

"Sustainable Enterprise Project (SEP)"

SOCIAL MANAGEMENT FRAMEWORK (SMF)

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PALLI KARMA-SAHAYAK FOUNDATION (PKSF)

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ABBREVIATIONS & ACRONYMS

CBO	Community-Based Organization
CHT	Chittagong Hill Tracts
FGD	Focus Group Discussion
GoB	Government of Bangladesh
GRM	Grievance Redress Mechanism
PO	Partner Organization of PKSF
OM	Operations Manual
OP	Operational Policies
OHS	Occupational Health and Safety
PKSF	Palli Karma-Sahayak Foundation
PMU	Project Management Unit
PO	Program Officer
RAP	Resettlement Action Plan
SEP	Sustainable Enterprise Project
SIP	Social Inclusion Plan
SMF	Social Management Framework
TP	Tribal People
TPP	Tribal Peoples Plan

SOCIAL ISSUES AND IMPLICATIONS

Introduction

Palli Karma-Sahayak Foundation (PKSF) was established by the Government of Bangladesh in 1990 as an apex development organization for poverty alleviation through employment creation. Since its inception, PKSF has been implementing various programs and projects for poverty alleviation through its Partner Organizations (POs). At present PKSF has more than 200 active Partner Organizations throughout the country.

PKSF launched its Micro -Enterprise Program in 2001 to extend financial services to the progressive clients of its partner organizations for undertaking micro-enterprises. This program termed AGROSOR is being implemented all over Bangladesh through 172 POs of PKSF. PKSF's role in microenterprise development has been strengthened through implementation of two projects with the support of IFAD namely 'Finance for Enterprise Development and Employment Creation (FEDEC)' project and 'Promoting Agricultural Commercialization and Enterprises (PACE)' project. The World Bank administered 'Community Climate Change Project (CCCP)' is one of the most successful grant management projects of PKSF.

Based on the success and lessons learned from the above-mentioned projects, PKSF is currently preparing '**Sustainable Enterprise Project (SEP)**' with the financial support from the World Bank. The project will support the business clusters only under Agri-business and Manufacturing sector from different components of the project for further develop in a sustainable way. The possible business clusters are belonging to the Agri-business and processing sectors attached with **Annex 6**.

Project Components and possible Interventions:

Project Components	Possible social safeguard interventions and impacts
COMPONENT ONE Enhancing Services Facilities and Enabling Systems	
2.1 Support for Enabling Systems (environmental health and safety Standards, and certification/standard)	OHS, Labor issues etc will be addressed; Capacity/Resilience development of the community and ME
2.2 Capacity development of ME	OHS, Labor issues etc will be addressed; Capacity development of the community and ME
2.3 Investment in Common Revenue Generating Services	Small scale construction works. No land acquisition or impacts on squatters

	Communities will be benefited.
COMPONENT TWO Support Environmentally Sustainable Micro Enterprises	
2.1 Adoption of Innovative and Environmentally Friendly Technologies/Practices	Labor and OHS will be addressed & Capacity development of the community
2.2 Strengthening of Environmentally Resilient Microenterprises	Labor and OHS will be addressed & Capacity development of the community
COMPONENT THREE Project Management, Knowledge Management and Monitoring & Evaluation	Capacity development and monitoring

Social Safeguard Issues and Their Implications

The proposed project will support microenterprises in areas that are environmentally stressed and vulnerable to climate change and natural disasters (including those prone to floods, drought, flash floods and salinity). This focus is based on the premise that there is a great need and demand for development of alternative livelihoods in those areas. The distinctive features of the project, which differentiate this project from other livelihood programs, are its interventions to build resilience and promote sustainable technologies and practices among communities in environmentally vulnerable areas, and to adopt basic operational safety norms in project-supported enterprises. To maximize the positive social and environmental impacts, the project will prioritize polluting micro-enterprise business clusters and will support expansion of economic activities that will help to achieve a cleaner environment. Variety of enterprises will be supported through this project. These measures are not only likely to vary from one vulnerable zone to another, but may as well vary within the same zone depending on the various factors of vulnerability. Major portion of the fund of this project will be used as microenterprise loan (ME loan) to the borrower under the credit line from the GoB and a minor portion of the fund will be used for the environmentally sustainable business development services to build common service facilities in selected business clusters under the grant financing from the GoB. During the project period, under the grant financing, PKSf will finance only those activities that do not include any activities which may require use of public and/or private lands obtained through involuntary acquisition and/or involuntary displacement of people. Overall project impacts are positive as there will be no major negative impacts over livelihood and income. No land acquisition will take place in this project and no squatters will be affected in this project.

