

# Combined Involuntary Resettlement and Indigenous Peoples Safeguards Monitoring Report

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Project No. 42122-013 and 42122-016  
Semestral Report  
June 2017

## Loan 2761 & Loan 3256-BAN(COL): Third Primary Education Development Project and Third Primary Education Development Project - Additional Financing

Prepared by Department of Primary Education and Local Government Engineering Department  
for the Government of People's Republic of Bangladesh and the Asian Development Bank

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# **GOVERNMENT OF THE PEOPLE'S REPUBLIC OF BANGLADESH**

## **Ministry of Local Government, Rural Development and Cooperatives Local Government Division**

### **Local Government Engineering Department**



**Madalgati GPS, Jessore**

### **Third Primary Education Development Program (PEDP 3)**

## **Social Safeguard Management Report (Jan 2017 – June 2017)**

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## **Abbreviations and Acronyms**

<b>AF</b>	Additional Funding
<b>ADB</b>	Asian Development Bank
<b>CHT</b>	Chittagong Hill Tracts
<b>DEO</b>	District Education Officer
<b>DP</b>	Development Partner
<b>DPE</b>	Directorate of Primary Education
<b>DPP</b>	Development Project Proposal
<b>EFA</b>	Education for all
<b>EMP</b>	Environmental Management Plan
<b>GOB</b>	Government of Bangladesh
<b>GPS</b>	Government Primary School
<b>IDA</b>	International Development Agency
<b>IP</b>	Indigenous People
<b>IR</b>	Involuntary Resettlement
<b>JARM</b>	Joint Annual Review Mission
<b>LGED</b>	Local Government Engineering Department
<b>MIS</b>	Management Information System
<b>MOPME</b>	Ministry of Primary and Mass Education
<b>PEDP 3</b>	Third Primary Education Development Program
<b>RNGPS</b>	Registered Non-Government Primary School
<b>SEC</b>	Small Ethnic Community
<b>SECP</b>	Small Ethnic Communities Plan
<b>SPS</b>	Safeguard Policy Statement
<b>SR</b>	Safeguard Requirement
<b>SMF</b>	Social Management Framework
<b>WB</b>	World Bank

## 1. Introduction

The Government, with support from the Developing Partners (DPs), developed and implementing the third Primary Education Program (PEDP3), a follow on program of PEDP- 2 based on the lessons learned and other related documents. PEDP-3 aims to reinforce the ongoing reforms within a well-developed policy framework based on lessons learned from PEDP-2 and specifically addresses the inclusive education agenda with a focus on deepening reforms to address the needs of the poor and other excluded groups. This Additional Financing (AF) provides funds to continue reforms and activities being implemented under PEDP- 3. The AF does not finance any new components; the natures of activities therefore remain the same though the scope and coverage is expected to be improved.

### Background

This Harmonized Social Management Framework (SMF) is proposed to deal with social safeguard issues that may arise during implementation of the PEDP- 3. It must be mentioned that the AF will not include any new component. So, no new safeguard policies would be triggered. This SMF is an updated version of the original SMF for PEDP 3, based on the findings and lessons learned from the latter. This updated SMF will be applicable for all program activities including the AF henceforth.

The objective of the AF remains the same as of PEDP 3: to further improve the country's primary education system and to provide quality education to all Bangladeshi children in every classroom. The program will be implemented over a three-to-six year period with the support of a number of development partners (DPs) including the Asian Development Bank, AusAID, CIDA, DFID, EC, JICA, Netherlands, SIDA, UNICEF and the World Bank/IDA.

It is envisaged that the program activities will trigger the World Bank's Operational Policy on Indigenous Peoples (OP 4.10) and ADB's Safeguard Requirements 3(SR3) on Indigenous Peoples Safeguards. WB OP 4.12 on Involuntary Resettlement (IR) safeguards or ADB's SR2 on the same did not trigger for PEDP 3, as all new civil works had been undertaken within the school premises, so far, and did not cause any displacement or adverse impact on livelihoods. The AF is also not expected to trigger OP 4.12/SR2, but the SMF (as was the case in the original) includes all guidelines and policies to be followed in case they are triggered. MOPME/DPE has decided that IR safeguards should be taken into account in both PEDP 3 and PEDP 3 AF, as in future, schools may need to be constructed in private or public acquired lands beyond the existing campuses. As such, consistent with the World Bank's Operational Policies and ADB's Safeguard Policy Statement (SPS2), and those of other (DPs), the SMF proposes principles, policies, guidelines and

procedure to identify and address impact issues concerning Small Ethnic Communities (SEC) and IR safeguards. The SMF will apply to the PEDP 3 and PEDP 3AF as a whole, and provide the basis to prepare and implement impact mitigation plans as and when school physical works are found to cause adverse impacts on SECs and others, including private landowners and public land users.

### **Small Ethnic Communities (SEC)**

The program has been actively working in areas where SECs live including the Chittagong Hill Tracts (CHT) where they are largely prevalent. OP 4.10/SR3 is therefore triggered for the Program. There is a dedicated database for the program with disaggregated data for SECs and gender. Although DPE carries out regular consultation with local people and designs school related civil works in a participatory manner, sub-project level SEC Plans may require to be developed in terms of documentation and reporting, based on the level of impact on IPs. Awareness raising and community level consultations with SECs are carried out regularly but the documentation is weak with regards to this.

## 2. Safeguard Measures in PEDP 3 and its Impact on SEC

The Social Management Framework (SMF) has been adopted in taking effective measures about social safeguard issues that have been encountered during the implementation of the PEDP 3 AF. Because of its activities in areas inhabited by SECs, especially in the Chittagong Hill Tracts (CHT), PEDP 3 AF applied the World Bank's Operational Policy (OP 4.10) and ADB's Safeguard Requirements 3 (SR 3) on Indigenous Peoples. PEDP 3 has not triggered OP 4.12 and SR2 on IR, so far, as all repairs works and additional classrooms have been constructed on existing school premises. PEDP 3 however did not require any land (acquired or contributed) so far. It is expected that local communities will continue to actively participate in PEDP 3 AF in the way of contributing lands. Nevertheless, DPE has decided that IR should also be taken into account in PEDP 3 and the AF activities.

Joint social screening exercise had been conducted for each sub-project (12,041 screening reports are available). LGED consults with the local community at all stages of their activities jointly with the School Management Committees (SMCs) and other relevant stakeholders. All relevant information (i.e. type of civil works, duration etc.) are displayed for community's prior knowledge and information on the sign boards in front of schools and construction sites.

Water and Sanitation facilities now fully undertaken by the Department of Public Health Engineering (DPHE). These are also not expected to have negative impact on local community people including SEC as they will not require land acquisition or displacement of any sort; all civil works relevant to this component will be carried out within the existing school premises. Provisions for female toilets and toilet for persons with disability in WASH blocks in the schools are taken keeping gender needs and special needs in consideration.

