

123394 REV

QUALITY LEARNING FOR ALLPROGRAM (QLEAP)

Government of the People's Republic of Bangladesh

PROGRAM FOR RESULTS

Environmental and Social System Assessment (ESSA)

MARCH 2018

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
DPE	- Directorate of Primary 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
PEDP	- Primary Education Development Program
WB	- World Bank
WHO	- World Health Organization
WSS	- Water Supply and Sanitation

Bangla Term

Upazila/Thana	- Sub-district administrative area
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TABLE OF CONTENTS

SECTION I: BACKGROUND	1
1.1 INTRODUCTION AND CONTEXT	1
SECTION II: PROGRAM DESCRIPTION	3
2.1 PROGRAM DEVELOPMENT OBJECTIVES OF THE PROPOSED PROGRAM	3
SECTION III: POLICY AND REGULATORY FRAMEWORK FORENVIRONMENTAL AND SOCIAL MANAGEMENT	11
3.1 POLICY AND LEGAL FRAMEWORK	11
3.1.1 <i>Policy and Legal Framework for Environmental Safeguard</i>	11
3.1.2 <i>Policy and Legal Framework for Social Safeguard</i>	15
3.2 INSTITUTIONS FOR ENVIRONMENTAL AND SOCIAL SAFEGUARD.....	21
SECTION IV: POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS OF THE PROGRAM 23	
4.1 ENVIRONMENTAL RISKS AND OPPORTUNITIES OF THE PROGRAM	23
4.1.1 <i>Potential Environmental Risks</i>	23
4.1.2 <i>Analysis of Existing Situation and Gaps in Implementation</i>	24
4.1.3 <i>Potential Environmental Benefits and Opportunities</i>	27
4.2 SOCIAL RISKS AND OPPORTUNITIES OF THE PROGRAM.....	27
4.2.1 <i>Analysis of the Existing Situation</i>	27
4.2.3 <i>Potential Social Benefits and Opportunities</i>	30
SECTION V: OPERATIONAL PERFORMANCE ANDINSTITUTIONAL CAPACITY ASSESSMENT	33
SECTION VI: RECOMMENDED MEASURES TO STRENGTHENSYSTEMS PERFORMANCE	37
6.1 THE GRIEVANCE/COMPLAINT REDRESS MECHANISM	41
SECTION VII: REFERENCES AND BIBLIOGRAPHY	42
ANNEX I: STAKEHOLDERS CONSULTATION.....	43
ANNEX II: RESULTS FRAMEWORK	46

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

The Government's Primary Education Development Program 4 (PEDP4) 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 1-5 annually supporting approx. 13.5 million children enrolled in the MoPME/DPE pre-primary and primary education system; 1 million out-of-school children; 325,000 pre-primary and primary school teachers; and primary education teacher educators, planners, managers and policymakers. The indirect beneficiaries include over 90 million family and community members in all areas of the country. The World Bank along with other development partners (DPs) has supported the education sector in Bangladesh for over three decades. The proposed "Quality Learning for All (QLEAP) will be the continuation of this support.

The Program Development Objective (PDO) of the Program for Results (PforR) is to improve the quality of and enhance equitable access to education from pre-primary to grade 5. The PforR will support a subset of PEDP4 and will provide financing for the entire PEDP4 period, covering the whole terrain of PEDP4 result areas and activities, except for some specific exclusions. The three results areas are as follows: (1) enhancing the quality of primary education; (2) ensuring universal access and participation, and (3) strengthening management, governance and financing.

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 primary 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. A 'Harmonized EMF and SMF' developed in consultation with DPs during the implementation of PEDP3 was found to be effective by in handling environmental and social safeguards issues. The MoPME/DPE can readily utilize the same Framework for PEDP4. Meanwhile, the ESSA has identified gaps in the implementation of the EMF and other guidelines related to equitable access

of safe water supply, sanitation and hygiene facilities. ESSA recommends addressing these institutional capacity constraints and gaps in environmental and social management system. These issues 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

Environmental systems management:	
Safeguards policy framework	<ul style="list-style-type: none"> The harmonized EMF developed by MoPME/DPE for PEDP3 is adequate to address environmental safeguard issues associated with civil works as well as water supply and sanitation provision for the proposed government's program (PEDP4). Updated version of the EMF will be adopted, and implementation status will be included in DPE annual progress report. This is included in the Program Action Plan (PAP)..
Adoption of DPHE manual	<ul style="list-style-type: none"> DPHE has developed a draft manual for the maintenance of WASH blocks and tubewell facilities. This needs to be adopted by DPE and put into operation. Circulate adopted/endorsed WASH Block maintenance manual is include in the PAP.
Strengthen monitoring 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. Technical Assistance and monitoring support will be provided through Results Area 2.4 to ensure the following:</p> <ul style="list-style-type: none"> All tubewells should be screened annually (for water quality and physical status of tubewells) to ensure that appropriate interventions are taken at schools where the tubewells have been found damaged/choked up. DPHE engineers should be testing arsenic, iron and bacteriological quality in every institution's water facilities. Monitoring support to ensure that all arsenic contaminated tube well are replaced and to ensure that necessary action are taken for mitigation as per Bangladesh National Policy for Arsenic Mitigation, 2004 (replacements and/or construction related activities will be supported through the government's program). Monitoring support will be provided to ensure proper drainage system for tubewells (replacements and/or construction related activities will be supported through the government's program), Monitoring support to ensure that handwashing facilities should be available at all latrines and in proper working conditions (replacements and/or construction related activities will be supported through the government's program) <p>It should be ensured that for new installations of either tubewells or latrines, the minimum safe distance between the two should be maintained as per standard practice.</p>
Bacteriological Monitoring	<p>There is evidence from assessments that tubewells in many schools may have microbial contamination. Therefore, it is recommended that all tubewells are screened for bacteriological contamination each year. The information may be publicly disclosed in the e-</p>

	primary school system. Water quality test requirement and provision of budget to support this activity is included in PAP.
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. Development and circulation of hygiene promotion manual is a PAP action.
Update school database on tubewell information	The water quality information of tubewells are based on tests done during commissioning. But water quality parameters can change with time. Therefore, it is recommended that DPE updates the water quality and tubewell data in its e-primary school system which includes: <ul style="list-style-type: none"> - Tubewell depth information - Tubewell water quality parameters (As, Fe, Mn, bacteriological quality) including the date of testing/sampling. Parameters should state the concentration (not only presence/absence) - Working condition of the tubewell This may require adding additional fields to the e-primary school system database. This activity will be supported through RA 2.1.
Technical capacity of DPE	It has been assessed that DPE does not have sufficient technical capacity to oversee safeguard activities related to provision of safe water supply, sanitation and hygiene activities at schools. It is recommended that a consultant may be hired for this. This is included in PAP. Also, trainings need to be conducted on safeguard aspects to DPE field staff. This activity will be supported through RA 2.1.
Disaster resistance criteria in construction guidelines	Infrastructure planning guideline is revised to include disaster resistance criteria in construction guidelines. Revision of need-based infrastructure planning guideline is included as DLI 5.
Social Systems Management:	
In this Program MoPME is the legal and regulatory authority to commit resources and implement actions for social management. MoPME's experience of working with IDA and other NGOs through PEDP 2 and PEDP 3 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 MoPME. The Program can work on screening of social effects using already developed Harmonized SMF documents for PEDP 3 and refine and update it as and when needed. The Program design and relevant stakeholders including IDA have been consulted from the initiation of the Program.	
Harmonized SMF development under PEDP3 adopted and fully functional	Update and adopt the SMF of PEDP3. The safeguards arrangements as mentioned in harmonized SMF of PEDP3 is fully functional. Updated version of the SMF will be adopted, and implementation status will be included in DPE annual progress report. This is included in the PAP.
Strengthen Institutional Capacity for running the Program including monitoring of Social safeguards	The experience of PEDP3 has given MoPME enough confidence for developing institutional strength in handling nationwide primary educational program. However, inadequate and qualified staffs remain to be a problem that has been identified by MoPME and needs to be addressed effectively. Though MoPME has made adequate implementation arrangements at the macro and micro level, yet PEDP4

<p>Implementation by MoPME and by NCTB for developing books for Primary Education in Bangla and 5 other TP languages</p>	<p>needs a dedicated social safeguards implementation mechanism. While DPE with its DG as Program Director and Program Support Office (PSO) are established to coordinate and implement various responsibilities, it is imperative that some Focal Point is established to monitor social safeguard issues. As indicated in Harmonized SMF for PEDP3, it is imperative to employ dedicated Social Safeguards Experts to monitor compliances and violations at the micro level and report the same to the relevant stakeholders. MoPME should adequately resource these entities so to work effectively at the micro level and provide inputs at the macro level.</p> <p>The National Curriculum and Textbook Board (NCTB) is on course to develop study material for PPE and Class I to Class III books in Bangla and five other TP languages in 3 years time starting with 2018. Teachers' Guide has already been circulated for PPE and is being developed for circulation for Class I in 2018.</p> <p>Provision for adequate budget for the Program, including safeguards will be supported under Results Area 3.4. A Safeguard focal person/specialist is assigned at DPE to strengthen the coordination of environmental and social safeguards. This is included in PAP.</p>
<p>Coordination amongst various ministries including Social Mobilization and Integration of Local Leadership at the Micro level</p>	<p>The PEDP4 has special focus on the OOSC and Dropout cases particularly in the urban slums and the CHTs. MoPME needs to coordinate with Ministry Public administration (MoPA) and Ministry of Chittagong Hill Tract Affairs and the three Regional Councils and seek their support for mobilizing local administration and local leadership in pursuing parents to send their children to schools. At the micro level, District Parishod Chairs and Upazila Parishod Chairs, Union Parishod Chairs and members being people's representatives should be taken on board in furthering access of all children in primary education. Particular focus should be given to OOSC and dropout cases from the urban slums and CHTs where majority of the TP communities reside. MoPME/DPE should use PSO to coordinate these issues with other ministries.</p> <p>Ministry of Home Affairs (MOHA) may be asked to monitor the Child Labor issue and create consciousness amongst the people about its pitfalls, particularly in the towns/cities and amongst the TP parents. MoPME/DPE should use PSO to coordinate these issues with MOHA.</p> <p>MoPME should have special focus on the 'Boat People/Bede Somproday', floating families residing in the railway stations etc. and other Nomads; have a database on the number of affected children devoid of scope to get enrolled in PPE and primary education and plan some functional mode for their education without affecting their life and living.</p> <p>MoPME to coordinate with MoE to train adequate number of teacher at NAAND so that they could be readily employed in the primary</p>

	<p>schools to identify students with special educational needs. MoPME may approach MoE to avail the usage of Mobile Training Team from NAAND and train the teachers locally. This demands dedicated coordination by both MoPME/DPE and NAAND. Training of teachers to identify and teach identify students with special educational needs will be ensured under Results Area 2.3. In addition, necessary devices will be supplied on a need basis to Children with Special Education Need and Disability. This is included as an action in PAP.</p>
<p>Inclusiveness and Gender, inclusion of representatives from all clusters in forming different Bodies</p>	<p>There has to be inclusion of relevant stakeholders and the VG/TP representatives in the social management process particularly at the School Management Committee (SMC).</p> <p>The SMCs 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. 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.</p>
<p>Systems for information disclosure and stakeholder consultation</p>	<p>The MoPME 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. Ensuring adequate budget for development of web-based GRS will be supported under Results Area 3.4</p>

SECTION I: BACKGROUND

1.1 Introduction and Context

1. Against the backdrop of a volatile global economy, Bangladesh has had a striking economic growth over the last two decades with an average GDP growth of 6.5 per cent annually since 2010 driven by manufacturing and services. Looking ahead, growth in the near and medium-term is expected to rise modestly with projected GDP growth between 6.4% to 6.8% in 2017 and 2018. Bangladesh has joined the ranks of lower-middle-income countries with a GNI per capita of \$1,409 in 2016. The country has made significant improvements in key areas of human development, including several health and education-related Millennium Development Goals (MDG) targets. Similarly, equitable access to primary education has improved drastically: over 97% of primary-age children are enrolled in school, and gender parity in enrollment has been achieved at both primary and secondary levels.