However, the project may involve small up-gradation of existing market facilities, connecting road to the markets/facilities, toilet construction and small scale desalination plant establishment etc. No large scale infrastructure development is envisioned. The project will retain the option of voluntary contribution of land, and/or direct purchase collectively by the beneficiary community. The POs may also opt to purchase the lands directly, if the communities are unable Project will not do anything that impact negatively to community or HH's on their income and livelihood. No squatters will be impacted during project intervention

rather they may be benefited. Therefore, OP 4.12 will not be triggered in this project. There is also a possibility that the project will work in areas where indigenous people reside. There could also be activities from localities in the proposed working areas that are inhabited in small proportions by tribal peoples (TPs). Thus, OP 4.10 is triggered. A standalone Tribal People Framework is being prepared for this project following the guidelines of World Bank OP 4.10.

Many children traditionally work in agribusiness in rural areas, mainly after school hours. In urban and peri-urban areas there are instances of children being involved in potentially hazardous manufacturing sectors. The project aims to not only improve these hazardous conditions but will also run a community based social mobilization campaign to encourage full-time schooling for children, childhood stunting, health and nutrition and awareness regarding the dangers of potentially hazardous work. Thus project will make sure that no child labor is engaged in any sub-project where project finance is involved. Bangladesh Labor Law 2006 and Labor Rules 2015 and IFC performance standard 2 guidelines will be followed during the implementation of this project.

SMF Objectives

The principles, guidelines, and procedures provided in this SMF are intended to ensure that micro enterprise related activities implemented to achieve the following objectives:

- Enhance positive social outcomes of the enterprise activities financed under SEP;
- Ensure participation of the target communities, including women, while identifying the specific measures/activities for enterprise development;
- Prevent for loss of livelihood, which may result from land-based enterprise activities and use of common property resources; and
- Ensure compliance with the relevant GOB policies and those of the World Bank on social safeguards.
- Ensuring safe working conditions for the labors.

To achieve the objectives, Social Management Plan (SMP) will be prepared for each and every enterprise to follow the principles, guidelines and procedures outlined in this SMF and implemented before obtaining the financing. The SMP includes social inclusion plan (SIP) for all activities and tribal peoples framework (TPF) where tribal peoples are affected.

Basic Planning Principles

Screening and implementation of the activities will be based on following principles:

- While taking the decision to implement micro enterprise activities, POs will undertake extensive community consultations with regard to,
 1. Existing and emerging issues that may have been caused by proposed enterprise related activities;
 2. Identifying the impacts that could be addressed through community-based measures;

3. Assessing equity issues in the distribution of acquired benefits among different social groups, in terms of socioeconomic characteristics, gender, ethnicity and the life.
 - POs will consider activities that will significantly benefit clusters, in view of their needs and preferences expressed in consultations, especially in those separately conducted with them.
 - All activities will be subjected to screening in order to prevent execution of such activities that could result in significant negative social impacts.
 - POs will avoid to undertake land-based physical activities that may require private lands acquisition or requisition.
 - If land is required, project will try to use government land and PO's will avoid government lands where squatters are available.
 - Where use of private land is essential to implement critical enterprise related activities, POs may seek voluntary contribution (without compensation) from the concerned landowners, and/or explore alternatives to voluntary contribution that may include "contribution against compensation" where the beneficiary communities might collectively pay for the compensation.

Social Screening Guidelines

PKSF/POs will use the following guidelines for selection and implementation of activities:

Activities with Negative Social Attributes: POs will not propose to undertake activities that will create social safeguards impacts that PKSF/POs/communities cannot mitigate with their current capacity. Such activities are those that involve involuntary resettlement and adverse impacts on tribal peoples.