### Objectives of SMF

The principles, policies, guidelines, and procedures proposed in this SMF are to help MOPME/DPE to select, design and implement the subprojects to ensure that PEDP 3,

- Enhances social outcomes of the activities implemented under the individual subprojects;
- Identifies and mitigates adverse impacts that the individual subprojects might cause on people, which also include protection against loss of livelihood activities; and
- Ensures compliance with the social safeguards policies of World Bank, ADB, and other development partners on **Small Ethnic Community** and involuntary resettlement.



## Social Safeguard Measures and Impacts

PEDP3 comprises the following four key areas:

- (a) *Universal Access* – would aim to improve access to quality schooling with a particular focus on the poorest and the disadvantaged;
- (b) *Quality of Teaching and Student Learning* – would aim to improve the quality of teaching, the learning environment and student learning;
- (c) *Institutional Strengthening* – would aim to improve the efficiency and effectiveness of education service delivery; and
- (d) *Program Planning and Management* – which aims to improve education sector management and policy development, and strengthening monitoring and evaluation, including student learning.

The PEDP 3 component on *Universal Access* that aims to promote inclusive primary education has a particular focus on CHT. As in the plains districts, many schools in the region have seen improvements in the form of additional classrooms, separate toilets for boys and girls, clean water supply and those needed for quality learning environment. To address the current accessibility constraints, especially in the remote areas of the region, under the PEDP 3 and the AF, and based on findings from the implementation of the program so far LGED has developed a report on Hill friendly School Building designs for CHT on basis of local consultation and participatory process. The implementation of the recommendations has reduced the accessibility issue due to lack of adequate infrastructure and has encouraged horizontal expansion of schools where required in an appropriate way. Moreover, this has also facilitated teacher recruitment and retention for schools in the remote areas.

Applicability of OP 4.10 and ADB's Safeguard Requirement 3 (SR3) in the plains districts and CHT will in general depended on (i) the presence and prevalence of SECs in the close vicinities of the schools that are undertaken for expansion/improvements as well as location and sites of the new schools; and (ii) whether or not the required physical works would affect them in manners to threaten their cultural way of life and restrict access to their livelihood activities. Given their scope for individual schools and availability of *khas land in* CHT, it is assumed that the civil works are highly unlikely to cause impacts that would threaten SECs in any significant manner. Yet, in view of the uncertainty DPE has decided to formally adopt this framework outlining principles, policies, guidelines and procedure to identify the impact issues and potential risks and, if required, formulate and execute Small Ethnic Communities Plans. This will apply whenever physical works for existing and new schools in CHT or plains districts are found to cause adverse impacts on Small Ethnic Communities. The purpose of the Plan(s) furthermore will be to enhance

as much as is feasible the possible benefits of the program in a manner that is tailored to their social and cultural norms.

### **Screening & Mitigation Guidelines**

To the extent feasible, DPE (i) avoided subprojects that will require private land acquisition; (ii) carry out the extension/renovation works in the lands already owned by schools; (iii) use their own or other public lands for building new schools. Where adverse impacts could not be avoided completely, DPE screened all the subprojects to identify the potential safeguards issues and impacts by using a specified instrument (**Annex A**) and, if required, prepared and implemented impact mitigation plans as per the guidelines provided in this SMF.

Where screening results indicated potentials of adverse impacts, MOPME/DPE's action on a school was consistent with the following sets of guidelines.

- **Framework for SECs Plan.** Consistent with OP 4.10 and SR3, it provides principles and guidelines to identify and deal with adverse impacts on IPs, and a consultation framework for adoption of mitigation and development measures; and
- **Guidelines for Land Use & Impact Mitigation.** Consistent with the Bangladesh Land Acquisition Ordinance, 1982, OP 4.12, and SR2, it provides principles, policies and guidelines for use of public and private lands and adverse impact mitigation; mitigation measures and standards; mitigation plan requirements and preparation process; implementation and monitoring arrangements for mitigation plans.

### 3. Framework for Small Ethnic Communities Plan

#### Background

Bangladesh is rich in cultural diversity due to presence of different Small Ethnic Communities who are also known and addressed as the Adivasis/ Tribal. They are diverse in their culture, language, religion, traditions and patterns of social, economic and cultural life. In the recent National Poverty Reduction Strategy Paper adopted by the Government of Bangladesh, the term “adivasi/ethnic minorities” was used. Tribal peoples, both from the CHT and the plains, increasingly refer to themselves as Small Ethnic Communities in English, and as *adivasis* in Bangla.

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. Chakma, Garo, Manipuri, Marma, Munda, Oraon, Santal, Khasi, Kuki, Tripura, Mro, Hajong and Rakhain are some of the well-known adivasi/small ethnic communities of Bangladesh. In the census of 2011, Bangladesh government identifies 29 SECs of population 1,586,141. Different reports provide different numbers of tribal/ethnic minority population and it is estimated to be around 2-3 million. For the purposes of this document they have been referred to as Small Ethnic Communities (SEC).

SECs comprise about less than 1% (3 million) of the population of Bangladesh living mainly in the Chittagong Hill Tracts (CHT) and in rural communities in Mymensingh, Sylhet, Dinajpur and Rajshahi. The small ethnic communities in CHT possess separate identities, specific racial backgrounds, different languages, and distinct heritage and culture. The largest groups are the Chakmas, Marmas, and Tripuras. They differ in their social organization, marriage customs, birth and death rites, food and other social customs from the people of the rest of the country. There is lack of information on their socio-economic indicators. These communities largely speak Tibeto-Burman languages.

The indigenous peoples everywhere are generally poorer than the mainstream peoples. Most indigenous peoples in CHT live in settlements in remote hills and valleys that are very difficult to access, they still use lands for living and livelihood under the traditional/customary tenure not recognized in the country’s land administration system. The areas they inhabit, especially in CHT, are generally characterized by poor basic infrastructures like roads, schools, water supply and sanitation, health care facilities and markets

Applicability of OP 4.10 and ADB’s Safeguard Requirement 3 (SR3) in the plains districts and CHT will in general depend on (i) the presence and prevalence of SECs in the close vicinities of the schools that are undertaken for expansion/improvements as well as location and sites of the

new schools; and (ii) whether or not the required physical works would affect them in manners to threaten their cultural way of life and restrict access to their livelihood activities. Given their scope for individual schools and availability of  *khasland in CHT*, it is assumed that the civil works are highly unlikely to cause impacts that would threaten SECs in any significant manner. Yet, in view of the uncertainty DPE has decided to formally adopt this framework outlining principles, policies, guidelines and procedure to identify the impact issues and potential risks and, if required, formulate and execute Small Ethnic Communities Plan. This will apply whenever physical works for existing and new schools in CHT or plains districts are found to cause adverse impacts on indigenous peoples.