2. However, in 2010, almost two-thirds of the 57 million workers in the domestic labor market had no education, and less than 25 percent of the workforce had secondary education or less than five years of primary education. This puts the economy at risk of falling into a low-productivity/low-wage trap. This is especially the case for poor youth, who often do not have the required education and skills needed for accessing remunerative, formal wage employment. There is thus a pressing need for the country to systematically upgrade its human capital by further enhancing the quality of and access to education. Given that knowledge and skills acquisition in later years largely depends on the foundational skills (literacy, numeracy), developed during the early grades, further investments in primary education are critical. Thus, investing in quality education is key to successfully unleashing the true potential of Bangladesh's young people and benefiting from the current demographic dividend.

3. The World Bank along with other development partners (DPs) has supported the education sector in Bangladesh for over three decades. The proposed "Quality Learning for All (QLEAP)" will be the continuation of this support. It will be a PforR operation.

a. The Scope of ESSA

4. 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.

5. Specific objectives of ESSA are as follows:

- a. To review the existing policy and legal framework of Bangladesh related to management of environmental and social impacts of the Program interventions
- b. To assess the capacity of MoE/DPE for environmental and social impact management within the Program system
- c. To assess the Program system performance with respect to the core principles of the PforR instrument and identify gaps in the Program’s performance
- d. To include assessment of monitoring and evaluation systems for environment and social issues
- e. 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

f. Approach to ESSA

6. The assessment team used various approaches to review the environment and social systems that are relevant to Primary 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, additional classroom construction, access to education by vulnerable groups) and national consultations with all key stakeholders related to primary education.

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

8. 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 include safeguards risk mitigation measures in the PAP and/or identify opportunities to improve systemic implementation, strengthen institutional capacity through the Program.

SECTION II: PROGRAM DESCRIPTION

2.1 Program Development Objectives of the Proposed Program

9. The Program Development Objective (PDO) of the PforR is to improve the quality of and enhance equitable access to education from pre-primary to grade 5.

10. The Program will be implemented over the course of five years from the financial year (FY) 2017/18 to FY 2021/22. The program is socially and geographically inclusive and caters for children irrespective of gender. It will cover all upazilas, districts and divisions of Bangladesh. It will provide educational opportunities to out-of-school children, children with special needs, populations in hard to reach areas, indigenous people, and ethnic minorities. The Program is well aligned with the National Education Policy 2010 and the 7th Five Year Plan (2016-2020). (MoPME identifies this program as PEDP4, the World Bank internally uses the name, “QLEAP”)

11. Achievement of the PDO will be measured by the following key performance indicators (KPIs):

- a. Percentage of grade 3 students achieving grade level competencies in Bangla and Mathematics [*quality*]
- b. Percentage of Government Primary Schools (GPS) that meet at least 3 of 4 school-level quality indicators [*quality*]
- c. Primary cycle completion rate [*quality/access*]
- d. Net enrollment rate (NER) difference between richest 20% and poorest 20% of households [*equitable access*]

2.2 Beneficiaries

12. The direct beneficiaries of PEDP4 are approximately 13.5 million children enrolled in the MoPME/DPE pre-primary and primary education system; 1 million out-of-school children; 325,000 pre-primary and primary school teachers; and primary education teacher educators, planners, managers and policymakers. The indirect beneficiaries include over 90 million family and community members in all areas of the country.

2.3 Program Results Area

13. **The PforR will support a subset of PEDP4, as summarized in Table 1.** Specifically, the PforR will provide financing for the entire PEDP4 period, covering the whole terrain of PEDP4 result areas and activities, except for some specific exclusions.¹

¹The DPs planning to finance PEDP4 have agreed to a common program boundary of support, which is also the Bank’s PforR boundary.

Table 1: PforR Scope

Item	Government Program	Program Supported by WB PforR
Title	PEDP4	QLEAP
Implementation Period	FY18/19–FY22/23	FY18/19–FY22/23
Geographic scope	Nationwide	Nationwide
Objective	To provide quality education to all children of Bangladesh from pre-primary up to Grade 5 through an efficient, inclusive and equitable education system.	PDO: To improve the quality of and enhance equitable access to education from pre-primary to grade 5.
Activities or outputs	<ul style="list-style-type: none"> • Covers pre-primary and grades 1–5 in government primary schools (GPS), newly nationalized GPS (NNGPS), madrasahs, learning centers and all other institutions under the purview of MoPME • Finances both development and non-development expenditures. • Program Results Areas are <i>Quality</i> (curriculum reforms; textbooks and teaching learning materials; teacher recruitment, deployment and advancement; teacher education; continuous professional development; ICT in education; assessments and examinations; assessments and examinations reforms; pre-primary education; <i>Equitable Access and Participation</i> (need based infrastructure, including water and sanitary hygiene (WASH) facilities; out of school children; special education needs; education in emergencies; communication and social mobilization); and <i>Management, Governance and Financing</i> (data systems for decision-making; institutional strengthening; school level improvement plans (SLIPs) and upazilla level improvement plans (UPEPs); strengthened budget and fiduciary system). 	<ul style="list-style-type: none"> • Coverage same as in the Government’s PEDP4 except for the following exclusions: production (printing) of textbooks; procurement of ICT equipment and accessories; procurement of motor vehicles; procurement of furniture; pensions and gratuities; purchase/acquisition of land; unadjusted advances loans; procurement of goods that require international procurement • Provision of textbooks and ICT equipment are national commitments of the government, and these activities have been managed well by GoB. Goods purchases are capital cost items and do not provide any value-added or strategic focus from the World Bank. Pensions and advances do not contribute much to the PDO.
Financial Management	Uses country system; expenditures will be pre-financed by GoB through the treasury system using both development and non-development budgets; audit will be conducted according to the mandate of the Office of the Comptroller and Auditor General (OCAG); and General Financial Rules (GFR) and Treasury Rules (TR) apply for program accounting.	Uses country system and existing financial rules; IDA disbursement will be made to the treasury; annual audits will be required.
Procurement method and approval	Uses country procurement system; PPA/PPR shall apply subject to any exceptions	Uses country system subject to any exceptions; no prior or post review required on individual contracts; annual fiduciary reviews (AFRs) to be used to check system effectiveness
Program expenditure	US\$ 18.1 billion	Tentative US\$ 17.7 billion
Financiers	GoB, World Bank, ADB, EU, JICA, DFID, GAC Canada, DFAT Australia, UNICEF, UNESCO, USAID	GoB, World Bank, ADB, EU, JICA, DFID, GAC Canada, DFAT Australia, UNICEF, UNESCO, USAID

14. **QLEAP supports activities in all three results areas of PEDP4.** The specific PEDP4 subcomponents or sub-results areas covered by QLEAP are as follows.

Result area 1: Quality

15. The objective of this results area is to improve the quality of primary education and ensure that all children acquire the basic grade level competencies stipulated in the curriculum.

16. **1.1. Curriculum:** This sub-result area aims to harmonize and strengthen the curricula for pre-primary and primary education. In order to improve the quality and relevance of the curricula, the effectiveness of the current curricula will be evaluated and the curricula will be revised taking into account, *inter alia*, the evaluation findings, learning assessment findings, learners' cognitive development stages, the relevant terminal competencies, and the need for effective horizontal integration across subjects and proper vertical linkages across grade levels. The revised curricula will be disseminated to all teachers, and will also be integrated into the Diploma in Primary Education (DPED) and continuous professional development (CPD) curricula used for training primary school teachers. The Primary Wing of the National Curriculum and Textbooks Board (NCTB) will be strengthened.

17. **1.2 Textbooks and teaching-learning materials:** The objective of this sub-result area is to ensure that all schools have good quality competency-based textbooks and teaching-learning materials that will contribute to ensuring expected learning outcomes. All PPE and primary textbooks and teaching-learning materials will be revised in line with the revised curriculum. The guidelines for developers of textbooks and PPE teaching-learning materials will be improved. As part of the teaching-learning materials, a set of age- and grade- appropriate children's books for independent reading (i.e., supplementary reading materials) will be provided to each school to help develop reading habits and improve reading skills. To help improve the quality of textbooks, the technical capacity of NCTB in writing and designing textbooks will be improved. The printing and distribution of textbooks will be gradually transferred to the Directorate of Primary Education (DPE), complemented by appropriate capacity building measures.

18. **1.3. Teacher recruitment, deployment and advancement:** This sub-result area aims to efficiently and rationally recruit and deploy teachers in adequate numbers, and provide them with motivating career development opportunities on the basis of professional standards and performance assessments. The recruitment, deployment and transfer procedures will be reviewed and improved through more efficient use of data so that recruitment and transfers can be planned and executed on a timely basis and fully in accordance with vacancies. In order to more efficiently utilize human resources, teachers will be transferred from schools with surplus teachers, and over-staffed double-shift schools will be converted to single shift where feasible, the current incentive mechanism will be reviewed and strengthened to encourage teachers, especially the newly recruited ones, to work in rural and disadvantaged areas as well as in understaffed schools. A system of professional standards appraisal for teachers, by HTs, will be developed and operationalized.

19. **1.4. Teacher education:** The objective of this sub-result area is to ensure that teachers meet basic professional standards at the beginning of their career. The curriculum of the existing DPED program will be evaluated and appropriately strengthened. The evaluation will also explore the feasibility of developing alternative modes of delivery, including the use of double shifts. Upazila Resource Centers (URCs) will be strengthened to disseminate the revised curriculum. To enhance the capacity of Primary Training Institutes (PTIs) to effectively deliver DPED, instructor vacancy rates will be reduced to 5%, double shifts will be used for training delivery,

and PTIs will receive the required materials and equipment. In total, around 75,000 teachers will go through the strengthened DPED program.

20. **1.5. Continuous professional development:** The objective of this sub-result area is to provide all teachers and teacher-educators (TE) with the opportunity to continuously engage in professional development activities and achieve the professional standards. The interventions in this area will include: (a) the development and approval of a CPD framework that enunciates professional standards, components of the CPD system, and responsibilities for designing, executing, and monitoring CPD activities; (b) the design of a curriculum for the different profiles of professionals, and capacity building for its implementation; (c) the delivery of face to face short-term training; (d) utilization of schools as the main location for teacher professional development, led by head teachers, assisted by TEs, and complemented by face to face workshops/training. While the CPD framework is being developed, and adopted, the following CPD activities for teachers and head teachers will be carried out: sub-cluster need-based training, subject-based training, induction training for newly recruited teachers, head teacher leadership training, and customized English language training. There will also be provisions for study tours, short-term overseas training and participation in Master's programs in Bangladesh and abroad. All Assistant Upazila Education Officers (AUEOs) will receive academic supervision training. CPD implementation will be decentralized to the upazila level, and training will be locally organized and monitored.

21. **1.6. ICT in education:** This sub-result area aims to increase the availability and effective use of digital materials for teacher education and professional development, and student learning. Digital resources will be developed and made available to teachers to support their continuous professional development; and to teachers and students to support teaching learning in the classroom. The availability of ICT in schools will be increased, with at least two multi-media classrooms being provided to each school. All ICT initiatives will be evaluated to generate knowledge to inform ICT policy and practice.

22. **1.7. Assessments and examinations:** The objective of this sub-result area is to establish an improved system for assessments and examinations that will correctly measure and analyze student learning, and provide evidence based recommendations for education reform. A Primary Education Board (PEB) will be established with the necessary capacity and resources to lead the design and administration of the Primary Education Completion Examination (PECE), National Student Assessment (NSA) and school-based terminal tests. The PECE will continue to be administered annually, and will be fully competency based by the end of the program period. A national student assessment of mathematics and Bangla for grades 3 and 5 will be conducted in 2021. The results of these assessments and exams will be analyzed to produce policy briefs and action plans for education reforms.