Involuntary Resettlement: Any physical/construction activities that

- Require acquisition of private lands by using the Bangladesh *Acquisition and Requisition of Immovable Property Ordinance, 1982 and WB OP 4.12*
- Require involuntary contribution of private lands
- Affect private homesteads
- Require lands that are not available on 'contribution against compensation' or other means not acceptable to the landowners
- Render households using public lands destitute
- Affect mosques, temples, graveyards, cremation grounds, and other places/objects that are of religious and cultural significance
- Affect people residing on government land or for commercial activities
- May significantly restrict access to common property resources and livelihood activities of groups and communities

Tribal Peoples: Any measures, including physical/construction activities that

- Threaten cultural/traditional way of life of tribal peoples

- May severely restrict access to common property resources (forests, water bodies, etc) and livelihood activities
- May affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds, etc.)
- Require private lands using the power of eminent domain under the Bangladesh *Acquisition and Requisition of Immovable Property Ordinance, 1982* and cause resettlement/relocation

GUIDELINES FOR USING PRIVATE AND PUBLIC LANDS

Project will avoid land acquisition and requisition during implementation. Individual land donation or community based land donation through compensation by community is allowed in this project. If land donation take place, PO's will submit/show legal papers to PKSf for verification and documentations, if required, at the time of field visit. If private land is required, project will make sure that there are no presences of squatters or their livelihood and income source will not be affected.

POs will implement the activities with respect to social safeguard issues and other social aspects including gender implications of the proposed activities. The POs, in consultation with the community members, will fill in the forms on measures with Negative Social Attributes (*Annex1*) and Social Safeguards Screening (*Annex 2*) and submit them with the detailed of the enterprise development. On its part, PKSf will review the information on negative social attributes in Annex 1 to determine whether or not the proposal could be financed under SEP. The information sought in the screening form Annex 2 will inform PKSf whether or not the proposed activities would involve social safeguards issues and, if they do, the nature and scale of potential impacts and how they have to be mitigated in accord with the SMF principles and guidelines. PKSf may visits the project locations and the target communities and verify whether the proposed activities are in compliance with the SMF guidelines and the screening results truly reflect the ground reality.

Public Lands: If there is presence of squatters on public land for residential /commercial purposes, project will avoid that land for project activities.

Private Land on 'Voluntary Contribution: As it is often practiced in the rural areas, the concerned members of the community, if persuaded, may elect to contribute the lands without compensation. This method will be followed only for small amount of lands and the project will ensure that,

- The contributions are voluntary;
- There are no encumbrances on the contributed lands;

- The contributions do not affect the livelihood of vulnerable persons and, if it does, the PO and community will devise and implement mitigation measures acceptable to the affected persons;
- The affected persons/contributors are made aware of the grievance redress mechanism described in the preceding section;
- The contributors give up all claims on the lands and the titles are transferred to the recipient by a local government permission/MoU/legal process and documents will be submitted/shown at the time of field visit by the PKSF's officer, if required
- The contributions are documented through an MOU (Please see annex 4)

Private Land on 'Contribution Against Compensation': Voluntary contributions are seen more feasible where the landowners are well-off and very few in number. This project will not participate in any large-scale construction. So it will not be required to follow the 'contribution against compensation' policy. However, for any unavoidable circumstances, it is required. Contributions for infrastructures like irrigation and drainage canals, roads, etc, may involve a larger number of landowners -- some of whom might be quite marginal and vulnerable. In such cases, the beneficiary communities can offer compensation on market price. *However, the landowners will have the option to refuse or to accept the 'contribution against compensation' offer without the fear of any adverse consequences.*

In cases of voluntary contribution and 'contribution against compensation', the POs will (i) ensure that landowners and communities are made fully aware of their rights and obligations; (ii) verify that contributions without and against compensation are truly voluntary; and (iii) ensure that the contributors are the legitimate owners of the lands being obtained and there are no outstanding disputes over ownership.

Impact Mitigation Objectives

The principles and guidelines provided in this framework are to avoid or minimize impacts on private landowners and public land users, mitigate the impacts that are unavoidable, and assist to improve, or at least restore, their living standards and income earning or production capacity to pre-project levels. To achieve the objectives, POs will adhere to the following strategic guidelines:

- Avoid or minimize displacement of persons/households who may have been using public lands for residential and livelihood purposes;
- Establish guidelines and procedures to ensure that private land contributions are voluntary and sought and accepted in transparent manners without causing unacceptable adverse impacts on the owners.
- Collectively decide on community-based impact mitigation measures where private lands are required for critical activities for enterprise development and adverse impacts are to be shared together by many landowners.