### **Objectives of Small Ethnic Communities Plan**

The objective of ADB and World Bank's SEC Safeguards policies is to design and implement projects in a way that fosters full respect for SECs identity, dignity, human rights, livelihood systems, and cultural uniqueness as defined by the Small Ethnic Communities themselves so that they (i) receive culturally appropriate social and economic benefits, (ii) do not suffer adverse impacts as a result of projects, and (iii) can participate actively in projects that affect them.

Keeping consistency with the above safeguard requirements, the main objectives are to ensure that the program activities in general, and the physical works in particular, do not adversely affect Small Ethnic Communities, and that they receive culturally compatible social and economic benefits. This will require DPE to carefully select and screen all schools and their locations and sites, that are to be expanded or built anew, and determine presence of Small Ethnic Communities in the school localities and ensure their participation in the civil works selection and implementation processes. Depending on prevalence of Small Ethnic Communities- and their needs and concerns – this will be assessed through consultations.

### **Small Ethnic Communities Plan**

Selection of expansion works and other improvements and location of new schools will largely indicate whether or not, or in the manner, indigenous peoples would be benefitted or adversely affected. Wherever affected adversely, in the plains or CHT, DPE will prepare and implement Small Ethnic Communities Plans (SECPs) in accord with the principles, guidelines and procedure outlined below. To avoid or minimize adverse impacts and, at the same time, ensure culturally appropriate benefits, DPE will select, design and implement the physical works in adherence to the following principles:

- Fully include indigenous peoples communities in general and their organizations in the process leading to identification, planning and implementation of expansion/improvements works and locations and sites of new schools and dormitories for children and teachers;

- Carefully screen, together with indigenous peoples, the required physical works on existing schools and locations and sites of new ones for a preliminary understanding of the nature and magnitude of potential impacts, and explore alternatives to avoid or minimize any adverse impacts;
- Where alternatives are infeasible and adverse impacts are unavoidable, immediately make an assessment of the key impact issues jointly with indigenous peoples and others knowledgeable of indigenous people cultures and concerns;
- Undertake the tasks necessary to prepare IPPs with the most appropriate measures to mitigate the adverse impacts and, if opportunities are there, development measures for the general SECs; and
- Not undertake civil works where the SECs remain unconvinced about the benefits to offer broad support for the project

## **4.0 The Sub-Projects under PEDP 3**

### **4.1 Sub-project Description**

Under PEDP-3, additional class rooms are being constructed to reduce overcrowding in the class rooms. These are basically of two types, vertical extension and horizontal extension. In case of horizontal building, the design types are for plain land, coastal, Char and hill. In hill area where lands are more or less plain, plain land design of building type is being implemented. But in hilly area where the construction material is difficult to carry schools are being constructed by pre-fabricated post and truss with tin shed roofing. In case of horizontal extension, the placement of the new infrastructure is very important to maintain a good school environment especially in the backdrop of land scarcity in a densely populated country like Bangladesh. It should also be kept in mind that the schools are not only buildings but they are a combination of many items such as a playground which offer learning opportunities. So it is highly recommended that the possibility of vertical extension should be explored first so that land can be made available for a play ground. Only if that seems to be unfeasible, a horizontal extension can be considered. LGED is constructing school cum cyclone shelters in the cyclone prone areas and school cum flood shelters in the flood prone areas. In such cases, the ground floor of the school is kept open and the class rooms are built at the 1<sup>st</sup> floor. The ground floors of such buildings are used for various community activities during the normal time.

### **4.2 Sub-project Location**

The PEDP3 is being implemented all over Bangladesh. However, the schools are selected and prioritized based on the certain parameters. Criteria for prioritization and development for all categories of PEDP-3 infrastructures development are given below. These criteria were developed in consultation with the Director (Planning and Development) of the DPE, MoPME and consultant of The World Bank:

- School is not overcrowded
- Every primary school should have at least four classrooms with one teachers' room
- Minimum ratio of classroom versus student is 1:40 with flexibility up to 40% in the case of overcrowding which increase the ratio 1:56.
- School is having a minimum number of four school teachers
- One school is considered for every 2,000 people in a catchment having no school within a periphery of 2 km.
- A single infrastructure community school in a dilapidated condition should receive priority only for the first year of the program.
- Hilly and coastal areas, chars and haors are the prioritized areas

- A primary school having a minimum of 230 students receives priority
- Availability of sufficient land for horizontal/vertical extension of classrooms is a priority qualification
- A primary school contributing to the regional disparity removal receives preference.

The cumulative list of 12694 schools screened up to June, 2017 is shown in Table-1. The geographical distribution of the schools is presented in a map of Bangladesh in Fig. 1.

**Table 1: District wise list of Schools and Classrooms (Cumulative)**

RegionName	DIST	Total Sch	Ver	Hor	Total CR
BARISAL	BARISAL	443	498	847	1345
BARISAL	BHOLA	293	330	597	927
BARISAL	JHALOKATHI	66	44	166	210
BARISAL	PEROJPUR	145	103	377	480
BOGRA	BOGRA	167	132	437	569
BOGRA	JOYPURHAT	36	27	78	105
BOGRA	PABNA	203	245	378	623
BOGRA	SERAJGONJ	469	463	1296	1759
CHITTAGONG	BANDARBAN	140	148	388	536
CHITTAGONG	CHITTAGONG	406	699	654	1353
CHITTAGONG	COX'S BAZAR	116	120	190	310
CHITTAGONG	KHAGRACHARI	125	139	342	481
CHITTAGONG	RANGAMATI	209	181	627	808
COMILLA	BRAHMONBARIA	324	499	517	1016
COMILLA	CHANDPUR	261	364	459	823
COMILLA	COMILLA	451	684	751	1435
COMILLA	FENI	88	103	181	284
COMILLA	LAXMIPUR	167	219	337	556
COMILLA	NOAKHALI	418	502	897	1399
DHAKA	DHAKA	257	596	387	983
DHAKA	GAZIPUR	144	198	269	467
DHAKA	MANIKGONJ	138	175	293	468
DHAKA	MUNSHIGONJ	133	246	281	527
DHAKA	NARAYANGONJ	200	416	343	759
DHAKA	NARSHINGDI	201	249	366	615
DINAJPUR	DINAJPUR	128	99	335	434
DINAJPUR	NILPHAMARI	201	215	375	590
DINAJPUR	PANCHAGARH	75	74	158	232
DINAJPUR	THAKURGAON	115	142	205	347
FARIDPUR	FARIDPUR	238	242	559	801
FARIDPUR	GOPALGONJ	155	142	352	494
FARIDPUR	MADARIPUR	205	260	420	680
FARIDPUR	RAJBARI	83	80	187	267
FARIDPUR	SHARIATPUR	134	207	273	480
JESSORE	CHUADANGA	51	52	104	156
JESSORE	JESSORE	120	88	294	382
JESSORE	JHENAIDAH	90	91	185	276
JESSORE	KUSHTIA	115	148	270	418
JESSORE	MAGURA	61	45	149	194
JESSORE	MEHERPUR	35	39	87	126
KHULNA	BAGERHAT	210	203	503	706
KHULNA	KHULNA	183	172	444	616
KHULNA	NARAIL	87	72	218	290
KHULNA	SATKHIRA	156	139	420	559
MYMENSINGH	JAMALPUR	248	221	623	844



