocational (PVV) education for secondary-level students in 640 institutions (with new classrooms, equipment, training and two teachers for SSC PVV). SEDP will support the implementation of this pilot and will

scale up the program in additional 640 institutions. DSHE will implement the PVV program in coordination with Directorate of Technical Education (DTE) and other provider agencies. The Program will finance, among others, workshops and trainings, and provision of equipment for PVV.

Other sub-result areas and interventions

17. Production of the textbooks will be managed by NCTB, and will be outside of the PforR boundary as printing of textbooks and subsequent distribution to schools have been carried out as routine activity by MOE on a regular basis and the World Bank is not expected to add significant value to the printing process.

18. The government program will also support the establishment and operationalization of ICT Learning Centers (ILCs) and provision of e-learning materials (five subjects) in 640 schools, the program would expand to another 640 schools during the implementation period. The purchase of ICT goods/equipment will be outside of the PforR boundary as this is under the purview of the ICT Division of the government which has been supplying a large volume of ICT equipment to education institutions. The PforR Program will however support the utilization of ICT by administrators and teachers in teaching and school management activities.

Result Area 2: Improved equitable access and retention

19. Despite the remarkable improvement in access to secondary education, equitable access for children from disadvantaged background and retention particularly for female students remain as significant challenges for the sector. The program primarily aims to increase cycle completion especially for females and secondary enrollment in disadvantaged areas.

Sub-result Area 2.1: School infrastructure development

20. Physical facilities of non-government secondary-level institutions remain inadequate, while civil works management capacity of Education Engineering Department (EED) needs strengthening, and the system for needs-based school infrastructure development is yet to be institutionalized. The policy guidelines on national educational institution construction needs to be implemented, focusing on needy institutions. All school infrastructure development will be needs-based.

21. The objective of this sub-results area is to improve capacity for needs-based institution infrastructure development (classrooms, water and sanitation facilities, other facilities). SEDP interventions include: (i) EED re-organization and capacity development (decentralization, introduction of e-GP, and monitoring); (ii) implementation of National Education Institution Construction and Maintenance Guidelines; (iii) piloting of public and private partnership (PPP) model in institution construction; and (iv) planning of needs-based infrastructure development (classroom construction and refurbishment). Needy institutions will be identified based on the needs assessment using Secondary School Quality Standard (SSQS) and school mapping to be undertaken. DSHE will be mainly responsible for needs identification and planning for infrastructure development. The Program will finance, among others, trainings for EED officers, and meetings and workshops for the Guidelines and needs-based infrastructure development.

Sub-result Area 2.2: Improved access and retention

22. Despite the significant expansion of enrollment in secondary education, retention and transition remain as a considerable challenge especially for female students and students from disadvantaged background and geographical areas. Among the underling factors, costs of schooling play a key role, both in the form of direct costs such as tuition, contribution, accommodation, and learning materials, and indirect opportunity cost. Furthermore, social factors, such as early marriage and season-related absences have a significant impact of retention of both girls and boys. Currently, multiple stipend programs are implemented with varying rates and selection criteria and procedures.

23. The objective of this sub-result area is to address the issue of low transition from primary to secondary school, and low retention at higher grades particularly for children from disadvantaged backgrounds. The proposed program will harmonize the currently implemented multiple stipends schemes with varying rates and modalities into a single stipends program. The harmonized stipends program will be based on poverty-targeting selection (combination of school-based screening and Proxy Means Testing (PMT)), to the extent possible using the available poverty ID database in the country¹⁸. The harmonized stipend program will be implemented in all upazilas from the first year covering from Grade 6 to Grade 12, and administered using a harmonized stipend operations manual. One of the compliance criteria will be remaining unmarried. Disbursement of stipends to beneficiary students will be based on award confirmation forms (ACF). A mechanism will be established to verify compliance through grant management system. Third party verifications will be undertaken at the baseline and end-line to assess the extent of inclusion and exclusion errors and compliance with eligibility criteria. It is expected that around 30% of total students will benefit from the harmonized stipend program annually. DSHE's proposed Stipend Unit, supported by engagement of external partner agencies for PMT data processing, verification, and stipend disbursement¹⁹, will be responsible for implementation of the harmonized stipend program. Transition plan will be in place to strengthen the capacity of stipend management of DSHE. The Program will finance, among others, provision of stipends to students, operation costs of beneficiary selection and database management, costs of stipend disbursement, and costs of stipend beneficiary verifications.