Guiding Principles for Land Availability

While preparing their proposals, the POs will explore alternatives to avoid or minimize use of private and public lands, especially those that have been under use by poor and vulnerable. In unavoidable cases, they will adhere to the following principles:

- Where lands are absolutely required, POs will,
 - Use as much of public lands as possible
 - Completely avoid displacement from private homesteads
 - Avoid or minimize displacement of homesteads from public lands
 - Use lands of lower value in terms of productivity and usage
 - Avoid affecting premises that are used for business/commercial activities
 - Avoid affecting religious sites like places of worship, cemeteries, and buildings/structures that are socially and historically important.
- POs will not propose any physical activities which will significantly restrict access of the communities, especially the socio-economically vulnerable groups, to common property resources that have been a primary source of their livelihood.

Impact Mitigation Principles

Where physical activities affect persons/households on public land, or require private land on “contributions against compensation”, POs will adhere to the following principles to avoid/minimize adverse impacts and adopt appropriate mitigation measures:

- As the first step toward mitigating adverse impacts, POs will always try to avoid adversely affecting persons/households who are socioeconomically vulnerable.
- Where adverse impacts are absolutely unavoidable, the POs will ensure that the beneficiary communities collectively rehabilitate the affected persons / households with measures acceptable to them.
- PO’s must conduct full consultation with the affected person.
- Where displacement of public land users is unavoidable, POs will assist the affected persons/households to relocate on available public lands in the vicinity.
- POs will mobilize the communities to collectively provide financial and material assistance to the affected persons/households to move and rebuild their houses.
- Where businesses, such as small-scale road-side shops, are displaced, POs will mobilize community assistance to relocate them in the vicinity to ensure that they remain operational and do not lose income.
- Where private land is unavailable on voluntary contribution, contribution can only be sought against compensation.

Compensation/Assistance Principles

Depending on an affected person's preference, POs and the beneficiary communities may consider using both financial and material forms of compensation and assistance. POs will ensure delivery of the agreed compensation/assistance in a timely and transparent manner. Compensation for the affected assets will be according to the following principles:

- Replacement cost for an equal amount of land of same productive quality.
- Replacement cost of houses/structures at the current prices of same building materials, plus the current cost of labor to build them. Depreciation and value of the salvageable building materials will not be deducted while computing the compensation.
- Current market prices of trees that are to be felled (owners will retain ownership of un-felled trees).
- Other acceptable in-kind compensation.
- Compensation in cash will be made in public.

The POs, beneficiary communities and the landowners will jointly determine the replacement costs of land based on the most recent transactions made in the same or adjacent localities, in view of the land type, productive quality and accessibility. Current prices of other assets, such as building materials, trees, etc, will be in accord with those in the local markets.

POs will document the impacts on affected persons/households, mitigation measures agreed with them, and verifiable evidence that the agreed measures have been implemented. The cases of voluntary private land contributions and contributions against compensation will also be documented with appropriate evidence and will remain open to verification by PKSF, World Bank (Documentation formats for impact assessment and mitigation; contribution of lands and other assets; and a schedule of compensation for using public and private lands are suggested in **Annex 3, 4 and 5**).

Community Consultation

Consultations will be inclusive of all stakeholders and used as a two- way communication strategy to provide information about the project and solicit support and agreements on the mitigations proposed.

Community consultation will be a vital part of decision making about all land-based activities. In addition to general consultation about the benefits and feasibility of specific physical activity, POs will make certain that the users of the required lands (with and without legal rights), are consulted very early in the proposal preparation process. Consultations will focus on the issue of land availability and the conditions under which they could be used for projects. In cases where the would-be affected persons are women, POs will arrange culturally appropriate or separate consultations.

POs will prepare consultations minutes indicating dates, venues, compensation issues discussed, and the details of the agreements reached. The affected persons will be provided with copies of the minutes signed by the affected persons and the POs. Copies of all such signed minutes will be kept by POs and will be made available for review by PKSF and the World Bank.