MYMENSINGH	KISHOREGONJ	339	475	553	1028
MYMENSINGH	MYMENSINGH	558	647	1123	1770
MYMENSINGH	NETROKONA	258	255	558	813
MYMENSINGH	SHERPUR	115	87	270	357
MYMENSINGH	TANGAIL	379	405	788	1193
PATUAKHALI	BARGUNA	158	83	405	488
PATUAKHALI	PATUAKHALI	179	152	429	581
RAJSHAHI	C. NAWABGONJ	94	107	253	360
RAJSHAHI	NAOGAON	106	74	254	328
RAJSHAHI	NATORE	70	51	163	214
RAJSHAHI	RAJSHAHI	81	73	192	265
RANGPUR	GAIBANDHA	437	464	942	1406
RANGPUR	KURIGRAM	366	309	872	1181
RANGPUR	LALMONIRHAT	91	121	135	256
RANGPUR	RANGPUR	247	302	426	728
SYLHET	HABIGONJ	265	226	570	796
SYLHET	MOULVIBAZAR	108	88	242	330
SYLHET	SUNAMGONJ	255	243	529	772
SYLHET	SYLHET	298	387	451	838
Total		12694	14660	26774	41434

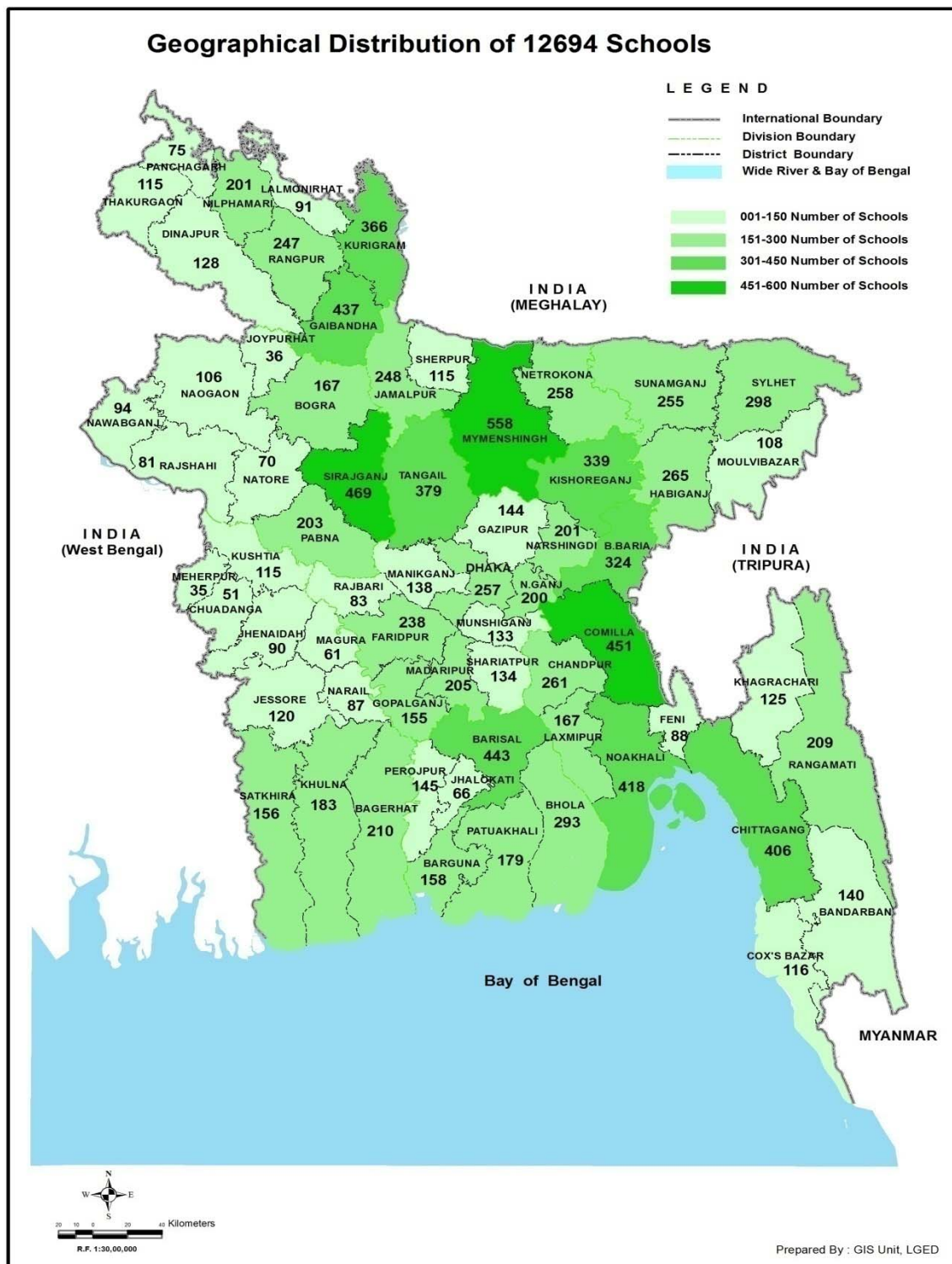


Fig 1; Geographical distribution of 12694 schools

## 5.0 Screening of the Sub-projects

### 5.1 Social Safeguard Screening (Cumulative) under PEDP 3

This report covers social screening of total 12, 694 schools out of which, 10536 nos. (83%) are located in the plain land and 1016(8.0%) schools in hill region. In the Haor area the number of school is 508 which are 4% of total school. School number in coastal area is 634 which are 5.0%. The total scenario based on the above 4 regions can be seen in the Pie chart 1(Fig.2).

Out of total 12,694 schools under PEDP 3, the distribution on basis of type of Classroom construction, total no. of horizontal class rooms is 26,774 which are 64.62% similarly in case of vertical construction the nos. of classroom is 14660 which is 35.38% of total classrooms. The Pie chart no.2 (Fig.3) depicts the scenario.

The screening formats which have been received from the field, it is observed that there is no case of land acquisition required for the construction of schools, therefore there is no case of resettlement or migration of people is reported. Finally it can be concluded that the Involuntary Resettlement (IR) is not an issue of concern in PEDP 3.