Sub-result Area 2.3: Enhanced cycle completion for girls

24. Health problems including those related to menstrual hygiene, undernutrition and emotional issues are a major barrier to girls' school attendance, retention and learning. Although the proportion of women marrying in their early teens continues to decline gradually, one third of Bangladeshi adolescent girls start child bearing at a very early age, as teenagers. In Bangladesh, adolescent fertility is at 80.6 births per 1,000 girls who are 15-19 years of age. The purpose of this sub-result area is to design and implement adolescent girls program to address the key health issues affecting dropouts among adolescent girls.

25. The proposed program will design, pilot and scale-up the adolescent girls' program in collaboration with Ministry of Health and Family Welfare. The key features of the proposed adolescent girls program would include (a) provision of supplementary incentives for female students; (b) separate functional toilets for girls to reach a national minimum standard of 1 toilet for every xx students; (c) inclusion of relevant adolescent health topics in curriculum including sexual and reproductive health, gender equity, good nutrition and staying fit; (d)

¹⁸ BBS's National poverty ID database is expected to be available from 2018

¹⁹ Union-level local government may also be engaged as partners for verification

promotion of menstrual hygiene with disposal facilities in schools and at home; (e) promoting positive student relationships and tackling bullying and gender-based victimization (f) inclusion of adolescent health in teachers' ongoing professional development (g) awareness raising around adolescent health and health services for students, teachers, and community; (h) formation of school-based girls committees supported by female guardian teacher; (i) introduction of student and peer counseling; and (j) initiating nutrition services for girl students to address underweight and anemia; (k) promoting links between schools and local health services.

26. The adolescent girls program will be piloted and evaluated in selected 16 upazilas, and scaled up nation-wide in phases to at least 50% of secondary-level institutions. Building on SESIP's achievement on Life-Skill Based (LSB), SEDP would also support expansion of the LSB program by training all secondary and madrasah teachers to provide young girls with essential life skills to cope with reproductive health issues. To further enhance the effectiveness of these interventions, this sub-result area will also support implementation of relevant nation-wide awareness raising campaigns. DSHE will be responsible for implementing this sub-result area in partnership with Ministry of Health and Family Welfare and other development partners and NGOs. The Program will finance, among others, costs of implementing the adolescent girls program, and workshops and trainings for LSB program.

27. The program would be complemented by the Government's policy to increase the availability of female teachers in rural areas and in madrasahs (currently less than 25% of all teachers are females, much lower in rural areas and madrasahs). Teacher recruitment and deployment policy and implementation is expected to incorporate this strategic focus.

Other sub-result areas and interventions

28. The government program will support the implementation of needs-based infrastructure development (classroom construction and refurbishment) in at least 1,500 needy institutions that will be identified using SSQS and school mapping exercise. Furthermore, the government will also support other infrastructure development needs of relevant agencies and institutions, including construction of 490 USEO offices, 20 new schools and teacher dormitories in underserved areas, 13 new STTIs, and five new TTCs (TECs) as well as renovation of DSHE building and five existing STTIs. EED will administer and supervise all the civil works in the secondary education sector. The civil works under the EED are neither part of Bank's value-added nor the strategic focus, they will remain outside of the PforR boundary.

Result Area 3: Strengthened governance and management

29. Despite the remarkable expansion of secondary education, the governance, management and administration of the sector still remain fragmented, and call for further streamlining and capacity building at central, regional, and institution levels. In this context, the primary objective of this result area is to strengthen the education system for improving governance, management and administration of the secondary education sector.

Sub-result area 3.1: Strengthened decentralized education management

30. Currently, DSHE's capacity at the central level is fully absorbed by administrative tasks, leaving little to program activities, which are currently undertaken through stand-alone projects. Good progress has already been made in terms of decentralization, particularly in the areas of institutionalization of USEOs, and decentralization of MPO administration at

ZEOs through SESIP. Yet many challenges remain, including limited scope of decentralization, incomplete financial and MPO authority delegation to ZEOs, and number of posts at local offices yet to be regularized.

31. The objective of this sub-results area is to develop and implement a feasible decentralization plan towards more efficient and effective education management for secondary education. The program would support (a) strengthening of MPO decentralization at ZEOs (through regularization of field level positions, delegation of financial authority, monitoring of teacher performance), (b) capacity building and streamlining functions of DEOs and USEOs, and (c) strengthening of SMCs/MMCs through revision of management guidelines, increased resource allocation and accountability (more details in sub-results area under school management and accountability) and (d) creating similar existing post to retain decentralization efforts. The Program will finance, among others, trainings and workshops for ZEOs, DEOs, USEO, and SMCs/MMCs.