Documentation

The POs will keep the minutes of community meetings; records of persons / households who may have been displaced from public lands; voluntary contribution and “contribution against compensation” of private lands; and agreements made on compensation and the evidence of compensation payment. POs will make them available for review as and when asked for by PKSF and the World Bank.

GUIDELINES FOR TRIBAL PEOPLES PLAN

Although the Chittagong Hill Tracts (CHT), which has the largest concentration of the country’s tribal population, is not covered by SEP, tribal people are spread out in almost all of the plains districts, most notably in those in the north-west, north-eastern and the coastal regions of Cox’s Bazaar and greater Barisal. The Guidelines for Tribal Peoples Plan (TPP) will apply where POs propose enterprise activities in areas/localities inhabited by Tribal Peoples (TPs). A separate Tribal People Framework is prepared for this project following the guidelines of OP 4.10.

GUIDANCE NOTES FOR INTEGRATING SOCIAL AND GENDER ISSUES

Social , Gender and Labor Issues and their Implications

People living in the low-lying coastal and delta regions, such as south-western Bangladesh, are particularly exposed to coastal erosion and land loss, inundation and flooding, and saline contamination of fresh water sources. People living in other cluster based agri-business or manufacturing are affected differently by the environmental and climatic hazards. Geographic location is however not the only determinant of the extent and severity of vulnerability. More than any other factor, poverty determines vulnerability and limits the resilience capacity of individuals and communities. Caused by inequalities in resources, capabilities and opportunities, the communities are made particularly disadvantaged to cope with and recover from vulnerability and shocks from natural disaster.

Of all, adversities affect women more severely than men. Globally, it is largely the role of women to provide food, fuel, water, and the care that the family needs – all of which they do in addition to often earning some cash income. It is widely observed that environment and climate change induced vulnerability cause a disproportionate burden on women, because they are more reliant on natural resources that are more environment and climate-sensitive and have fewer physical (land and other assets) and financial resources, and have very limited access to markets. Women are most often made least powerful because of the social and cultural norms that limit their mobility and participation in decision making. To add to all this, they are often less educated, have less access to information and fewer or no opportunities for learning anything new.

It is widely recommended that active involvement of women in taking endeavor on enterprise development decision making would be a significant positive step toward achieving sustainable development. And that policies and programs for resilience must take gender differences into account to understand how women have been and would be affected. This would be crucial to formulate gender-differentiated strategies for capacity building of women to respond to the climate change impacts that are associated with the gender-specific roles and responsibilities.

To make the enterprise development activities truly community-based and inclusive, POs will explicitly take into account social and gender concerns into activity selection, review and implementation. In this regard, extensive community consultations would be a key to understanding how the different community groups (in terms of socioeconomic characteristics, gender differentiation, ethnicity and other relevant attributes), perceive of environmental and disaster related impacts, how they cope with the changes that have been underway, and what measures -- according to their experience -- would be more effective to sustain to the changing conditions.

Integrating Social and Gender Issues

To ensure that enterprise development activities are socially inclusive, irrespective of geographical location, POs will-

- Prepare the proposed activities in view of the existing and emerging socio-economic and gender issues and concerns that may have resulted, or likely to result, from the micro-enterprises.
- Identify the key factors that have caused or would cause variations among the members of the target communities, in terms of geographical location and socioeconomic characteristics, and between men and women.
- Identify and implement the activities that would effectively address the social and gender issues, with a focus on equity in the distribution of resilience benefits.
- From the PKSF ME experiences, it shows that more than 75% enterprises are women headed. In addition to those for the communities at large, assess feasibility of

alternative measures that would help women to cope with environmental and natural disaster impacts.

Potential Labor Issues Analysis:

It is expected that there will be presence of child labor in the project implementation areas. Many children traditionally work in agribusiness in rural areas, mainly after school hours. In urban and peri-urban areas there are instances of children being involved in potentially hazardous manufacturing sectors. The project aims to not only improve these hazardous conditions but will also engage community to encourage full-time schooling for children, childhood stunting, health and nutrition and awareness regarding the dangers of potentially hazardous work. The following guidelines have to be followed where project finance is applied:

- No child labor is allowed in the project activities. According to Labor Law 2006 and Labor Rules 2015, Bangladesh- any labor under the age of 14 will be considered as child labor
- Age between 14 to 18, will be considered as young labors and young labors are not allowed to work in any hazardous place of project activities
- Community people must be informed about the presence of migrated work and their job role.