### 5.2 Cumulative Social Safeguard Management Status

During the period from Dec 2012 to June 2017, social safeguard screenings of total 12,694 schools have been performed through social safeguard screening format. The region wise status is shown in Table 2 below:

**Table 2: Cumulative Status of Social Safeguard Screening of Schools**

Region	Total schools	Distribution of school on the basis of SEC	
		All or Majority Mainstream students	Majority Small Ethnic Community students
Barisal	947	919	28
Patuakhali	337	311	26
Bogra	875	790	85
Rajshahi	351	264	87
Chittagong	996	843	153
Comilla	1709	1634	75
Dhaka	1073	1038	35
Dinajpur	519	469	50
Faridpur	815	743	72
Jessore	472	447	25
Khulna	636	582	54
Mymensingh	1897	1750	147
Rangpur	1141	1113	28
Sylhet	926	804	122
<b>Total</b>	<b>12694</b>	<b>11707</b>	<b>987</b>

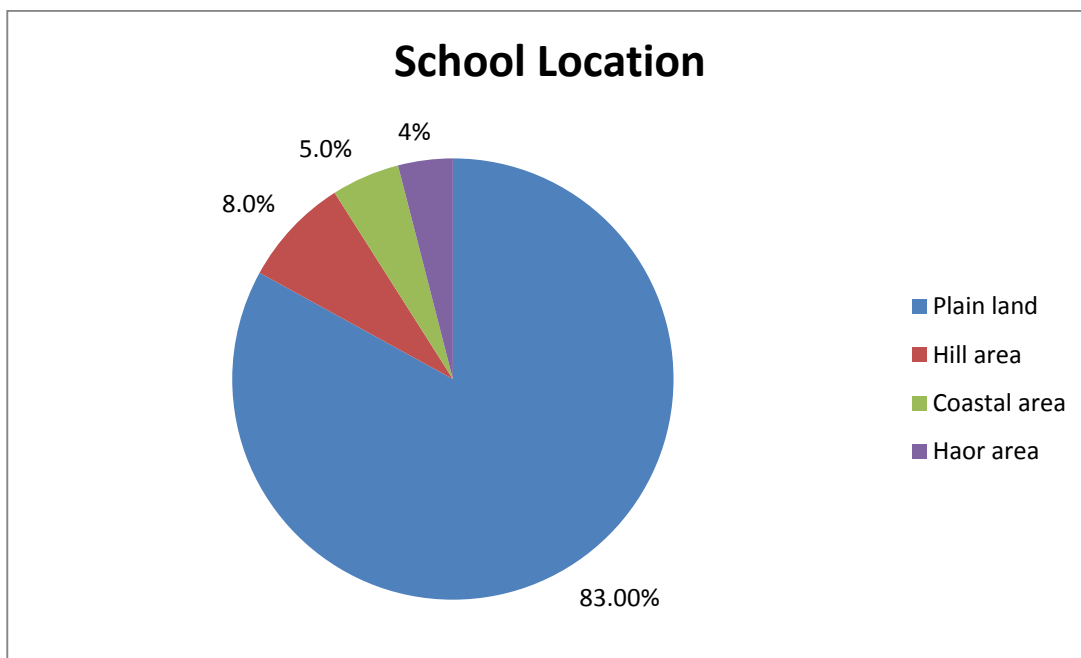


Fig.2: Area wise school location

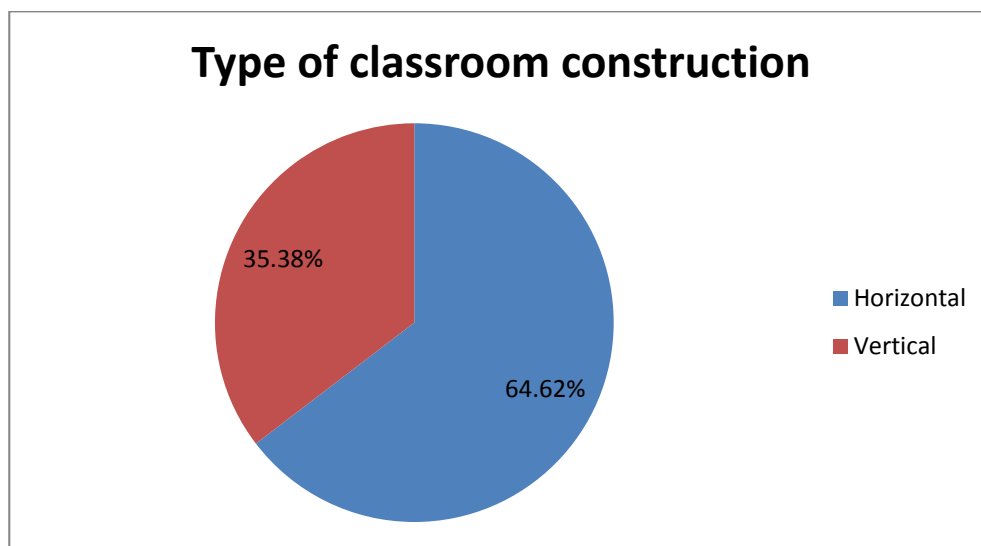
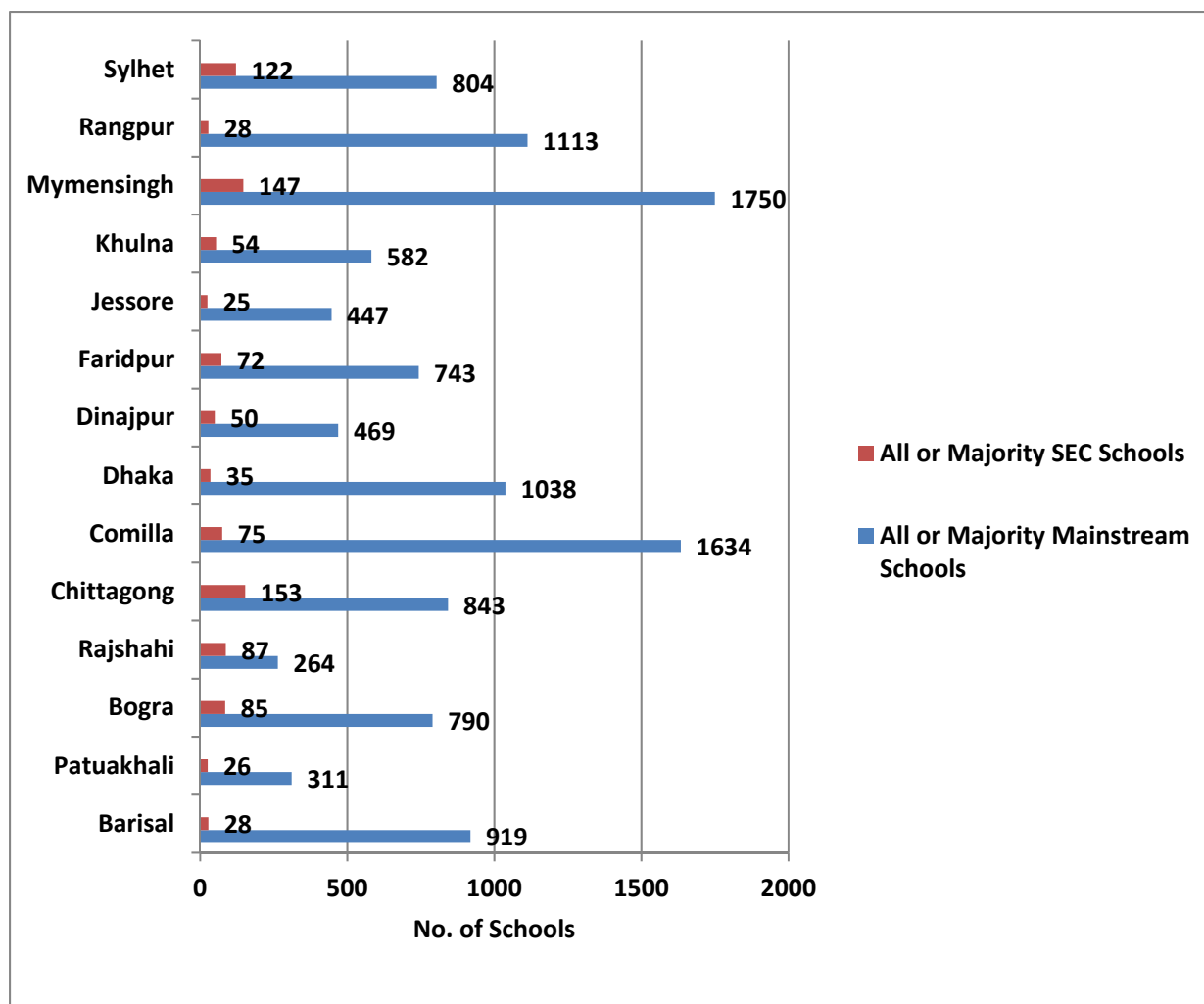