23. **1.8. Pre-primary education (PPE):** This sub-result area aims to enhance the school-readiness of five-year old children, enabling them to successfully transition to primary school. Building upon the achievements of PEDP 3, the program will introduce one year of PPE in all government primary schools, and the quality of PPE will be enhanced by improving the physical environment, enhancing teacher capacity, recruiting around 26,000 teachers, constructing sufficient classrooms to ensure that all schools have a dedicated PPE classroom, and ensuring the supply of play and pedagogical materials on a timely basis. The supervision, monitoring and evaluation of PPE will be strengthened through the capacity building of head teachers (HTs), AUEOs and Assistant District Primary Education Officers (ADPEOs).

24. **Other sub-results areas and interventions to improve quality (outside the scope of QLEAP but supported under PEDP4):** The program will ensure timely delivery of textbooks to schools each year, and will also finance the provision of ICT equipment for schools. Both are regular activities being carried out by the government under PEDP3, and the World Bank is not expected to add value in these areas.

Result area 2: Equitable access and participation

25. The objective of this component is to provide communities with learning environments that support participation of all children, and ensure continuity of education.

26. **2.1 Needs-based school infrastructure:** The objective of this sub-results area is to improve the physical quality of the learning environment in schools through the construction of additional classrooms and water and sanitary hygiene (WASH) facilities, provision of necessary furniture, and regular maintenance of the education system infrastructure. It will finance the construction of approximately 95,000 classrooms, teachers' rooms, head teacher rooms and multipurpose rooms to ensure that all schools have a student classroom ratio of 56:1 or less, and that double-shift schools are gradually converted to single-shift. Similarly, around 80,000 WASH Blocks and 15,000 safe water sources will be constructed/installed so that all schools have adequate WASH facilities, including at least one gender segregated and disability-accessible WASH block, a safe drinking water point, and group hand-washing facilities. Hygiene promotion will be integrated in the revised curricula and textbooks, as well as in the DPED and CPD curricula. The Program will support the development and adoption of tubewell and WASH block maintenance policy, including strengthening institutional capacity for environmental compliance and oversight. The revised guidelines for school level improvement plans (SLIPs) and orientations for School Management Committees (SMCs), HTs and AEUOs will also cover WASH topics.

27. **2.2. Out-of-school children (OOSC):** The objective of this sub-result area is to reduce the number of 8-14-year-old children who have either never enrolled in school or have dropped out of school by offering alternative modalities of education up to grade 5. Around one million out-of-school children will be enrolled in learning centers following the formal primary curriculum, and will be eligible to take the PECE, enabling them to continue their studies in the formal education system. There will be independent verifications of the learning centers, ensuring student and teacher attendance, and adherence to service and performance standards. The Bureau for non-Formal Education (BNFE) under MoPME will be responsible for implementing this subcomponent. DPE will provide necessary support and the list of dropouts and never-enrolled children to BNFE for identifying potential beneficiaries.

28. **2.3. Children with special education needs (SEN):** This sub-result area aims to identify children with special education needs and enable them to have primary education in mainstream primary schools. In order to create a more conducive and supportive school environment for children with SEN in mainstream schools, the curriculum and associated textbooks and teaching-learning materials will be reviewed and updated, relevant modules will be designed and integrated into the DPED curricula and in-service training program, and the capacities of instructors to deliver these modules will be improved. The focus will be on children with mild to moderate disabilities. The modules will cover, among other things, the early identification of special needs, specialized pedagogical techniques, creating an inclusive environment at school and in the classroom, and liaison with parents and specialized services. The program will also strengthen linkages between schools and specialized services for SEN.

29. **2.4. Education in emergencies (EiE):** The objective of this sub-results area is to enhance disaster resilience and ensure disaster preparedness of the primary education sector, promote a culture of safety and enable continuity of education for all children during and after emergencies. School facilities will be made safer through enforcement of building codes, and provision of kits with protective equipment/materials to all schools. Disaster management and preparedness will be enhanced through the development, dissemination and operationalization of standard operating procedures, regular disaster simulation drills, and the development of school-level disaster management plans integrated into the SLIP. There will be a provision for EiE block financing for make-shift schools. Disaster risk reduction and prevention education will be integrated during the curriculum revision and development of new textbooks and teaching-learning materials.

30. **2.5. Communications and social mobilization:** The objective of this sub-result area is to ensure that key stakeholders are empowered and informed to promote, support and advance the provision of quality primary education to all age-appropriate children. At an institutional level, institutional capacities and systems will be developed and strengthened to support advocacy, coordinate activities, and use data to plan, implement and monitor social and behavioral change interventions. At the community level, activities will engage key social networks and groups to encourage positive practices and norms. At the individual, family and caregiver level, activities will promote behavioral change to support positive education-supportive practices.

31. **Other sub-results area and interventions to improve access (outside the scope of QLEAP but supported under PEDP4):** The program will support the construction of new premises for 300 upazilla resource centers (URCs), and provide new or expanded UEO and DPEO premises for 300 upazilas and 64 districts, respectively.

Result area 3: Management, governance and financing

32. The objective of this component is to ensure strong governance, adequate and equitable financing, and good management of the primary education system.

33. **3.1. Strengthening data systems for decision-making:** The objective of this sub-results area is to improve decision-making through strengthened information systems, monitoring, reporting and evaluation. Information systems will be strengthened through the integration of databases, the elimination of information duplication, filling in data gaps, and the development of performance dashboards to inform decision making. A student registration and identification database will be rolled out to track participation and monitor student learning. Data systems will be developed to monitor and facilitate School Level Improvement Plans (SLIPs)/Upazila Primary Education Plans (UPEPs) and their associated financing. Annual School Report Cards will be provided to schools for public display to enhance transparency and accountability. The M&E Division of the DPE will be strengthened, and capacities of policy- and decision-makers at all levels will be built to better utilize data for monitoring, system performance assessment, and evidenced-based planning.

34. **3.2. Institutional strengthening:** The objective of this sub-result area is to strengthen the DPE and field education offices to manage and administer the primary education system effectively and efficiently, through a decentralized governance and management structure. DPE will be restructured and streamlined to focus on strategic guidance, coordination and oversight of divisional offices. A phased decentralization plan will be prepared taking into account relevant recommendation from the updated Organization Development and Capacity Building Guidebook (ODCBG). Administrative and financial powers will be further devolved to divisional, district and upazila education offices. Reforms to career paths, strengthening of performance appraisal systems, and capacity building of administrative staff will be undertaken. DPE will review the

recruitment rules for positions throughout the primary education system, and prepare and implement a plan to fill the vacant positions in phases based on the revised rules.

35. **3.3. Strengthening SLIPs and UPEPs:** This sub-result area aims to improve the school environment and learning outcomes through strengthened school- and upazila-based management and accountability. Improving upon the PEDP3 approach to allocating uniform SLIP funds to schools, SLIP funds will be provided to schools on the basis of a formula that accounts for school size (number of students). In order to receive funding, schools will need to meet certain accountability criteria, including the formation of a social audit committee (SAC) and the preparation and dissemination of a social audit report in the previous year. The UPEP will aim to reduce intra-upazila disparities; address school needs that cannot be covered by the SLIP; enable the execution of essential activities that can only be organized at the upazila level; and contribute to the preparation of the need-based AOP. The UPEP/SLIP guidelines will be updated and their implementation monitored.

36. **3.4. Strengthening budgets:** The objective of this sub-results area is to ensure efficient, effective and adequate budgeting of the program. GoB will aim to provide an annual budget of at least 4% of GDP to the education sector by 2022. MoF will allocate budget to PEDP 4 as per approved chart of accounts and release budgets to MoPME in four quarterly installments as per the norms of GoB. Implementation of DPE's web based accounting system will further improve the timeliness of allotment letters reaching the drawing and disbursement officers (DDOs). DPE Divisions will be empowered to take a stronger role in budget planning and execution. Certain powers of budgeting and expenditure will be further delegated to the field offices level. As and when powers are decentralized or delegated, the capacities of senior levels of management will be built to provide strategic guidance and oversee budget execution.

37. **3.5. Procurement and financial management:** This sub-results area aims to ensure maximum use of country systems and strengthen existing fiduciary arrangements. It focuses on strengthening the fiduciary (procurement and financial) system by providing adequate human resources, implementing the government's integrated budgetary accounting system (iBAS/iBAS++) and electronic government procurement (eGP), building capacity and strengthening the internal audit system. The program will ensure that qualified and adequate number of fiduciary experts are in the procurement and finance divisions of DPE, iBAS/iBAS++ is rolled out and used by district offices for FM reporting, the majority of procurements done at DPE are implemented through eGP, and necessary capacity building of fiduciary personnel at all levels takes places and that DPE adequately coordinates all procurement activities of the program including the procurement and contract management outsourced to other government agencies. Annual fiduciary reviews will be conducted to improve system efficiency.

Implementation Arrangements

38. **MoPME will be the Executing Agency** responsible for overall policy guidance, coordination and oversight. DPE of MoPME will be the main implementing agency. Headed by the Director General (DG), and supported by two Additional Directors General (ADGs), DPE will be responsible for overall implementation and coordination of the Program activities across MoPME/DPE and other implementing agencies. The two ADGs will work together to

ensure daily coordination of program implementation while the DPE line directors² under the ADGs will be responsible for the implementation of key areas of the program. The Program Division under one of the ADGs will support coordination activities and progress reporting. The M & E division will be responsible for managing M & E activities. An independent verification agency (IVA) commissioned by the MOPME will carry out the verification of the achievements of the DLIs. BNFE will be responsible for implementing SCE activities targeted towards OOSC.

² The line directors will head the following divisions at DPE: Planning and Development; Administration; Finance and Procurement; Policy and Operation; Training; Second Chance Education; Monitoring and Evaluation; Information Management; and Program Division.

SECTION III: POLICY AND REGULATORY FRAMEWORK FORENVIRONMENTAL AND SOCIAL MANAGEMENT

39. 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

40. Bangladesh has a number of policies, instruments and laws that support environmental and social management and the environmental and social assessment processes. The most important of these are the Environment Conservation Act, 1995 (ECA, 1995), and the Environment Conservation Rules (ECR, 1997). The ECA 1995 is primarily an instrument for establishing the Department of Environment (DOE), and for controlling industrial and project related pollution. The Act also defines in general terms that if any particular activity is causing damage to the ecosystem, the responsible party will have to apply corrective measures. In addition to the Environmental Conservation Act and Rules, there are a number of other policies, plans and strategies which deal with the water sector, agricultural development, coastal area, protected area disaster management and climate change. These are the National Water Policy, 1999; the Forest Act 1927 (last modified 30th April 2000); National Forest Policy, 1994; the National Conservation Strategy 1992; National Environmental Management Action Plan (NEMAP), 1995; Coastal Zone Policy, 2005; Coastal Development Strategy, 2006; National Agricultural Policy, 1999; National Fisheries Policy, 1996; National Livestock Development Policy, 2007; Standing Orders on Disaster, 1999 (revised in 2010); Bangladesh Climate Change Strategy and Action Plan, 2009; National Plan for Disaster Management, 2010-2015. Some of these policies and legislations are described in this chapter for reference. The Bangladesh National Building Code, 2006 and Bangladesh Labor Act, 2006 will also be important regarding the occupational health and safety of workers and laborers to be involved in the Project's infrastructure development.

41. 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.

3.1.1 Policy and Legal Framework for Environmental Safeguard

42. 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

43. 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

44. 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

45. 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.