Sub-result area 3.2: Strengthened education management information system and monitoring and evaluation

32. Current education management information systems (EMIS) and M&E arrangements include: (a) Bangladesh Bureau of Education Information and Statistics (BANBEIS) which collects and publishes comprehensive statistical information on the sector covering students, teachers, and institutions, (b) DSHE's EMIS collects and maintains institution-level data on teachers (mainly MPO and training), institutions (physical facilities) and SESIP-specific project data, (c) SEQAEP collects, maintains and utilizes project-specific data on students, teachers and institutions (13 modules covering stipends, tuition and grants) with support from LGED; Directorate of Inspect and Audit (DIA) carries out performance-audit of institutions; and (e) M&E Wing (MEW) of DSHE, expected to be regularized by end of 2017, publishes monitoring reports using project-data from SESIP, SEQAEP and TQI on implementation progress; mobilizes BANBEIS to collect and publish compliance verification and annual school census data; carries out impact evaluation activities with support from survey firms.

33. The objective of this sub-results area is to enhance reliability and utilization of data systems through strengthened and harmonized EMIS and M&E systems. The program will support the following activities: (i) upgrading and maintenance of DSHE EMIS to EMIS Wing under DG DSHE (manpower, software including web-based system and integration to a uniform platform, and hardware), (ii) sample-based verification of self-reported EMIS data and school-mapping through BANBEIS; (iii) publication of annual EMIS report that will include information on students (enrollment, dropout, repetition, promotion), teachers (subject-wise, qualification, gender), school facilities (classrooms, labs, library, ISF, etc.), and school finances (including financial statements of grants); (iv) undertaking of M&E activities and publication of M&E report that will include, among others, program implementation progress (physical and financial), achievement on key performance indicators (KPIs) and intermediate outcome (IO) indicators, and compliance on eligibility and funds utilization (data to come from Grant management system); and (v) strengthening of data management and monitoring capacity at the field-level (ZEOs, DEOs, USEOs and institutions). Annual EMIS reports and Annual M&E reports will be published by April and October respectively to take stock of the status and achievements in the secondary education sector. The Program will finance, among others, provision of hardware and software to EMIS, costs of system upgrading, data verification studies, training for EMIS and M&E at central and local levels, and workshops for dissemination.

Sub-results area 3.3: Improved teacher management and accountability

34. Teachers are the most important actors in teaching and learning process. Since over 98% of secondary schools are non-government, the Government's support to secondary education comes in the form of Monthly Pay Order (MPO) system that provides teacher salary to approved MPO teacher positions. The well-intended policy and the instrument based on a public private partnership suffers from several weaknesses: (a) centralized MPO system has resulted in inequitable distribution of MPO teachers (recently MPO selection has been decentralized at ZEO, funding authority is still centralized), (b) absence of a clear mechanism to provide adequate MPO support based on actual needs, particularly for shortages of subject-based positions, resulting in a significant share of teachers financed by school fees (as a consequence, school-paid teachers are significantly underpaid relative to MPO teachers); and (c) inadequate compliance monitoring and enforcement with MPO guidelines, including performance monitoring on MPO supported teachers.

35. This sub-results area aims to rationalize the MPO system to improve equity (needs-based allocation), efficiency (of selection and payment process) and compliance. Under this sub-result area, the program will support: (i) establishment and capacity development of a Non-Government Teachers Selection Commission (NTSC); (ii) revision of MPO system and implementation; (iii) introduction of teacher performance management measures including time-spent-teaching (TST) monitoring²⁰ and teacher attendance monitoring; (iv) formulation and institutionalization of teacher career path; and (v) deployment of adequate numbers of qualified subject-based teachers. MoE will formulate and approve a MPO rationalization plan, and update the MPO implementation guidelines. The guidelines will include the following: (a) a need-based allocation of positions by schools; (b) deployment and redeployment of MPO teachers; (c) transparency in MPO teacher selection; (d) monthly payment to teachers based on compliance certificates; (e) incentives to teachers serving in hard-to-reach areas; and (f) per capita non-MPO salary grants to schools for unserved students and areas (unserved by MPO positions). A mechanism will be established to track, record, and report teachers' TST with participation of principals, teachers, and students in a transparent and sustainable way. An operations manual that details out the TST monitoring methods will be developed and piloted. Unannounced third party visits will independently cross-check the implementation of the teacher performance management. TST monitoring will be expanded to at least 50% of secondary-level institutions. The Program will finance, among others, meetings and workshops for MPO guideline rationalization, MPO teacher subventions, additional incentives for teachers, non-MPO salary grants, and administration costs of MPO processing.