Fig.3 Type of classroom construction

A bar chart of schools on the basis of community population (in school catchment) is shown in Fig.2.



**Figure 4: Bar Chart of cumulative nos. of schools on the basis of student type**



**Fig 5. East Kodalia GPS, Kaptai, Rangamati**



**Fig 6. Mirichara GPS,Kaptai, Rangamati**





**Fig 7. Afaz Uddin GPS,Kutubdia, Cox's Bazar.**



**Fig 8. Parimal Chandra Talukder GPS, Kaptai Rangamati**

## 6. Social Safeguard Management during the Period

### Social Safeguard Screening of Schools

MoPME had given approval for construction of new classrooms for 422 nos. dilapidated schools on February 19, 2017. Omitting the schools which cannot be constructed due to various reasons up to date 299 new schools been taken up for construction. The social safeguard screenings of the schools have been performed through social safeguard screening format (Annex A). After screening it was found that 46 schools are located in Small Ethnic Community areas. The region wise status is shown in Table 3 below:

**Table 3: Status of Social Safeguard Screening of Schools**

Region	Total schools	Distribution of school on the basis of SEC	
		All or Majority Mainstream population	Majority Small Ethnic Community population
Barisal	25	24	1
Patuakhali	21	19	2
Bogra	15	13	2
Rajshahi	8	6	2
Chittagong	10	8	2
Comilla	44	42	2
Dhaka	27	26	1
Dinajpur	21	19	2
Faridpur	32	29	3
Jessore	20	19	1
Khulna	30	28	2
Mymensingh	11	10	1
Rangpur	19	19	0
Sylhet	16	13	3
<b>Total</b>	<b>299</b>	<b>275</b>	<b>24</b>

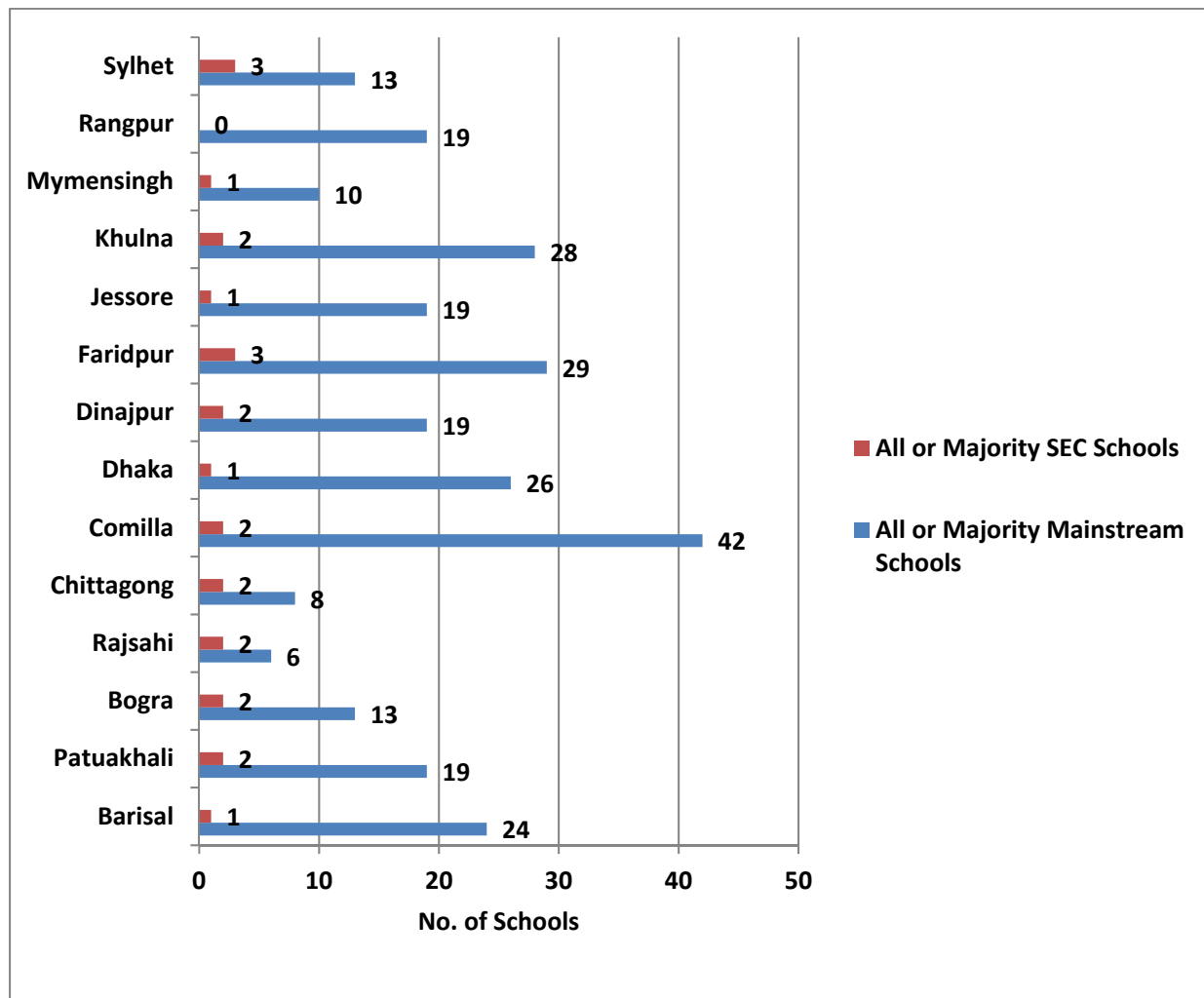
A bar chart of schools on the basis of community population in school catchment is shown in Fig.2