46. 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

47. 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

48. 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

49. The policy calls for nationwide access to safe drinking water and sanitation services at an affordable cost. The policy sets out the basic framework for the improvement of public health quality and to ensure an improved environment, together with a set of broad sectoral action guidelines. The objective is to improve public health and produce a safer environment by reducing water-borne disease and contamination of surface water and groundwater. 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. As per the policy, provision for arsenic safe drinking water and adequate sanitation will have to be ensured for schools. The water quality needs to be monitored to ensure that the supplied water is safe for drinking. The latrines to be constructed must be hygienic (confinement of feces away from the environment), blocking the pathways for flies and other insects, proper ventilation of foul gases, proper maintenance for continual use with improved hygiene practice.

National water policy

50. 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 activities associated with this project will be governed by this policy to keep the school surrounding safe from water pollution.

Groundwater management ordinance

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

National Policy for Arsenic Mitigation 2004

52. The policy provides a guideline for mitigating the effect of arsenic on people and environment in a holistic and sustainable way. This policy also supplements the National Water Policy 1998, National Policy for Safe Water Supply and Sanitation 1998 in fulfilling the national goals of poverty alleviation, public health and food security. Policy statement includes: access to safe water for drinking and cooking shall be ensured through implementation of alternative water supply options in all arsenic affected areas. All arsenicosis cases shall be diagnosed and brought under an effective management system. Impact of arsenic on agricultural environment shall be assessed and addressed. This policy gives preference to surface water over groundwater. The policy has set the target of providing arsenic free water by 2010 in the worst affected communities.

National Sanitation Strategy 2005

53. The goal of National Sanitation Strategy 2005 was to achieve 100% sanitation coverage by 2010. The strategy aims to delineate the ways and means of achieving the national target through providing a uniform guideline for all concerned. It defines **100% sanitation** – *at the very least, the term “100% sanitation” will mean to include all of the followings:* (i) no open defecation; (ii) hygienic latrines available to all; (iii) use of hygienic latrines by all; (iv) proper maintenance of latrines for continual use, and (v) improved hygiene practice. The strategy also defines the Hygienic Latrine -A hygiene latrine would mean to include all of the following: (i) confinement of feces away from the environment; (ii) sealing of that passage between the squat hole and the pit to effectively block the pathways for flies and other insect vectors thereby breaking the cycle of disease transmission, and (iii) venting out foul gases generated in the pit through a properly positioned vent pipe to keep the latrine odor free and encourage continual use of the hygiene latrine. The key suggested strategies for sanitation improvement include: (i) creating effective demand through health education and hygiene promotion; (ii) ensuring individual and community actions; (iii) activating local government institutions to play the key role for improving sanitation coverage; (iv) facilitating adequate supply chain of ‘hygiene latrines’; (v) reaching the hardcore poor; (vi) improvement in urban sanitation; (vii) media campaign; (viii) strategies for sustainability; (ix) financing for sanitation programs; (x) monitoring and evaluation; and (xi) emergency response.

National Environment Management Action Plan (NEMAP) 1995

54. NEMAP is an environmental planning exercise initiated by the government through the MoEF following the commitments made under Agenda 21 at UNCED in Rio de Janeiro in June 1992. The key element that distinguishes the NEMAP from the NCS is the commitment to full participation of the population at large interest groups, resource users and environmental stockholders, NEMAP identified the key environmental concerns to Bangladesh and provided an action plan to halt or reduce the rate of environmental degradation, improve the natural and manmade environment, conserve habitats and biodiversity, promoting sustainable development and improving quality indicators of human life. NEMAP has prioritized 57 actions on the environmental front and the government is in the process of creating a second-order priority list for immediate implementation. NEMAP outlines an Action Plan not only for the government, but for the community, the society and suggest what each and every citizen can do to protect the environment. The management actions considered in NEMAP are all essential to the sustainable development and environmental protection of the natural and human resources of Bangladesh. For the purpose of management, implementation, acquiring dedicated funds and enabling all different agencies to initiate or implement their own programs singly or in combination of agencies, all the action have been grouped under four heads: institutional, sectoral, location specific and long-term issues. Sectoral issues are: Health and Sanitation, Forest, Biodiversity, Natural Hazards, Education and Awareness, Industry, Water, Agriculture, Energy, Fisheries, Land, Housing and Transport, etc.

Bangladesh National Building Code

55. 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

56. 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.

Others: Standing Orders on Disaster

57. The 'Standing Orders on Disaster, 2010' is a substantial improvement over the previous editions (English 1999 and Bangla 1887). New features introduced in this edition include, among others, the following: i) an outline of disaster management regulative framework, ii) an introduction of core groups for emergency response at various levels, iii) multi-agency disaster incident management system, iv) risk reduction roles and responsibilities for all committees and agencies, v) new outlines for local level plans, vi) revised storm warning signals, vii) a report on cyclone shelter design. Conceptually, this edition follows a comprehensive approach emphasizing risk reduction as well as emergency responses relating to all hazards and all sectors. Consequently, it has to be followed not only during disasters, but also at normal times. The Standing Order is designed to enhance capacity at all tiers of government administrative and social structures for coping with and recovering from disasters. The document contains guidelines for construction, management, maintenance and use of cyclone shelters. According to the guideline, geographical information system (GIS) technology will be applied at the planning stage to select the location of cyclone shelter considering habitation, communication facilities, distance from the nearest cyclone-center etc. The advice of the concerned District Committee is to be obtained before final decision. The cyclone shelters should have effective communication facilities so that in times of distress there are no unnecessary delays. For this reason, the road communication from the cyclone shelters should link to cities, main roads and neighboring village areas. Provision of emergency water, food, sanitation and shelter space for livestock during such periods should also be considered for future construction of shelters.

58. Many primary schools in disaster prone areas are also used as cyclone/flood shelters for the community. If the school will be considered as shelter, the concerned District Committee should be consulted about its location and other information.

3.1.2 Policy and Legal Framework for Social Safeguard

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

59. 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:

- 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;
- 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.

60. 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. 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.

Primary Education (Compulsory) Act, 1990

61. The Primary Education Act³ is a milestone in the education sector and the Acts of Parliament received the assent of the President on February 13' 1990. Going by the Constitutional obligations, the Act defined Obligation to primary education of different stakeholders as follows:

The Government may, by notification in the official Gazette, declare primary education obligatory in whatever area from whenever onwards.

The guardian of any child dwelling permanently in an area where primary education is obligatory shall, in the absence of justified reasons, get his child admitted for the purpose of receiving primary education in a primary education institute of the said area in the vicinity of his place of residence.

The "justified reasons" mentioned in subsection (1) shall be understood as the following reasons, namely:

- The impossibility of admitting a child in a primary education institute for illness or any other unavoidable reason.
- The non-availability of a primary education institute within 2 kilometers of the dwelling place of the child.
- The impossibility of admitting a child in a primary education institute even if applied for.
- The decision of a primary education officer that the education a child is receiving at the time being is equivalent to a primary education.
- The decision of a primary education officer that it is not desirable to enter a child in a primary education institute on account of it's being mentally retarded.

³<http://www.mopme.gov.bd/Compulsory%20Primary%20Education%20Act%201990.htm>

National Education Policy 2010

62. 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.⁴

63. 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 conscience⁵. 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 in 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.

64. 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 MoPME's PEDP4 is to provide quality education to all children of Bangladesh from pre-primary up to Grade 8 through the establishment of an efficient, inclusive and equitable education system.⁶The PEDP4 has three parts, each of which achieve a high-level outcome. Each part has intermediate and immediate outcomes, which correspond to components and sub-components. The three parts are:

- Quality: Improved quality of primary education (main indicator is quality of teaching-learning practices)
- Access and Participation: Improved participation in primary education, and

⁴Education for all and Bangladesh perspective; *MasumBillah*; Published:Wednesday, 8 June, 2016; <http://www.observerbd.com/2016/06/08/155242.php>

⁵<http://www.thedailystar.net/supplements/25th-anniversary-special-part-3/education-policy-excellent-paper-211432>

⁶ PEDP 4 Summary of Results by Component by Year, May 6' 2017; p 2

- Management, governance and financing: The management, governance and financing of primary education are strengthened

65. Focusing on Primary Education, the Policy aims to attain the following objectives:

- to develop a curricula and textbooks imbued with the national spirit with a view to cultivate the humanistic values. A congenial and joyful environment needs to be created in the schools to promote healthy physical and mental development of the children;
- to initiate a uniform and mandatory syllabus for some basic subjects to be taught in diverse types of schools delivering primary education;
- to help the students inculcate moral and spiritual values like idea of justice, sense of duty, discipline and etiquettes, non-communalism, human rights, accommodative attitudes toward corporate living, curiosity, friendliness and perseverance, and to encourage them to acquire scientific, cultural and human values and to shun superstitions;
- to ignite in them the spirit of our national liberation movement and encourage them with patriotism to dedicate themselves to nation-building;
- to make them motivated and capable of pursuing higher education through ensuring the qualitatively adequate marginal skills at respective levels of studies; To achieve this, adequate number of quality teachers will be appointed. Besides, the development of physical infrastructure, favorable social ambience, competent pedagogy, warm teachers' students relationship and the respectable status of women have to be ensured.
- to take effective steps to ensure the acquisition of essential knowledge, subject-based knowledge, life skills, attitudes, values and the sense of social awareness to meet their basic learning needs that will enable them to move ahead to the next level of education; Pre-vocational education will be in place from Classes VI to VIII to develop respect for manual labor and to give them some idea of vocational education.
- to facilitate learning in the mother languages of the indigenous peoples and small ethnic groups at the primary level of education;
- to initiate special monitoring for primary education especially in the backward areas;
- Equal opportunities have to be ensured for all kinds of disabled and underprivileged children.

66. 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 primary education. PEDP 1, PEDP 2 and PEDP 3 are worth mentioning. MoPME now has linked financing of institutions to performance, leading to the suspension of Govt. subsidies to the worst performing institutions. The composition of school 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

67. 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.⁷

Human resource development

68. 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

69. 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)

70. 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

⁷<http://www.plancomm.gov.bd/wp-content/uploads/2013/09/National-Sustainable-Development-Strategy.pdf>

health and sanitation services and nutrition for all. The core targets set in accordance with the vision and goals of the Perspective Plan under the 7th FYP include:⁸

- Human Resource Development (Education, Health and Population)
- Achieving 100 percent net enrolment rate for primary and secondary education
- Percentage of cohort reaching grade 5 to be increased to 100 from current 80 percent

71. GoB has established the following goals to develop primary education:⁹

Improve the Teaching Learning process in schools: Teacher recruitment and their career path, training, professional support and remuneration are crucial to the strategies for improving quality in education. Teachers will base assessment of learners' achievements on terminal examinations and continuous evaluation. National assessment will aim to strengthen cognitive, effective and skills domains rather than memorization. The pass rate of primary completion exam will be increased. A core curriculum will be followed in government, nongovernment, private schools and madrasas. Under this goal, the following targets have been specified:

- Mainstreaming Each Child Learn Program all over the country
- Expand in-service training to teachers
- Conduct school and classroom based assessment
- Provide quality textbooks to all children of all types of schools
- Introduce ICT in all schools including audio visual aids
- Adopt quality improvement measures in academic curriculum and pedagogy

Ensure participation and reduce disparity: Early childhood development and pre-primary education have a strong positive influence on preparedness for school and later performance and achievement of children in school. Preparing children physically and mentally to begin formal education by creating a one-year pre-primary program for children aged 5+ in all primary schools is envisaged. To address the problem of inadequate nutrition in children, the school feeding program will be expanded. Nutritional deficiency from childhood often limits the productive potential of skilled labor. As such, it is imperative to expand the school-feeding program so that nutritional issues can be addressed from an early stage. An inclusive education will enable all primary school-age children to complete quality primary education. The access portion will focus on reaching the unreached, particularly for special needs children, working children, children in difficult circumstances, and children belonging to ethnic minorities or living in remote areas. Tribal children are encouraged to learn in their native language. The following targets are set for this goal:

- Continuation of pre-primary education
- Increase support for inclusive education
- Engage all schools in social mobilization
- Provide assistance in emergency periods
- Provide health check-ups for all students and expand school feeding programme
- Construct more schools and classrooms

⁸ 7th 5-Year Plan, 18 February 2016, p xlvi

⁹ *ibid*, p 535-536

Ensure Decentralization and enhance effectiveness: Primary education management will be comprehensively decentralized. The School Management Committee will be given more authority. Involvement of Local Community will be further enhanced in the management and improvement of primary education. The following targets will help ensure decentralization and enhance effectiveness:

- Increase school funding (SLIP) with the help of local community
- Provide leadership training to head teachers
- Fill vacancies as available and recruit more teachers
- Conduct annual primary school census every year
- Continue national assessment of G-5 students

Establish Effective Planning and Management: Management of primary education will be decentralized to the extent possible with greater involvement of community and parents and greater authority for schools. To facilitate the process targets have been set:

Transparent financial management and good governance

72. Human resource development by conducting performance and need based training along and approving recruitment rules

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

73. 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).