Sub-results area 3.4: Improved school management and accountability

36. School Management Committee (SMC) and Madrasah Management Committee (MMC) policy has been a backbone of decentralized school management for non-government secondary institutions. However, because of inadequate financial resources and lack of proper incentives mechanisms, the SMC/MMC's role in holding teachers and schools accountable for delivery of quality education has been generally ineffective.

37. The purpose of this sub-results area is to strengthen school management capacity, promote community engagement and improve accountability mechanism. The program will

²⁰ TST monitoring will be implemented under the overarching framework of the Result-based Management (RBM) program of DSHE to be harmonized with other school and teacher performance management mechanisms such as teacher diaries.

provide to institutions: (a) accountability grants (for institutions meeting minimum accountability criteria such as SMC/PTA, social audit, EMIS data, etc.); (b) performance grants (for institutions meeting performance indicators such as student attendance, retention, teacher attendance and time-spent-teaching, student learning outcomes); (c) earmarked need-based grants to improve water and sanitation facility; and (d) earmarked non-MPO salary grants for unserved students. Implementation of the grants scheme will be supported by comprehensive School Grant guidelines which will include grants funding formula, criteria and procedure for selection of beneficiary institutions, disbursement of funds, and compliance monitoring on grants eligibility and utilization through Grant Management System. The grants scheme will be disseminated to stakeholders through education awareness and community mobilization initiatives.

38. To strengthen school management, the program will also support leadership professional development for institution heads through dedicated management training provided by National Academy for Education Management (NAEM) and other suitable agencies. The Program will finance, among others, provision of performance grants, needs-based grants, workshops and training for SMCs/PTAs, communicaty awareness raising campaigns, and training for institutions heads.

Sub-result area 3.5: Strengthened sector planning, management, and coordination

39. In the context of the proposed harmonized and results-based SEDP program, this sub-results area aims to strengthen planning, budgeting, management and coordination.

40. **Planning and budgeting:** Based on the SEDP five-year program document, annual work plan and budget will be detailed in the Annual Operational Plan (AOP) covering revenue and capital expenditures. AOP will be the basis for budget allocation, release and expenditures. Budget and Finance Committee (BFC), headed by Additional Secretary (Budget Division, MOF) will provide guidance to the implementation of AOP as needed.

41. **Sector Coordination:** Sector coordination will be enhanced through establishment and operationalization of Program Coordination Unit (PCU) at MoE and Program Support Unit (PSU) at DSHE. PCU will prepare an integrated AOP, with detailed work plan and budget allocation of program under DSHE and other implementing agencies, carry out periodic review of program implementation progress, and harmonize development partner support. PSU will manage and harmonize technical support activities across DSHE and other implementing agencies.

42. **Management capacity** will be strengthened through a streamlined program implementation structure which will include: (a) mechanism for program coordination and technical support; (b) rationalized units and manpower/staffing (with roles and responsibilities) at the central and local offices; (c) reduction of stand-alone projects and PIUs; and (iv) transition mechanism to complete the harmonization by Mid-term Review. The program implementation and management capacity will be further supported by provision of technical assistance managed by PSU at DSHE.

43. **Fiduciary management** will be enhanced through (a) regularization and capacity development of Procurement and Finance Wing (PFW) of DSHE; (b) use of iBAS++ and e-GP system for FM reporting and procurement management; and (c) establishment and operationalization of Grant Management System to ensure that funds are disbursed to eligible beneficiaries and are used for the intended purposes. The program will also support

performance audit of institutions carried out by DIA. Furthermore, independent annual fiduciary reviews and special post procurement reviews will be undertaken as necessary. The Program will finance, among others, meetings and workshops for sector planning and coordination, management trainings for central and local level agencies, iBAS and e-GP trainings, development of GMS, provision of technical assistance outside of TAF.