Social and Gender Analysis

The objective is to identify the differences and provide evidence for gender roles, activities, needs and available opportunities for men and women. While preparing funding proposals, POs will undertake an assessment of the target communities including women, in order to improve project design and establish a participatory process for implementation and monitoring. This will require analyzing the existing conditions that indicate vulnerability of the different community groups(e.g. social map); their capacity for enhancing resilience; and their ability to share in the benefits of the probable enterprise development activities. Analysis may include, but not limited to, the following information:

- Project location, describing physical characteristics (topography and other features) of the targeted settlements that may cause variations within an targeted zone
- Business Cluster profile, no of enterprises in the cluster, ethnicity, education, major economic activities, formal/informal institutions and rules and behavior, and the scope of strengthening them to assume ownership of the enterprise, and other aspects that may indicate effectiveness of the proposed activities under consideration
- Environmental and geographical vulnerability, indicating equity/inequity in access to and control over land and other resources of different community groups, such as landless, women, ethnic minorities and the like
- Percentage of wage employment and self employment per ME in the cluster, including women

- Existence of common property resources like rivers and other water bodies, forests, etc that are used by the poor in general, and women in particular
- Existing and potential gender issues and concerns related to the roles women play in the household and how they cope with the changes, as well as feedback on alternatives that would lessen their burden
- Assess how women could be integrated into the decision-making process involving project screening, preparation and implementation

Social and Gender Actions in Project Cycle

As an effective way to integrate social and gender issues, the POs will prepare Social Inclusion Plans (SIP). In addition to social safeguards compliance, POs will implement the SIPs to undertake the following activities at different stages in the project cycle:

- POs ensure that social inclusion is integrated into the project goals and objectives, and set targets that are measurable
- Set up a monitoring and evaluation system, and select key indicators that would inform of progress and effectiveness of the activities designed to foster social inclusion
- Organize reporting and feedback processes, identifying who will collect and analyze information, and who will use it and how it will be used to guide activity implementation.
- Carry out capacity development exercises for integrating social and gender issues, and for monitoring and evaluating the social inclusion aspects included in project design
- Collect gender-disaggregated data on the indicators selected for social inclusion targets for the period under evaluation, and feed results into the system to allow any needed corrections
- Identify any gender and other issues, that were not addressed in project design, but faced during implementation, and adopt and implement appropriate remedial actions in consultation with the communities and other stakeholders
- Assess outcomes and impacts of integration of social and gender issues in the overall project context
- Assess outcomes and impacts of the project on men and women, and more specifically on the social inclusion aspects and targets set during project design
- Derive and share lessons that can be fed into the overall SEP goals and objectives

Community/Stakeholder Consultation

Extensive consultations with the community and other stakeholders will be a key to undertaking community-based inclusive enterprise development measures and integrating social and gender issues into the project. In addition to open community meetings, the POs will hold separate consultations/focused group discussions with different communities for a

better understanding of how the enterprise development activities will be helpful for poverty eradication, livelihood support, reduce environmental negative impact and will ensure sustainable development in the grass-root level. Community consultation and participation framework will be an integral part of the social management framework.

Consultations will take place in open meetings and in an environment where the participants, irrespective of social status, would be able to express their observations and opinions freely. The objectives are to:

- Learn about how the communities have been impacted by the different kinds of vulnerability including environment and climate change
- Identify environmental degradation areas where priority to give emphasis needed most
- Identify the common services facilities required to improve environment, climate change and business development aspects
- Discuss the social safeguard implications/impacts, if any, that might be associated with any enterprise activities that are to be implemented by using private and public lands
- Where private and public lands are required, explore the ways and means as to how the lands would be obtained
- Assess and create community capacity to participate in project preparation, supervision and monitoring

POs will document, separately for different communities, the consultation details indicating community experience and perceptions about the vulnerability issues and impacts and their inputs/feedbacks; alternative sustainable measures suggested by both POs and communities; land availability for the chosen measures that may require physical activities and any agreement reached with the communities about it; and other information to confirm community ownership of the projects.