3.2 Institutions for Environmental and Social Safeguard

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

74. 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)

75. In accordance to the participation agreement signed between DPE and DPHE, DPHE is responsible for conducting arsenic testing during operation of wells. According to the MoU, DPHE is responsible for endorsing the tubewell operation by assessing the physical need and chemical testing. Usually a DPHE Upazilla 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 Primary and Mass Education (MoPME)/Directorate of Primary Education (DPE)

76. The Ministry of Primary and Mass Education(MoPME) is the ministry responsible for primary education in Bangladesh. Its functions related to primary education are addressed by the Directorate of Primary Education (DPE).

77. The DPE, under the overall direction and guidance of the MoPME, is continuously working towards providing basic education to produce enlightened people who can contribute to the development goals of Bangladesh. In order to address the issues at the primary levels, DPE has always focused on specific actions to raising the quality of education and improving equity and access in primary education through the Primary Education Development Program (PEDP).

78. In order to address the issues related to environmental safeguards, the PEDP3 program has developed an Environmental Management Framework (EMF) which was agreed by all nine development partners. This document outlines the basic principles of environmental management during project activities associated with drinking water supply and sanitation in schools as well as civil construction.

79. MoPME has an effective tool at hand in the form of ‘Harmonized Social Management Framework’ circulated in September 2014. The framework is a revised version of the previously developed SMF for PEDP 3 and took into consideration the findings and lessons learned from the earlier ones. This updated SMF was applicable for all program activities including the PEDP 3 Additional Financing (AF). Given the effective application of the existing ‘Harmonized Social Management Framework’, it could be readily adopted for PEDP 4 and depending on specific needs, modifications be made to it as and when necessary.

SECTION IV: POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS OF THE PROGRAM

80. 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

81. The PforR operation will support minor civil works which are part of the GoB PEDP4, including construction of new classrooms, installation and/ or repair of tubewells and WASH blocks. The PforR will exclude large-scale construction, including new school buildings as well as upazila education administrative offices. No new land acquisitions will be involved and any loss or conversion of natural habitats and any changes in land or resource use are not anticipated since the construction of classrooms and WASH facilities will be within the existing school campus. New classroom construction will cause temporary inconvenience to school activities, create noise and air pollution (if construction work goes on during school working hours) and will generate construction debris. Stockpiling of construction materials may create public hazard. There is also risk of worker health and safety.

82. The results area 2.1 highlights that the PforR operation will ensure that all schools have functioning, accessible and clean WASH facilities and their students and staff practice good sanitary hygiene. The PforR operation will support maintaining the proper functioning of existing and newly installed facilities and taking remedial actions where tubewells are affected by naturally occurring contaminants (such as Arsenic). In addition, results area 2.5 under the PforR provide technical assistance and monitoring support in ensuring proper maintenance of these facilities to mitigate the risks from exposure to naturally occurring salinity and toxic elements such as Arsenic in groundwater as well as bacteriological contaminants. 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 project. 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. Again, due to improper design of WASH facilities and lack of maintenance, unhygienic environment (mosquito habitat, drainage congestion) can be created. In rural areas and most urban areas in Bangladesh, there is no provision for centralized or decentralized sewage treatment infrastructure. The sewage from the WASH blocks are confined in pits and/or septic tanks. The pits will gradually fill up if desludging operations are not carried out periodically and will render the WASH Block unusable or create environmental hazard. A licensed operator needs to be contracted by the school for desludging the pits periodically. The PforR operation will support adoption and circulation of tubewell and WASH block maintenance policy.

83. Since these are primary schools, there are no laboratories and there is no risk of generation or use of hazardous chemicals associated with it.

84. The results area 2.4 aims to enhance disaster resilience and ensure disaster preparedness of the primary education sector, promote a culture of safety and enable continuity of education for all children during and after emergencies. Due to the increased frequency and intensity of tropical cyclone, storm surge, sea level rise, flooding, river erosion, salinity intrusion and other extreme climate events, the coastal areas of the project site may be vulnerable for workers and students. Therefore pre-disaster, disaster and post disaster preparedness would be required in the project site. Proper adaptation and disaster risk reduction measure will be adopted in the emergency situation. 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. These impacts are not project-related; rather they are location and site-specific. Under the PforR operation, the school facilities will be made safer through enforcement of building codes, and provision of the minimum kit of protective equipment/materials to all schools. Revision of need-based infrastructure planning guideline is included as DLI 5.

4.1.2 Analysis of Existing Situation and Gaps in Implementation

85. In order to address the environmental related impacts as well as the occupational health and safety issues in the PEDP3 an Environmental Management Framework (EMF) was developed by MoPME/DPE. An operational manual was also developed to explain the general process of infrastructure planning, implementation, quality control and monitoring. This EMF provides general policies, guidelines, and procedures to be integrated into the implementation of all “subprojects” under the PEDP III. The purpose of this Environmental Management Framework (EMF) was to ensure that neither the infrastructure (both in terms of needs and quality) at primary schools nor the environment is compromised through the program intervention. The EMF has been found adequate in addressing the safeguard issues associated with tubewell installation and small-scale civil works in accordance with the PforR principles. A WASH block maintenance manual has also been prepared by DPHE to be circulated to all schools. The EMF developed by PEDP III, operational manual of DPE and WASH block maintenance manual encompasses all probable environmental impacts and mitigation measures related to civil construction, tubewells and WASH construction and maintenance activities. The PforR operation will support construction of tubewell/WASH block installation/ repair or maintenance. But in order to ensure these facilities are in proper working order and water quality is preserved, many of the basic design principles of the EMF and related manuals will be necessary which addresses the design aspects of these facilities. Therefore, harmonizing the EMF and adoption of the manuals for the proposed QLEAP is necessary.

86. The basic principles of EMF regarding water supply and sanitation provisions include i) regular testing of water sources for contaminants, ii) adequate sanitation facilities and establishment of a mechanism for maintenance and iii) alternate sources for drinking water where tubewells are not feasible (due to water quality or quantity issues). An environmental screening/assessment is done for all subprojects eligible for implementation. The Joint Program Director or his/her assigned official at the DPE is responsible overall for environmental compliance in PEDP III while the Program Coordinators (Superintending Engineers) of LGED and DPHE are responsible for subproject specific environmental compliance and relevant reporting in PEDP III. The Assistant Engineer at Upazila level primarily undertakes the

environmental screening of the works with the help of the Sub-Assistant Engineers. The Executive Engineer at District level verify the reports and send those to the HQ where a consultant with the help of the DPHE Engineers working at HQ prepare the compiled report. The PforR operation should adopt the basic principles of EMF and follow the institutional arrangement for program execution as stated thereof.

87. Regarding the provision of safe water supply and sanitation in schools, the safeguard requirement is installation of these facilities according to approved standards and regular monitoring and supervision. In specific regions in Bangladesh, the groundwater aquifer is arsenic contaminated and there is also possibility of fecal contamination. Therefore, water quality needs to be continuously monitored. For the purpose of annual water quality monitoring, DPE has signed a Memorandum of Understanding (MoU) with the Department of the Public Health Engineering (DPHE). DPE is providing all the tube-wells information and field test kits to the DPHE Research and Development (R&D) Division and DPHE is coordinating and implementing the testing through its field offices. DPE is paying DPHE the laboratory test cost, field test cost and reporting cost. DPHE is also responsible for construction of WASH Blocks and various sources of drinking water as per the operation manual developed by them. At the field level, as per the EMF, DPHE is conducting initial screening of existing water supply and sanitation facilities of schools and after installation of these facilities, they are conducting post-construction evaluation before handing the facilities to the schools. The environmental monitoring of newly constructed facilities have been done and the assessment is summarized in annual monitoring reports. DPE has also developed an e-primary school system which provides information on the status of school-wise facilities as well as presence of arsenic contamination in tubewells.

88. One of the main limitations of the annual monitoring is that budget is allocated for monitoring of newly installed tubewells and WASH blocks/sanitation facilities under the program and there is no blanket monitoring of these facilities and water sources for the previous PEDPs for which the defect liability periods are over. For example, the last monitoring report (July - December 2016) gives us status of installation and functioning of 1395 water points and 754 WASH blocks installed under the PEDP3 program during the period. However, the entire PEDP program has an inventory of 28,687 water points and 21,459 sanitation facilities. For the rest of the installations, no updated information is available besides the information collected during commissioning. The arsenic and iron concentration in groundwater is not constant, can change over time depending on geological conditions. Tubewells that were screened as arsenic-safe at an earlier time may become unsafe and that is why periodic monitoring is needed. Similarly, WASH blocks installed at an earlier time may deteriorate due to lack of periodic maintenance or faulty operations. A need based maintenance Plan is required for the WASH Blocks after the defect liability period. A budget provision for routine maintenance of WASH blocks and water source to be kept in favor of SMC. After installation of water sources and construction of wash blocks, the SMC has to ensure anti-theft measures to stop robbing of pump, water tap etc. for which the running water supply in Wash Block becomes interrupted. Budget provisions should be there for DPHE for periodic blanket monitoring of water quality of all installed water points.

89. The e-primary school system in DPE website only mentions whether the tubewell water is arsenic contaminated or not, but no information available regarding the arsenic concentration or when it was measured. Storing the information of arsenic concentration in the database may be useful for future monitoring plans.

90. To assess the effectiveness of the water sources and toilets installed/constructed so far, a third party independent sample testing and verification of arsenic, iron, manganese and microbial

contents as well as sanitation facilities provided both under PEDP-II and PEDP-III was undertaken in 2013. About 286 schools were sampled out of which 173 were from PEDP-II, 52 were from PEDP-III, 50 schools from the list of school which were supposed to get alternative water sources and 11 schools where tube wells were provided by other agencies were selected. Some of the key observations of the third party monitoring report highlighted several gaps in the monitoring and safeguard implementation process. It was found out that

- some tube wells, concentration of arsenic, iron, manganese, fecal coliform and chloride are more than the allowable limit both in the PEDP-II and PEDP-III tube wells. Tubewells having arsenic contamination in excess of the allowable limit has not been closed down.
- no information is available in the school about the depth of the strainer of the tube wells which is important to have an idea about the aquifer from where water is being extracted. This is also vital. Information required developing a plan for future installation of tube wells.
- About 52% of the schools reported nonfunctional tube wells (mostly from PEDPII). The primary reasons for non-functionality are: stolen pump heads, broken pump handles, damaged check valves, broken plungers, corrosion of well pipe due to high salinity, lowering of water table.
- a number of PEDP II well have been abandoned because of high salinity and/or high iron.
- A number of schools reported that the tube wells installed through PEDP II provided water for a few months after installation, but after that there was no yield in these tube wells. This generally happens when the well is not properly developed (at least for 72hrs) after installation.
- Although most of the tube wells surveyed have concrete bases and platforms, proper drainage facilities to drain out wastewater is absent in many cases (about 40% of the schools surveyed). Thus, puddles of water and muddy spoils are evident in these schools which creates hazard as these are mosquito breeding habitats.
- There is incoherence of information in the documentation regarding tubewells installed in the school and the existence of tubewell in practice (i.e. though the school is listed as one which received tubewell under PEDPII and PEDPIII, there is actually no tubewell in the school)

91. It was further observed through field visits that while the male and female WASH Blocks are supposed to be separately located considering the cultural norm of the country, it is not being properly followed sometimes due to scarcity of land. It is suggested that even if due to scarcity of land, which compels to construct male and female WASH Blocks side by side, all efforts should be made to keep the entry in the opposite direction.