### Safeguard measures considered by PEDP-3

No major harmful impacts on the environment from civil construction under the program is envisaged. In the case of Chittagong Hill Tracts, given the remote and inaccessible locations of many areas where carrying costs of construction materials could be comparatively high, there the priority has been given on the use of locally available construction materials (e.g. Bamboo and wood). Another, particularly important point in this regard is the preservation of the surrounding ecosystems around the school building which means there should not be any hill cutting and destruction of ecosystem for civil works. Planting of exotic/alien invasive species (e.g. teak) of trees is avoided rather indigenous tree species will be planted to conserve the native biodiversity and maintain ecosystem integrity. Special school types were designed for the areas and presented to



the local people's representatives in view exchange meetings. The type of school was selected with their agreement.



**Figure 7: Bar Chart of schools on basis of community population**

The screening format which has been received from the field, we observed that there is no case of land acquisition required for the construction of schools, therefore there is no case of resettlement or migration of people is reported. Finally it can be concluded that the Involuntary Resettlement (IR) issue is not a issue of concern.

## 7. Safeguard measures considered by PEDP-3

PEDP-3 considered the application of safeguard requirement in the plains districts and Chittagong Hill Tracts depending on (i) the presence and prevalence of SECs in close vicinities of the schools that are undertaken for expansion as well as location and sites of the new schools; and (ii) whether or not the required physical works would affect them in manners to threaten their cultural way of life and restrict access to their livelihood activities. Given their scope for individual schools and availability of khas land in CHT, it is assumed that the civil works are highly unlikely to cause impacts that would threaten SECs in any significant manner. Followings are the safeguard measures considered in PEDP3:

### **Hill friendly school design**

JARM, 2013 had decided that that hill friendly school buildings will be designed for Chittagong Hill Tracts. LGED initially developed the design of three types of hill-friendly school buildings. In the design for remote areas priority was given to the use of locally available construction materials (e.g. Bamboo, wood and CI sheet) since carrying costs of construction materials could be comparatively high. For the preservation of the surrounding ecosystems around the school building there shall not be any hill cutting and destruction of ecosystem for civil works. LGED arranged three participatory meetings in three Hill Districts to finalise hill friendly design of school building.

In the meetings the participants recommended for building which is made mainly of locally available materials. The logic behind suggesting the type is the easily availability of local materials in remote and inaccessible areas. The type shown in Fig. 4 is being constructed now for hilly areas.

### **Grievance Redress Mechanism**

DPE will establish a procedure to answer queries related to PEDP 3 and schools undertaken for improvements and new construction; address complaints and grievances about any irregularities in application of the SMF guidelines for impact assessment and mitigation; and other personal/community concerns. Land-related complaints may range from disputes over ownership and inheritance of the acquired lands to affected non-land assets; donations under threats; etc. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly saving the complainants resorting to expensive, time-consuming legal actions.

A Grievance Redress Committee (GRC) will be constituted by DPE at the Upazila level, with memberships to ensure impartial hearings and transparent decisions. Membership of GRCs in Chittagong Hill Tracts upazilas and others heavily populated by SECs will take into account any traditional conflict resolutions arrangements that are in practice.

### **Schools built on new land**

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

- For schools that will require additional lands for expansion and construction of new building, DPE will undertake community/stakeholder consultations prior to their inclusion in the works program. In addition to those for mobilizing community support for children's education, the other important objective of these consultations would be to determine (i) if the communities and/or well-to-do individuals / families can make the required lands available on donation; (ii) whether the lands could be purchased directly on "willing buyer-seller" basis; or (iii) whether the lands will have to be obtained through legal acquisition.
- Consultation topics would include, among other issues, the (i) objectives of PEDP 3 and the AF as a whole and those of physical works required for the schools; (ii) social safeguard implications of using private and public lands; (iii) identification of individuals/families who could be convinced by DPE and community for land donation;(iv) availability of public lands in the area which could be used for new schools; and (v) any other issues that would help to avoid acquisition and yet would somehow make the land available.
- To the extent feasible, DPE will try to (i) avoid subprojects that will require private land acquisition; (ii) carry out the extension/renovation works in the lands already owned by schools; (iii) use their own or other public lands for building new schools.
- Where adverse impacts could not be avoided completely, DPE will screen all subprojects to identify the potential safeguards issues and impacts by using a specified instrument (Annex A) and, if required, will prepare and implement impact mitigation plans as per the guidelines provided in the SMF.

### **Indigenous Peoples Safeguard**

The IP safeguard policies of World Bank and ADB is to design and implement projects in a way that fosters full respect for Indigenous Peoples' identity, dignity, human rights livelihood systems, and cultural uniqueness as defined by the Indigenous Peoples themselves so that they (i) receive culturally appropriate social and economic benefits, (ii) do not suffer adverse impacts as a result of projects, and (iii) can participate actively in projects that affect them.

Keeping consistency with the above safeguard requirements, the main objectives are to ensure that the program activities in general, and the physical works in particular, do not adversely affect Small Ethnic Communities, and that they receive culturally compatible social and economic benefits. This required DPE to carefully select and screen all schools and their locations and sites,

that are to be expanded or built anew, and determine presence of Small Ethnic Communities in the school localities and ensured their participation in the civil works selection and implementation processes. Depending on prevalence of Small Ethnic Communities and their needs and concerns – which was assessed through consultations-DPE worked with the following guidelines:

- Planned and designed civil works for existing schools and selected location and sites of new schools to avoid or minimize, to the extent feasible, adverse impacts on indigenous peoples.
- Where adverse impacts on indigenous people are unavoidable, adopted and implemented socially and culturally appropriate measures to mitigate them.
- To the extent feasible, DPE will try to avoid subprojects that will require private land acquisition in IP locality;
- Where adverse impacts could not be avoided completely, DPE screened all subprojects to identify the potential safeguards issues and impacts by using a specified instrument (Annex A) and, if required, prepared and implemented impact mitigation plans as per the guidelines provided in the SMF.