SMF Implementation: Institutional Arrangement

PKSF will establish a Project Management Unit (PMU) to manage SEP. A Supervising officer/Project Coordinator (PC) will be the head of the Unit and be in charge of overall implementation of SEP, including compliance with the social safeguard requirements specified in this SMF. The PC will directly report to the PKSF authority through a designated senior official and be the contact person at PKSF and the World Bank.

The PMU for SEP will have a Program Officer -to assist the Project Coordinator (PC) managing overall implementation of SMF, including compliance with the social safeguard requirements. The PMU will engage necessary number of operational Program Officers for supervision and monitoring activities by POs. The Programme Officers will liaise with the POs and monitor implementation of the individual activity, including those that involve social safeguard issues. The program officer at PMU will guide and assist the POs in SMF implementation monitoring and ensuring compliance of SMF guidelines. They will be the contact points for the POs and will report to the PC.

Monitoring and Evaluation

Monitoring related to enterprise loan will be a part of the existing Program Department of PKSf and to grant financing will be a part of PMU, where the Program officers of PMU will look after all activities, including those for safeguards compliance. The Program Officers will undertake monitoring visits quarterly and seek the validation of the monitoring already undertaken by the POs with community participation. The Program Officers will ensure that the POs involve the local communities in project implementation and monitoring is participatory with representation from different communities, including disadvantaged groups. PMU will prepare a half-yearly report.

The social safeguards compliances issues for all activities, along with other activities, will be reviewed at mid-term and project completion. PMU will undertake corrective measures in implementation and monitoring.

Capacity Building of PKSf and PO's sustainable enterprise in the vulnerable areas is relatively a new and emerging concept in Bangladesh. With the limited experience on these issues, PKSf will establish the PMU with necessary skills and specialized knowledge on enterprise development, environmental management and the natural/climate change vulnerability.

PKSf will arrange training for its and POs' staff to acquire the knowledge and skills required to manage the project and sub-project activities including social safeguard compliance. It will consider local and foreign training and technical backup support from specialized organizations -- if required to continuously improve the capacity of the staff members dealing with activities under SEP.

Grievance Redress Mechanism (GRM)

A two level GRM will be established in this project. First level will be PO (local) level and second level will be central (PKSf) level to deal with any complaints/grievances about environmental and social issues. At the field level, 'Branch Manager' of the PO will be the local Grievance Redress (GR) focal person for addressing the grievances. The concerned Program Officer or any other official nominated by the PC will be the GR focal person at PKSf. The aggrieved persons or entities will address the complaints/grievances to the 'Field Officer' of the POs and submit them in sealed envelopes to the local level focal person ie Branch Manager. The Branch Manager will enter the grievances into the Grievance Register at Local level and issue receipts to the aggrieved persons/entities with the entry reference. Field officer will not open the envelopes, but inform the local GR focal person about receipt of complaints and schedule hearings as per his/her advice. In open meetings, he/she will hear and discuss the complaints and try to resolve them in view of the applicable guidelines of the SMF. The aggrieved person, if female, will be assisted by a female staff of the POs in the hearing, and if from a tribal community, by a tribal representative. It is expected that all

complaints at local level will be disposed within 15 days, failing which the petitioner can seek resolution from the focal person at the PKSf headquarters.