92. The abovementioned information highlights some fundamental gaps in the system which involves non-adherence to basic protocols while installing and designing tubewells and its drainage provisions, incoherence of data in DPE database, lack of regular operational monitoring (both of physical tubewell structures as well as water quality). The regular operational monitoring of water quality for arsenic, iron and fecal coliform of the drinking water sources needs to be done by DPHE and the water quality database needs to be updated. DPE/DPHE needs to update the status and remove inconsistencies in tubewell database. In addition to this, given the sensitivity of the situation, it is also recommended that a third-party evaluation of the water supply and sanitation provisions should be continued throughout the Program operation period as has been done in PEDP3.

4.1.3 Potential Environmental Benefits and Opportunities

93. The PforR provides an opportunity to technical assistance and monitoring support 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

94. 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 and increasing academic performance, WASH promotion in school is a first step towards ensuring a healthy physical learning environment. 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. The results area 2.4 addresses these issues under the PforR operation.

95. 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.

4.2 Social Risks and Opportunities of the Program

4.2.1 Analysis of the Existing Situation

96. The existing situation in the country is conducive to education in general and primary education for all from the mainstream and TP/IP communities in particular. Access to at least one-year pre-primary education has also increased to 51 per cent in 2014. There is gender parity in terms of accessing primary education where at times the girls are more than boys. Over 97 per cent of primary-age children are enrolled in schools. In 2015, 19.1 million primary students were enrolled in 122,176 schools, some 77.4 per cent of which ran double shifts to accommodate the students. This resulted in fewer Students–Teacher engagement and insufficient time-on tasks.

97. MoPME's PEDP3 and PEDP3(AF) have made remarkable achievement in furthering the primary education in the country, as the program's geographic scope was nationwide. However, there is still a gap in providing educational opportunities to the OOSC, though it has recently initiated a Second Chance Education intervention, which involves service delivery by NGOs, targeting 100,000 children. The largest initiative targeting OOSC is the World Bank-financed Second Reaching Out-of-School Children (ROSC 2) Project that caters for over 200,000 children enrolled in ROSC-supported community learning centers. From 2018, PEDP 4 plans to bring under the umbrella of primary education some 1/5th of the OOSC, i.e. one million children aged between 6-14 years in a planned manner.

98. 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. MoPME's PEDP4 is a step forward towards attaining SDG 4¹⁰ and this adds to the opportunities to the Bank's program.

4.2.2 Potential Challenges and Social Risks

99. During 2015 the enrollment rate in the primary education was assessed to be over 97 per cent. As such, some 3 per cent of the out-of-school children (OOSC), amounting 5.5 million need to be brought under the umbrella of primary education. Among children aged 6-10 years alone, 2.9 million children have either dropped out or have never attended school. The prevalence of OOSC is particularly high in urban slums and the Chittagong Hill Tracts, and among children with special needs (such as those with physical and other disabilities). MoPME, under PEDP 4, is planning for One million OOSC to return to formal education where children with special education needs are planned to receive primary education at mainstream schools¹¹ in addition to the conduct of mainstream primary education. This is a huge task and would be a challenge given the fact that most or all of the OOSCs are from the poorer class residing in urban/semi urban areas and the TP inhabited CHTs.

100. There appears to be strong need for intervention focused on ensuring the acquisition of foundation literacy and numeracy skills by all students. On analysis, it is noted that the result of the poorer class across regions irrespective of mainstream population and the TP/IP has remained poor and the issue needs special attention. School related factors account for 75 per cent of the variation in student performance. This is also a challenge and would demand improving learning outcomes through more effective education policies and actions focused on school quality under MoPME's PEDP4. It is pertinent to note that PEDP4 would cover all upazilas in Bangladesh and annually benefit over 15 million students and 400,000 teachers across the country.¹²

101. Girls from the poorer class in the urban slums and TP inhabited areas are having more difficulty in accessing primary education. The issue is the same with VGs who form part of the children with disabilities of physical, mental and neurological forms.

102. A deeper study of this group of children residing in urban/semi urban slums expose the following peculiarities:

- Most come from economically insolvent and ultra poor families earning below the poverty line of US\$ 1.90 a day.
- All/ most of the guardians have migrated from the rural areas for various reasons namely, river erosion, economic insolvency, being landless, having no skill other than tilling the land and having no regular job and wages etc.
- The earning of the family head is too meager to maintain the family and meet the needs of the children including their nutrition, healthcare and education.

¹⁰The indicators to monitor the SDG4-Education 2030 agenda,

¹¹PEDP 4 Summary of Results by Component by Year (Needs Updating); May 6, 2017; p10

¹²PforR Concept note for QLEAP, January 19, 2017; p 10

- In maximum cases, both Father and Mother work at different locations and the children are left to loiter and scavenge in the neighborhood in an unhealthy environment without being enrolled in a Primary School.
- In a larger family, leaving aside the toddlers and an adolescent to care for them, almost all members of the family including the target group of students for primary education are employed in some risky jobs in the small workshops, market places, local restaurants, rickshaw and automobile repair shops and in the neighboring households.
- There are many children with disabilities of different forms among the slum children who are devoid of proper healthcare and access to primary education and are left in the slums unattended/attended by some minor when parents are away.
- Sending children to the primary schools in turn reduces family earning putting the family at higher financial risks. As such, sending children to the schools for pursuing primary education is not a priority for the parents.
- These children, having been exposed to an uncontrolled environment, are often not willing to remain tied with a regimented schooling as it takes away their habitual liberty.
- From amongst the working children, boys in the higher age group are more than the girls. Girls are engaged in household jobs and for looking after the younger siblings. Boys mostly work in workshops, restaurants and alike.
- Given the appalling economic state of the slum dwellers, parents/guardians will not be forthcoming to their children's primary schooling if the financial compensation in the form of free education including free supply of educational material, and a square meal within the school hours are provided and that is equal or close to their earning before joining the school.
- These OOSCs from the urban slums can mostly be admitted to GPSs. A very small number can be pushed to the NNPS as these are been nationalized recently and may not have adequate classroom and allied facilities to accept OOSC from the catchment area.

103. The issues with the OOSC from the TP communities in the CHTs are little different than the OOSC from the urban slums. The following are some of the reasons contributing to OOSC.

- Most come from economically insolvent and ultra poor families though there are children from the lower middle class too. Many among the parents are illiterate and farming/selling wood and bamboo is the primary occupation of this group of parents.
- TPs live in pure ethnic communities (other than townships/Upazila where there is a mix) in the rural areas close to their farmlands. The children support the parents in the farmlands.
- The difficult hilly terrain, ravines, limited communication facility including transportation facilities etc. are barriers to attending schools. At places, children have to walk miles to reach the primary school. The effect of weather has tolling effect in attending schools.

The monsoon and winter seasons are severe in the CHTs and affect children in regularly attending the schools.

- There are some children with disabilities of different forms among the TP communities who fail to attend primary schools owing to limited/no way to redress the disability.

104. While the program targets the urban slums and CHTs for the enrollment of OOSC and dropout cases, a tangible number of children of the ‘Boat People/ Bede Somproday’ who for half of the year stay away from homestead and float on the rivers and move with parents doing petty business as ‘Snake charmers’, cannot enroll in any school and it is believed that the ‘Boat People’s children need not go to school.¹³This is also applicable for the floating people (economic migrants) who migrate from the rural areas to the cities/towns and live in railway stations and other make shift places temporarily while looking for jobs.

105. Another recent challenge that the program may face is the 2017 influx of Rohingya refugees from Myanmar to Bangladesh. The current crisis started in August, 2017 after the submission of Anan Commission Report and as part of military response to militant attack on Myanmar Army Camps. Rohingyas have taken shelter in nine camps in Cox’s Bazar district (the number varies according to different sources like the Bangladesh Army, NGOs and other organizations, since some of these camps have sub-sections e.g. Kutupalong, Balukhali, and Ghumdhum). Bangladesh Army now manages all the camps on behalf of the government. However, because of the continuous influx of Rohingya Refugees, collecting authentic data about their number have become difficult. The number of Rohingyas according to Bangladesh Army have been projected to be 700,000-1,000,000 to date. This sudden influx of the refugees in one district will adversely affect the access to services for the host population. However, the government considers the Rohingya issue as a temporary and short term problem and is not willing to include them in mainstream education program.

4.2.3 Potential Social Benefits and Opportunities

Potential Social Benefits

106. Potential social benefits of the QLEAP are enormous. Access to and completion of primary education by the children of age group 6-10 would build a strong foundation to pursue secondary and higher education. As the program is socially and geographically inclusive, all the children including the OOSC from the urban slums and TP communities residing in the CHTs including dropped out children and children with various disabilities will be directly benefitted. There is also arrangement of pre-primary education for one year at the age of five in GPS/NNPS catchment areas. Introduction of study material in five languages is a big boost addressing the TP communities. Specifically, some of the important social benefits are as follows:

- Raising the access to and standard of primary education by the VG, TP throughout the country. This will effectively decrease levels of never enrolled, dropout and repetition cases.
- Arranging equal opportunity for the children with special needs to pursue primary education at the mainstream schools.

¹³www.prothom-alo.com dated 07 July 2017.

- Preparing and regimenting 5-year old children through pre-primary education for one year. The program will also cover NGO and private PPE schools too.
- Exposing children to Emergency related drills and procedures and equipping schools with minimum package of protective equipment would reduce mortality rate when calamities affect either while at the school or at the residence.
- The program for the first time caters for multi-lingual education. Supplying books at 3 levels in five languages namely Chakma, Tipra, Marma, Garo and Sadri will open new vista for the TP community to learn in their own language. Pre-primary books in these five languages were developed in 2016 and books were issues in early 2017. NCTB plans to develop study materials up to Class III in these five languages beside Bangla starting from 2018 with Class I. Side by side the TP students will be exposed to mainstream Bangla books so that after pre-primary to Class III learning in own language, TP students will be able to start Class IV in Bangla. Teacher's Guide for the purpose has already been developed. This venture fulfills constitutional obligations of GoB and honors International Mother Language Day that originated on February 21' 1952 demanding Bangla to be the state language of the erstwhile East Pakistan.
- Child labor in the society will be reduced drastically.
- One square meal at the school would help in better nutrition for the children from ultra poor society.
- Improved classrooms, more number of qualified teachers, improved water; sanitation and hygiene facilities will expose the children in a healthy and conducive school environment.
- Directly contributing to the attainment of SDG 4.

Potential Opportunities

107. The Program has the potential for many opportunities aiding universal primary education along with other issues that would positively affect the society at large. Some of the opportunities are mentioned below:

Students:

- The program ensures PPE for all children (irrespective of gender) at age 5 including from the TP community through a One-year long curriculum in Bangla and five other TP languages to prepare for primary education from age six.
- The OOSC and dropout children will have a fresh chance to enroll and pursue primary education.
- Children with special needs will have the scope to be part of the mainstream schooling while experts would be able to identify and address individual problems.
- Learning of various actions and drills during Emergency situations will help in reducing overall casualty rate as and when calamities occur.
- Child labor can be drastically reduced.

Schools:

- Screening of the WASH facilities at the schools will help to improve the physical environment.
- Capacities to practice sanitary hygiene of the Teachers and students will improve health.