ANNEX III: RESULTS AREAS, INDICATORS AND MONITORING

Results Areas	Indicators	D LI #	Unit of Measurement	Baseline (2016–2017)	Year 1 (2017–2018)	Year 2 (2018–2019)	Year 3 (2019–2020)	Year 4 (2020–2021)	Year 5 (2021–2022)
PDO Indicators									
Results Area 1 Enhanced Quality of secondary education	PDO Indicator 1: Percentage of students achieving grade level competency in Grade 8 and 10 in Bangla, English and Math subjects	3	Percentage	LASI 2015 Grade 8 Bangla: 54 English: 49 Math: 57	LASI 2017 Grade 8 B:56 E:51 M:59 Grade 10: (baseline)		NASS2019 Grade 8: B: 58 E: 53 M: 61 Grade 10: (3% improved from LASI 2017)		NASS2021 Grade 8: B: 59 E: 54 M: 62 Grade 10: (5% improved from LASI 2017)
	PDO Indicator 2: Percentage of schools with TST monitoring system in place	4	Percentage	Limited teacher accountability	Implementation plan for TST monitoring approved	5%	25%	50%	60%
Results Area 2: Improved Equitable Access and Retention	PDO Indicator 3: Grade 10 and Grade 12 (of those started in Grade 6) retention rate (disaggregated)	6	Percentage	Grade 10²¹ All: 69 Girls: 66 Disadvantaged students: 62	Grade 10 All: 70 Girls: 68 Disadvantaged students: 63	Grade 10 All: 72 Girls: 70 Disadvantaged students: 64	Grade 10 All: 73 Girls: 71 Disadvantaged students: 66	Grade 10 All: 74 Girls: 72 Disadvantaged students: 68	Grade 10 All: 75 Girls: 73 Disadvantaged students: 70
				Grade 12 All: 51 Girls: 46 Disadvantaged students:	Grade 12 All: 51.5 Girls: 47 Disadvantaged students: 44	Grade 12 All: 52 Girls: 48 Disadvantaged students: 45	Grade 12 All: 53 Girls: 49 Disadvantaged students: 46	Grade 12 All: 54 Girls: 50 Disadvantaged students: 48	Grade 12 All: 55 Girls: 51 Disadvantaged students: 50

²¹ Disadvantaged students refer to beneficiary students of the harmonized stipend program.

				NA					
Results Area 3: Strengthened governance and management	PDO Indicator 4: Percentage of school grants utilized as per compliance guidelines according to GMS data and verified by citizens feedback survey		Percentage	NA	--	75	80	85	90
IO Indicators									
Results Area 1 Enhanced Quality of secondary education	IO Indicator 1.1: Cumulative number of teachers and institution heads trained (pre-service, in-service and CPD) in Grades 6-12 (core results indicator)		Number	5 HSTTI, 14 TTCs, 51 cluster center schools and 3 Resource centers currently provide training to teachers	50,000	200,000	300,000	400,000	500,000
	IO Indicator 1.2: Number of targeted schools with additional qualified and trained subject teachers deployed in English, Math and Science		Number	2,000	Strategic Plan approved	4000	5000	6000	6500
	IO Indicator 1.3: Number of institutions implementing the DRS program		Number	11,982	15,000	20,000	25,000	30,000	30,000
	IO Indicator 1.4: Percentage improvement in Reading Skills proficiency	3	Percentage	LASI 2017 will provide the baseline	LASI 2017 result			10% improved (NASS 2019 result)	10% improved (NASS 2021 result)
	IO Indicator 1.5: NASS implementation	2	Text	LASI 2017 completed	LASI 2017 results analyzed,		NASS 2019 carried out, results	NASS 2021 carried out	NASS 2021 results analyzed, disseminated and findings utilized for

					disseminated and findings utilized for quality and system improvement		analyzed, disseminated and findings utilized for quality and system improvement		quality and system improvement
Results Area 2: Improved Equitable Access and Retention	IO Indicator 2.1: Gross Enrolment Rate in Higher secondary (disaggregated)			All: 39 Girls: 36	All: 41 Girls: 38	All: 43 Girls: 40	All: 45 Girls: 42	All: 46 Girls: 44	All: 47 Girls: 45
	IO Indicator 2.2: Implementation of harmonized stipends program	6	Text ; Percentage	Multiple stipends program; with varying stipends rates, selection criteria and procedures; Single poverty targeted stipends program and operations manual developed	The first phase roll-out of implementation of harmonized stipends program	Nation-wide roll-out of implementation of harmonized stipends program for Grades 6-12	80% of stipend recipients meet compliance standards	85% of stipend recipients meet compliance standards	90% of stipend recipients meet compliance standards
	IO Indicator 2.3: Implementation of Adolescent Girls Program	6	Text ; Percentage	Drop-out rate among girls is higher in secondary education	Program designed and Action Plan approved		Adolescent Girls Program implemented in all institutions in two selected divisions		Adolescent Girls Program implemented in all divisions
Results Area 3: Strengthened governance and management	IO Indicator 3.1: Enhanced Fiduciary and Data Management	8	Text	Enhanced fiduciary system is not in place.	School Grant Management System established and	IBAS++ rolled out nationally 70% of all DDOs of	IBAS++ rolled out nationally to all DDOs of SEDP	IBAS++ is used nationally in all DDOs of SEDP	IBAS++ is used nationally in all DDOs of SEDP