## **8. Conclusion**

So far about 26774 (horizontal) classrooms have been constructed under PEDP-3. All the classrooms have been constructed within the existing school premises without any land acquisition, therefore no issue of resettlement has been arisen. The accessibility to schools in localities where Indigenous People live is an issue. Considering the socio-cultural specificity and geographical distinctness in the Chittagong Hill Tracts, LGED has prepared a design of tin shed which is cultural friendly and using materials which are easy to transport. About 72 nos. of such schools have been constructed. The locations have been selected after participatory discussion.

It is thus seen that social safeguard issues have been properly taken care of in implementing the PEDP-3.

## **APPENDICES**

**Annex A****SOCIAL SAFEGUARD SCREENING**

*[The information sought in this form should be verified and recorded during school/site visits and/or community/stakeholder consultations. A DPE staff will fill in the form in presence of community members, local government officials, civil society representatives and others who have interests in the school.]*

<b>A. GENERAL INFORMATION</b>	
Name of School:	
<input type="checkbox"/> Existing School <input type="checkbox"/> New School	
Union:	Ward Name & No.:
Upazila:	District:
<b>Screening Date:</b>	
<b>Names of Persons Participated in Screening:</b>	
DPE Staff:	
Local Government Representatives:	
Community Members:	
<b>B. SOCIAL SAFEGUARD INFORMATION</b>	
<i>The Scheme is located in an area (UP, or Ward or part of a Ward) where residents are:</i>	
<input type="checkbox"/> All mainstream or non-indigenous/tribal peoples <input type="checkbox"/> All indigenous/tribal peoples <input type="checkbox"/> Majority mainstream or non-indigenous/tribal peoples <input type="checkbox"/> Majority indigenous/tribal peoples	
<b>Scope of Work:</b> <input type="checkbox"/> Improvements on Existing School <input type="checkbox"/> Construction of New School	
<b>Existing Schools:</b>	
<b>Toilets</b>	Number: Total           Land Area (decimal/square feet):
Required Land Belongs to:	<input type="checkbox"/> School <input type="checkbox"/> Private Owners <input type="checkbox"/> Others (Name):
<b>Additional Class Room</b>	Number:           Total Land Area (dec/sft):
Required Land Belongs to:	<input type="checkbox"/> School <input type="checkbox"/> Private Owners <input type="checkbox"/> Others (Name):

<b>Dormitory (CHT):</b>	Capacity (# of students):	Total land Area (decimals):	
<i>Required Land is</i>	<input type="checkbox"/> School Property <input type="checkbox"/> Khas <input type="checkbox"/> Under Customary Use <input type="checkbox"/> Under Lease to Indigenous Persons <input type="checkbox"/> Under Lease to Non-Indigenous Persons		
Other Civil Works, if any (Describe):			
<i>If Require Lands are Private, they are Presently Used for</i>	<input type="checkbox"/> Agriculture	No. of Landowners/users:	
	<input type="checkbox"/> Residential Purposes	No. of household living on them:	
	<input type="checkbox"/> Business Purposes	No. of persons using the lands:	
	<input type="checkbox"/> Other Purposes	No. of persons using the lands:	
	Name Purpose:		
<i>If Require Lands are Public, they are Presently Used for</i>	<input type="checkbox"/> Agriculture	No. of persons using the lands:	
	<input type="checkbox"/> Residential Purposes	No. of households using the lands:	
	<input type="checkbox"/> Business Purposes	No. of persons using the lands:	
	<input type="checkbox"/> Other Purposes	No. of persons using the lands:	
Name Purpose:			
<b>New Schools:</b>	<input type="checkbox"/> Without Cyclone Shelter & Dormitory		Total Land Area (decimals):
	<input type="checkbox"/> With Cyclone Shelter		Total Land Area (decimals):
	<input type="checkbox"/> With Dormitory		Total Land Area (decimals):
<i>Required Land Belongs to:</i>	<input type="checkbox"/> School <input type="checkbox"/> Land Ministry (Khas)	<input type="checkbox"/> Private Owners	<input type="checkbox"/> Land Ministry (Khas)
	<input type="checkbox"/> Other Ministries (Name):		
	<input type="checkbox"/> Other Entities (Name):		
<i>If Require Lands are Private, they are Presently Used for</i>	<input type="checkbox"/> Agriculture		No. of Landowners/users:
	<input type="checkbox"/> Residential Purposes		No. of household living on them:
	<input type="checkbox"/> Commercial Purposes		No. of persons using the lands:
	<input type="checkbox"/> Other Purposes		No. of persons using the lands:
	Name Purpose:		
<i>If Require Lands are Public, they</i>	<input type="checkbox"/> Agriculture		No. of persons using the lands:



<i>are Presently Used for</i>	<input type="checkbox"/> Residential Purposes	No. of households using the lands:
	<input type="checkbox"/> Commercial Purposes	No. of persons using the lands:
	<input type="checkbox"/> Other Purposes	No. of persons using the lands:
	Name Purpose:	
<i>If private lands are required, they will be obtained through</i>		
<input type="checkbox"/> Voluntary Donation	Agreed by Landowners: <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Direct Purchase	Agreed by Landowners: <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Other means (Describe):		
<i>Remarks, if any, about land availability:</i>		
<p align="center"><b>C. ADDITIONAL INFORMATION ON SMALL ETHNIC COMMUNITIES(SECs)</b>  <b>(IN ADDITION TO THE INFORMATION SOUGHT UNDER SECTION B)</b></p>		
<i>Names of SEC community members and organizations which participated in Social Screening:</i>		
<i>The would-be affected SECs have the following forms of rights to the required lands:</i>		
<input type="checkbox"/> Legal ownership	Number of SEC persons/households:	
<input type="checkbox"/> Customary Rights	Number of SEC persons/households:	
<input type="checkbox"/> Lease agreements with the Government	Number of SEC persons/households:	
<input type="checkbox"/> Others form of Right	Number of SEC persons/households:	
Describe Right:		
<i>The following are the three main economic activities of the would-be affected SEC households:</i> (a) (b) (c) .		

*The following are the social concerns expressed by SECcommunity and organizations:*

*The SEC community and organizations perceive the social outcomes of the scheme:*

☐ Positive ☐ Negative ☐ Neither Positive nor Negative

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

☐ Yes

☐ No

***Prepared by (Name and Designation):***

.....

(A DPE staff should fill in this form)

***Signature:*** ..... ***Date:*** .....