- Additional classrooms will ease congestion at the schools and help in avoiding double-shifts. This will give opportunity for more Students–Teacher engagement and time-on tasks.
- Recruitment of teachers and arranging their training under DPED will improve pedagogical quality and ensure better teaching-learning.
- Filling up the vacant Head Teacher’s posts will make school administration effective. This will in turn improve overall education in the primary schools.
- SMCs, being pro-active, can monitor and ensure that the program’s new additions are being utilized for the effective primary education of the children.
- Training on emergencies and possessing minimum emergency related equipment will help in minimizing emergency-related disruptions.

Community:

- TP communities that are in dilemma about selecting their own alphabets will come forward in deciding the ‘written form of their native language’ and approach MoPME to publish books in their dialects.
- Community awareness on various actions during emergencies will be enhanced and loss of life and property would be reduced.
- The community will realize the pitfalls of ‘Child Labor’ and refrain from sending children for dangerous employments at the tender age.
- Accountability of the school authority through SMCs about quality education can be improved through community oversight.

SECTION V: OPERATIONAL PERFORMANCE AND INSTITUTIONAL CAPACITY ASSESSMENT

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 Quality education for all programs. Environmental management of provision of safe water supply and sanitation facilities will be the key issue 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, all children (boys and girls) of age 5-10 including OOSCs from the TP communities, and VGs from urban slums irrespective of geographical exclusivity will be the key focus of the Program. GoB's PEDP 4, the Bank's QLEAP and other measures would encourage the children including girls from the VG and 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 drinking water contamination (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. So the legal and policy framework for environmental safeguards is deemed adequate for the program to operate.

- An Environmental Management Framework (EMF) was developed by DPE for PEDP and was agreed by all nine-development partners. This EMF provides general policies, guidelines, and procedures to be integrated into the implementation of all “subprojects” under the PEDPIII. The purpose of this Environmental Management Framework (EMF) was to ensure that neither the infrastructure (both in terms of needs and quality) at primary schools nor the environment is compromised through the program intervention. During Additional financing the EMF was updated according to the lessons learned from the original PEDP III. The PforR operation will support minor civil works, including construction of new classrooms and tubewell/WASH block installation. In order to ensure these facilities are in proper working order and water quality is preserved, many of the basic principles of the EMF and related manuals will be necessary which addresses the design aspects of these facilities. The EMF, operational manual of DPE and WASH block maintenance manual (Draft) by DPHE adequately addresses these safeguard issues.
- Stakeholders have been consulted with regarding the risks associated with the project. ESSA report will be disclosed according to the disclosure policy of the World Bank.
- PEDP 3 has an effective grievance redress system in place. The program can bank on this GRM as the starting point and update it as and when necessary. Social Screening will be undertaken at the relevant schools to identify the TP students and their special needs in the plains where the TPs live in small number and also in the CHTs. However, as learnt through discussion at the DPE, web based GRS is yet to come by. The MoPME/DPE should take necessary measures to make the GRS functional.
- The Government Primary Schools(GPS) and *Newly Nationalized Non-Government Primary Schools (NNGPS)* would spend the Grant from MoPME¹⁴ 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.

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. The EMF has a screening mechanism for identifying impacts on natural habitats and physical cultural resources.

Core Principle 3: Public and Worker Safety

¹⁴PEDP4 Program Document Draft July 16, 2017, Chapter 5, para 5.3 Program Budget Heads

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 civil works and therefore there will 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 tubewells and sanitary facilities that can expose students and teachers to health risk. Therefore, core principle 3 will be applicable

Analysis:

- Regarding provision of safe water supply and sanitation facilities, during the operation phase of the project there is risk of exposure of chemical and bacterial contamination of suggested safeguard measures in the EMF/implementation manual are not followed properly.
- The safeguard aspects associated with public and worker safety are addressed in the infrastructure construction guidance and environmental management section of the EMF (see Annex C of the EMF). The protocols for monitoring construction sites also address these issues.

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 as the minor construction will be within the existing school premises. 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:

The program is socially and geographically inclusive and is not specific to any gender. As such the TP communities residing in any part of Bangladesh will benefit from the program. Special focus however, is given to the OOSC residing at the CHTs to ensure that they effectively join the PPE and primary education. It may be pertinent to note that in the CHTs students could learn in three of the TP languages namely Chakma, Marma, Tipra from Class I from 2018. PPE in these languages are already in operation since 2017.

Three 'Primary School Designs' using local resources that comply with the TP culture and traditions were developed by LGED and submitted to MoPME/DPE during PEDP3. However, till date no such school has been constructed in the CHTs by DPE on the account that schools constructed using local resources will not last long. MoPME/DPE may come to some concrete decision and start construction work in the CHTs. This would act as a visible incentive for TP children to join the primary education.

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 and covers all children. As such, no particular group/community is left out and there is no scope of any form of Social Conflict.

SECTION VI: RECOMMENDED MEASURES TO STRENGTHEN SYSTEMS PERFORMANCE

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.

Measures to strengthen system performance for environmental and social management

Environmental systems management:	
Safeguards policy framework	<ul style="list-style-type: none"> The harmonized EMF developed by MoPME/DPE for PEDP3 is adequate to address environmental safeguard issues associated with civil works as well as water supply and sanitation provision for the proposed government's program (PEDP4). Updated version of the EMF will be adopted, and implementation status will be included in DPE annual progress report. This is included in the Program Action Plan (PAP).
Adoption of DPHE manual	<ul style="list-style-type: none"> DPHE has developed a draft manual for the maintenance of WASH blocks and tubewell facilities. This needs to be adopted by DPE and put into operation. Circulate adopted/endorsed WASH Block maintenance manual is include in the PAP.
Strengthen monitoring 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. Technical Assistance and monitoring support will be provided through Results Area 2.4 to ensure the following:</p> <ul style="list-style-type: none"> All tubewells should be screened annually (for water quality and physical status of tubewells) to ensure that appropriate interventions are taken at schools where the tubewells have been found damaged/choked up. DPHE engineers should be testing arsenic, iron and bacteriological quality in every institution's water facilities. Monitoring support to ensure that all arsenic contaminated tube well are replaced and to ensure that necessary action are taken for mitigation as per Bangladesh National Policy for Arsenic Mitigation, 2004 (replacements and/or construction related activities will be supported through the government's program). Monitoring support will be provided to ensure proper drainage system for tubewells (replacements and/or construction related

	<p>activities will be supported through the government's program),</p> <ul style="list-style-type: none"> • Monitoring support to ensure that handwashing facilities should be available at all latrines and in proper working conditions (replacements and/or construction related activities will be supported through the government's program) <p>It should be ensured that for new installations of either tubewells or latrines, the minimum safe distance between the two should be maintained as per standard practice.</p>
Bacteriological Monitoring	<p>There is evidence from assessments that tubewells in many schools may have microbial contamination. Therefore, it is recommended that all tubewells are screened for bacteriological contamination each year. The information may be publicly disclosed in the e-primary school system. Water quality test requirement and provision of budget to support this activity is included in PAP.</p>
Hygiene promotion in all schools	<p>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. Development and circulation of hygiene promotion manual is a PAP action.</p>
Update school database on tubewell information	<p>The water quality information of tubewells are based on tests done during commissioning. But water quality parameters can change with time. Therefore, it is recommended that DPE updates the water quality and tubewell data in its e-primary school system which includes:</p> <ul style="list-style-type: none"> - Tubewell depth information - Tubewell water quality parameters (As, Fe, Mn, bacteriological quality) including the date of testing/sampling. Parameters should state the concentration (not only presence/absence) - Working condition of the tubewell <p>This may require adding additional fields to the e-primary school system database. This activity will be supported through RA 2.1.</p>
Technical capacity of DPE	<p>It has been assessed that DPE does not have sufficient technical capacity to oversee safeguard activities related to provision of safe water supply, sanitation and hygiene activities at schools. It is recommended that a consultant may be hired for this. This is included in PAP. Also, trainings need to be conducted on safeguard aspects to DPE field staff. This activity will be supported through RA 2.1.</p>
Disaster resistance criteria in construction guidelines	<p>Infrastructure planning guideline is revised to include disaster resistance criteria in construction guidelines. Revision of need-based infrastructure planning guideline is included as DLI 5.</p>
<p>Social Systems Management:</p> <p>In this Program MoPME is the legal and regulatory authority to commit resources and implement actions for social management. MoPME's experience of working with IDA and other NGOs through PEDP 2 and PEDP 3 would be a great asset in this regard. However, shortage of adequate competent</p>	

<p>staffs and ad-hoc organizational set up to implement the Program are major weaknesses within MoPME. The Program can work on screening of social effects using already developed Harmonized SMF documents for PEDP 3 and refine and update it as and when needed. The Program design and relevant stakeholders including IDA have been consulted from the initiation of the Program.</p>	
<p>Harmonized SMF development under PEDP3 adopted and fully functional</p>	<p>Update and adopt the SMF of PEDP3. The safeguards arrangements as mentioned in harmonized SMF of PEDP3 is fully functional. Updated version of the SMF will be adopted, and implementation status will be included in DPE annual progress report. This is included in the PAP.</p>
<p>Strengthen Institutional Capacity for running the Program including monitoring of Social safeguards Implementation by MoPME and by NCTB for developing books for Primary Education in Bangla and 5 other TP languages</p>	<p>The experience of PEDP3 has given MoPME enough confidence for developing institutional strength in handling nationwide primary educational program. However, inadequate and qualified staffs remain to be a problem that has been identified by MoPME and needs to be addressed effectively. Though MoPME has made adequate implementation arrangements at the macro and micro level, yet PEDP4 needs a dedicated social safeguards implementation mechanism. While DPE with its DG as Program Director and Program Support Office (PSO) are established to coordinate and implement various responsibilities, it is imperative that some Focal Point is established to monitor social safeguard issues. As indicated in Harmonized SMF for PEDP3, it is imperative to employ dedicated Social Safeguards Experts to monitor compliances and violations at the micro level and report the same to the relevant stakeholders. MoPME should adequately resource these entities so to work effectively at the micro level and provide inputs at the macro level.</p> <p>The National Curriculum and Textbook Board (NCTB) is on course to develop study material for PPE and Class I to Class III books in Bangla and five other TP languages in 3 years time starting with 2018. Teachers' Guide has already been circulated for PPE and is being developed for circulation for Class I in 2018.</p> <p>Provision for adequate budget for the Program, including safeguards will be supported under Results Area 3.4. A Safeguard focal person/specialist is assigned at DPE to strengthen the coordination of environmental and social safeguards. This is included in PAP.</p>
<p>Coordination amongst various ministries including Social Mobilization and Integration of Local Leadership at the Micro level</p>	<p>The PEDP4 has special focus on the OOSC and Dropout cases particularly in the urban slums and the CHTs. MoPME needs to coordinate with Ministry Public administration (MoPA) and Ministry of Chittagong Hill Tract Affairs and the three Regional Councils and seek their support for mobilizing local administration and local leadership in pursuing parents to send their children to schools. At the micro level, District Parishod Chairs and Upazila Parishod Chairs, Union Parishod Chairs and members being people's representatives should be taken on board in furthering access of all children in primary education.</p>

	<p>Particular focus should be given to OOSC and dropout cases from the urban slums and CHTs where majority of the TP communities reside. MoPME/DPE should use PSO to coordinate these issues with other ministries.</p> <p>Ministry of Home Affairs (MOHA) may be asked to monitor the Child Labor issue and create consciousness amongst the people about its pitfalls, particularly in the towns/cities and amongst the TP parents. MoPME/DPE should use PSO to coordinate these issues with MOHA.</p> <p>MoPME should have special focus on the ‘Boat People/Bede Somproday’, floating families residing in the railway stations etc. and other Nomads; have a database on the number of affected children devoid of scope to get enrolled in PPE and primary education and plan some functional mode for their education without affecting their life and living.</p> <p>MoPME to coordinate with MoE to train adequate number of teacher at NAAND so that they could be readily employed in the primary schools to identify students with special educational needs. MoPME may approach MoE to avail the usage of Mobile Training Team from NAAND and train the teachers locally. This demands dedicated coordination by both MoPME/DPE and NAAND. Training of teachers to identify and teach identify students with special educational needs will be ensured under Results Area 2.3. In addition, necessary devices will be supplied on a need basis to Children with Special Education Need and Disability. This is included as an action in PAP..</p>
<p>Inclusiveness and Gender, inclusion of representatives from all clusters in forming different Bodies</p>	<p>There has to be inclusion of relevant stakeholders and the VG/TP representatives in the social management process particularly at the School Management Committee (SMC).</p> <p>The SMCs 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. 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.</p>
<p>Systems for information disclosure and stakeholder consultation</p>	<p>The MoPME 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. Ensuring adequate budget for development of web-based GRS will be supported under Results Area 3.4</p>

6.1 The Grievance/Complaint Redress Mechanism

93. The GoB is committed to effective Grievance Redressing 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). MoPME developed GRM is well designed in the Harmonized SMF, September 2014 for PEDP 3 and meets the standard recommended by the World Bank and works well starting at the Upazila level- district level and finally at the DPE. In the TP held areas of CHTs, DPE would explore existing traditional conflict resolution mechanisms and include two persons from such ‘traditional conflict resolution bodies’ replacing the Headmaster of the Primary School. The UEO is responsible for keeping records of all resolved and unresolved complains and grievances for the eyes of DPE, IDA and other DPs and any entities interested in the program. At the school level, the platforms like social audits, school administration, School 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.