				MoE as a pilot ministry for iBAS++ eGP introduced to DSHE	operational IBAS++ rolled out nationally 30% of all DDOs of SEDP 30% of non-ICB contracts initiated and completed through eGP EMIS integration and strengthening plan, including new modules approved	SEDP 40% of non-ICB contracts initiated and completed through eGP Annual EMIS and annual performance report published	100% of non-ICB contracts initiated and completed through eGP Data consistency in the EMIS improved by 30%	SEDP 100% of non-ICB contracts initiated and completed through eGP Annual EMIS and annual performance report published	100% of non-ICB contracts initiated and completed through eGP Data consistency in the EMIS improved by 50%
IO Indicator 3.2: Number of institutions receiving performance Grants for meeting minimum accountability requirements and performance indicators	5	Text , Number	Schools have low accountability standards and incentives	School Grants manual approved	1,000	5,000	7,500	8,000	
IO Indicator 3.3: Number of institutions that have adequate number of teachers as per student-teacher norms, including English, Math, and Science		Number	To be obtained from EMIS	MPO rationalization plan approved and MPO implementation guidelines updated	5,000	10,000	15,000	20,000	
IO Indicator 3.4: Harmonization of sector program implementation (Percentage reduction of stand-alone projects)	7	Percentage	NA	10	20	50	55	60	

ANNEX IV

SECONDARY EDUCATION DEVELOPMENT PROGRAM (GOB)

SOCIAL SCREENING FORM

This form will be filled up by the Headmaster of the School/Principal of the college and shall constitute an Annex to the IP /TP Screening Effort to assist World Bank's 'Transforming Secondary Education for Results' Program

Part A: General Information

- (i) Screening Date:
- (ii) Name of the Educational Institution:
.....
- (iii) District: Upazila:
- (iv) Name of the Headmaster/Principal:
.....

(vi) Names and Designation of Teachers participated in Screening:

- 01._____
- 02._____
- 03._____

(vii) Names and Designations of PMU/DSHE/NGO, if any, Participated in Screening:

- 01._____
- 02._____
- 03._____

(viii) Names of TP community members and organizations that participated in Social Screening (if any):

- 01._____
- 02._____
- 03._____

Part B: Activities

1. Major Activities using the TSER fund:

2. Click if activities include any:

MPO Stipend Tuition Fees

3. Description of the procurements using community procurement method, if any:

Part C: Social Issues

1. Will there be a need for additional lands to carry out the intended works?

Yes No
 Yes No

2. Do Tribal People (TP) live in your institute's catchment area?

Yes No

3. If there are tribal people living in your institute's catchment area, which ethnic group they belong to? (Please provide the name of all ethnic communities and their approximate number)

4. Do your proposed activities ensure equal inclusion right to the TP?

Yes No

5. Do your proposed activities pose any threat to cultural tradition and way of life of any of these tribal groups?

Yes No

6. Do your proposed activities affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds, etc.)

Yes No

7. Are there any social concerns expressed by TP community and organizations, students and teachers?

8. The TP community and organizations perceive the social outcomes of the activity:

Positive
 Negative
 Neither positive nor negative

9. Does your institute have adequate mechanism for ensuring free, prior and informed consent of the TP communities about the activities to be undertaken that would benefit/affect these communities?

[] Yes [] No

10. If “yes”, please briefly describe the mechanism.

11. In respect of the social impacts and concerns, is there a need to undertake an additional impact assessment study?

[] Yes [] No

12. In respect of the social impacts and concerns on TPs, is there a need to undertake an additional impact assessment study and prepare a Tribal People’s Plan?

[] Yes [] No

13. How many teachers and administrative staffs from the tribal community work in the school/college?

14. Are there any tribal people in the School/College management Committee? If not, do you plan to include them?

15. Do you follow community procurement method while using grant from World Bank?

Headmaster’s /College Principal’s Signature with Seal and Date:

Signature: Seal.....

Date.....