94. There was a plan to introduce a web portal on “Grievance Redressing System” under PEDP3 where facilities for addressing grievances online by common people would be available. All on-going and closed cases were expected to be publicly available through this portal. However, it is yet to be developed. The MoPME/DPE should make the planned GRS functional by 2018 for PEDP4.

95. 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 that 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: STAKEHOLDERS CONSULTATION

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 MoPME and different directorate levels as well as development partners, and NGOs were consulted through focused group discussion and individual level interviews. In these interviews, the government officials mentioned that the MoPME has made considerable progress in the primary education sector with regard to access to primary education including gender parity among the mainstream population and the TP communities. However, they opined that the main challenge with PEDP4 would be to bring the OOSC and Dropout students back to school and retaining them. Other issues of importance are: (1) recruitment of Head Teacher, (2) recruitment and training of teachers including at NAAND, (3) timely availability of PPE pedagogical material, (4) timely development of books in five TP languages, construction of specially designed primary schools using local material in the CHTs, and (5) bringing the children of snake charmer community, floating population and the minority communities in the plains within the fold of primary education. The issue of GRS was discussed and MoPME was approached to develop web based GRS which remained undone during PEDP3. The participants opined that since the parameters of PEDP4 are different from PEDP3, the institutional capacity of MoPME/DPE, Divisional Education Offices (8 new ones would be established during the program period),¹⁵DPEO, and UEO need to be enhanced accordingly for the effective oversight and timely implementation of the program. This includes recruiting Social Safeguards Consultants to monitor violations at the micro level and communicating the same at the macro level. MoPME/DPE took note of the other concerns and a reflection of these would be in the final Program Document of PEDP4.

The development partners emphasized on effective mechanism to bring the OOSC and dropout children to the primary schools and advised of Citizen Engagement to make the program a success. The DPs opined that the existing Harmonized SMF developed for PEDP3 could be readily used for PEDP4. They emphasized on the recruitment of Quality Head Teacher and other teachers for effective and quality pedagogy in the primary schools. They also emphasized that NCTB should maintain the timetable set for MLE during the program period.

All stakeholders agreed that GEVA has substantially improved through sustained gender parity of students in the primary education. They also noted that it has been further enhanced as female teachers make up 60.3% of all primary school teachers.¹⁶ They emphasized on Gender Equity and Action Plan needs to be implemented to ensure compliance with international best practices including World Bank policies. Adequate monetary and human resources should be made available to this end.

The list of key stakeholders is detailed in table below:

¹⁵ PEDP4 Program Document, Attachment C Implementation Guidelines; Draft, July 16, 2017; para 3.9. page 32
¹⁶In all types of schools. ASPR 2017

Persons met	Organization
1. Mr. HasibulAlam	Additional Secretary, MoPME
2. Mr. BijoyBhusan Paul	Director Training, DPE
3. Mr. Enamul Quader Khan	Director (M & E), DPE
4. Md. Golam Kibria	DFID
5. Mr. Saurav Dev Bhatta	WB
6. Md. Saber Hossain	Director Administration, DPE
7. Md. Delwar Hossain	Director (SCE), DPE
8. Fahmida Shabnam	Education Adviser and Deputy Team Leader, DFID
9. James Jennings	Senior Education Adviser, DFAT
10. Ali Md. Shahiduzzaman	Education Adviser, GAC
11. A.H.M. Mohiuddin	Senior Education Specialist, JICA
12. HiroafiNabounka	JICA
13. A K M SafayetAlam	DD, DPE
14. Rashonuddin	DD, DPE
15. Anuj Kumar Roy	DPE
16. Md. MahbuburRahman	DD, DPE
17. Md. Enamul Islam	DD Training, DPE
18. MashudaParveen	ECL resource Person, DPE
19. Sheulee Das	DPE
20. MirzaNurunNahar	DPE
21. Mr. HumayunKabir	Consultant, Design Team
22. Mr. MunabbirHossain	Senior Specialist, MLE at NCTB
23. Mr. Kamrul Islam	AD Planning, DPE
24. Professor Salma Begum	PD, National Academy for Autism and Neuro-developmental Disabilities (NAAND)
25. KhaledaAfsar	Commercial Manager, DFID
26. Mahfuza Rahman	P.O. UNESCO
27. Dr A Q M ShafiulAzam	Consultant, PSO, MoPME
28. Prof. Kafiluddin Ahmed	Consultant, NCTB
29. AbdurRoufChowdhury	Consultant, PSO, MoPME
30. Kawsar Sabina	DD (P & D), DPE
31. Mokabbir Ahmed Talukder	DD (PPE), DPE
32. SyedaNurjahan	DD, DPE
33. H M Abul Bashar	AD, DPE
34. Saiful Islam	DD, DPE
35. AHM Golam Kibria	DD, DPE
36. Muhammad SohelHasan	DPE
37. Mohammad Sumon	-
38. Shariful	-
39. Md. Nabi Hussain	DD, DPE
40. RokhsanaHyder	EO, DPE
41. Mohammad MahfuzulHaque	DPE
42. Khursheda Begum	DPE
43. Md. Baharul Islam	DD Admin, DPE
44. Md. AnowarHossain	AD (M & E), DPE
45. Md. Abdul Wahab	AD Training, DPE

46. AlamgirHossain	AE, DPHE
47. Tanjim Hasan	Consultant, PSO, MoPME
48. NilufaRahman	DPE
49. Bushra Chowdhury	DPE
50. Md. Raza Mia	DPE
51. Md. AtauaRahman	DPE
52. Md. Iftekhar Hossain Bhuiyan	DD Training, DPE
53. Md. Shafiqul Islam	AD, DPE
54. Md. Mahbub Alam	XEO, LGED
55. Peter Jensen	DFAT
56. Farah NazNowreen	DFAT
57. Mohammad Mohsin	UNICEF
58. Nadia Rashid	EU
59. AKM Salehuddin	Consultant, ADB
60. Takashi Soma	Team Leader JSP 2, JICA
61. Syed Rashed Al Zayed	WB
62. Md. Osman Gani	Programmer, IMD
63. Ashrafuzzaman	DPE
64. Tapash Kumar Sarker	DPE
65. Mr. Aminur	Consultant, ADB
66. Md. Shah Alam Sarker	EO, DPE
67. T M Asaduzzaman	WB
68. Md Anisuzzaman Bhuiyan	Consultant, WB
69. Dr. Tanvir Ahmed	Consultant, WB
70. Xin Long	ADB
71. Zhiqang Li	ADB
72. Mohammad Shahidul Islam	Education Team Leader, USAID

Annex II: Results Framework

PDO Indicators by Outcomes		DLI #	C R I	Unit of Measure	Baseline	Intermediate Targets (IT)					End Target	
						IT1	IT2	IT3	IT4	IT5		
Outcome 1: Improve quality of education	PDO Indicator 1: Percentage of grade 3 students achieving grade-level competencies in Bangla and mathematics	DLI 4		Percentage	Bangla All: 65 Boys: 62 Girls: 66 Maths All: 39 Boys: 37 Girls: 40	Bangla All: 67 Boys: 67 Girls: 67 Maths All: 41 Boys: 41 Girls: 41					Bangla All :74 Boys: 74 Girls: 74 Maths All: 45 Boys: 45 Girls: 45	Bangla All :74 Boys: 74 Girls: 74 Maths All: 45 Boys: 45 Girls: 45
	PDO Indicator 2: Percentage of GPSs that meet at least three of four school-level quality indicators			Percentage	32.8	35	40	45	50	55	55	
Outcome 2: Enhance equitable access to education	PDO Indicator 3: Primary cycle completion rate			Percentage	All: 80.9 Boys:77.7 Girls:83.9	All: 82 Boys: 80 Girls: 86	All: 84 Boys: 80 Girls:88	All: 86 Boys: 84 Girls :90	All: 88 Boys: 86 Girls: 92	All: 90 Boys: 88 Girls: 93	All: 90 Boys: 88 Girls: 93	
	PDO Indicator 4: Percentage of out-of-school children ages 8–14			Percentage	All: 11.0 Boys:13.3 Girls:8.6					All: 6 Boys: 7 Girls: 5	All: 6 Boys: 7 Girls: 5	

Intermediate Results Indicators by Results Areas		DLI #	C R I	Unit of Measure	Baseline	Intermediate Targets (IT)					End Target
						IT1	IT2	IT3	IT4	IT5	
Results Area 1: Quality	IRI 1: Percentage of double shift schools converted to single shift	DLI 5		Percentage	0	5	10	15	20	25	25
	IRI 2: Percentage of schools with approved supplementary reading materials (SRMs) in grades 1–3 classrooms			Percentage	0	0	99	99	99	99	99
	IRI 3: Percentage of schools that meet the STR standard of 40:1	DLI 2		Percentage	37	37	40	43	46	50	50
	IRI 4: Teachers recruited or trained		X	Number	11,312	15,000	25,000	35,000	45,000	50,000	50,000
	IRI 5: Percentage of PECE items which are competency based			Percentage	65	80	90	100	100	100	100
	IRI 6: PECE pass rate of OOSC enrolled in learning centers			Percentage	72	73	75	77	79	80	80
Results Area 2 Equitable access and participation	IRI 7: Total OOSC (new) enrolled in learning centers	DLI 6		Number	100,000	250,000	250,000	500,000	0	0	1,000,000 (cum)
	IRI 8: Difference in grade 5 survival rate between boys and girls			Percentage points	6.8	6.6	6.4	6.2	6.0	5.8	5.8

Intermediate Results Indicators by Results Areas	DLI #	C R I	Unit of Measure	Baseline	Intermediate Targets (IT)					End Target
					IT1	IT2	IT3	IT4	IT5	
			Percentage points	0	—	—	—	—	10	10
		X	Number	18,190,000	17,738,000	17,469,000	17,475,000	17,768,000	18,106,000	18,106,000
Results Area 3 Management, governance and financing	DLI 9		Number	0	0	0	40,000	50,000	55,000	55,000
	DLI 8		Percentage	0	30	40	50	70	80	80
			Percentage	80	90	95	98	100	100	100
	DLI 7		Percentage	0	40	60	70	75	80	80

Intermediate Results Indicators by Results Areas	DLI #	C R I	Unit of Measure	Baseline	Intermediate Targets (IT)					End Target
					IT1	IT2	IT3	IT4	IT5	
	processed through e-GP.									