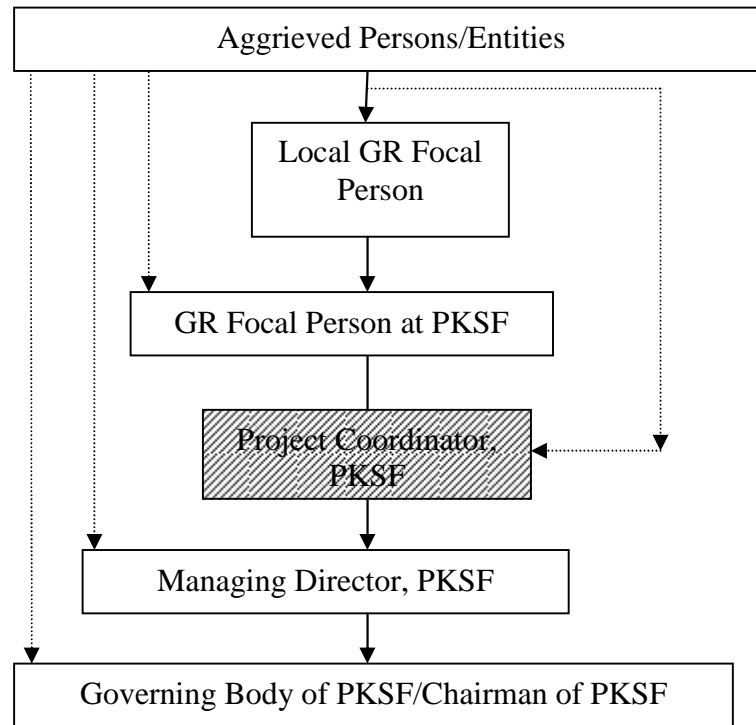


Figure 1: Institutional Arrangement of the GRM

Any time, any aggrieved person can send complaints directly to the MD of PKSf. The MD will review and try to resolve the complaints and may seek advice from the PKSf Chairman/Board about any issues critical to the project. A decision agreed by the complainants at any level of hearing will be binding on the concerned POs and PKSf. The GRM will, however, not pre-empt an aggrieved person's right to seek redress in the courts of law. The institutional arrangement of Grievance Redress Mechanism is illustrated in Figure 1.

The aggrieved persons/entities will also have the option to lodge the complaints directly to the PC (GR focal point at PKSf) if they are against the PO, to the PKSf MD if they are against the PKSf project management and to the Governing body/chairman of PKSf.

The provision of GRM and the process will be well disclosed to the community and the likely affected persons before implementation of the project activity. The disclosure will be done by the POs and ensured by POs. POs/PKSf will keep the records of all resolved and unresolved complaints and grievances and make them available for review -- as and when requested for by the competent authority. The case records will also be posted on the PKSf website.

SMF Disclosure

PKSF will disclose the SMF on its website along with a summary in Bangla and make their hard copies available at its headquarters and other locations (e.g. PO project office) that can be easily accessed by public.

Annex 1: CHECKLIST FOR SUBGRANTS WITH NEGATIVE SOCIAL ATTRIBUTES

[POs will complete this checklist and have to submit to the PMU. PKSF will also use this checklist for physical verification]

PO Name:

Type of Enterprise& Location:

Involuntary Resettlement: Do the proposed project activities:			
1.	Require private land which is to be <i>acquired</i> by using the Bangladesh <i>Acquisition and Requisition of Immovable Property Ordinance, 1982</i> ?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Require private land which is not available on voluntary contribution?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3.	Affect any <i>private homesteads</i> (vita with houses & other assets)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.	Require land that is not available on ‘contribution against compensation’ or other means not acceptable to the landowners?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
5.	Make persons/households using public lands destitute?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
6.	Affect mosques, temples, graveyards, cremation grounds, and other places/objects that are of religious and cultural significance?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
7.	Affect livelihood of vulnerable persons based on the required land?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
8.	Significantly restrict access to common property resources and livelihood activities of groups and communities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Tribal Peoples: Do the activities linked with enterprise development, including physical / construction activities:			
1.	Threaten cultural/traditional way of life of tribal peoples?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2.	Require tribal lands that are to be acquired by using the Bangladesh <i>Acquisition and Requisition of Immovable Property Ordinance, 1982</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3.	Severely restrict access to common property resources (forests, water bodies, etc) and livelihood activities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.	Affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds, etc.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
“Yes” answer to any of the questions under Involuntary Resettlement and Tribal Peoples will make the proposed project <u>ineligible</u> for financing under SEP.			

Annex 2: SOCIAL SAFEGUARD SCREENING FORM

[POs will complete this form and submit to PKSF]

PO Name & Address:

Screening Dates:

A. The Proposed Enterprise

Title:

1. Location of the enterprise and target/beneficiary communities

Village: Union:

Upazila: District:

2. Enterprise proposed for communities where residents are:

- All mainstream or non-tribal peoples
- All tribal peoples
- Majority mainstream or non-tribal peoples
- Majority tribal peoples

3. Brief description of the activities and expected benefits:

.....

4. How do poor in general and women in particular benefit from the proposed activities,?

.....

5. Description of any physical/construction activities that will be required by the project:

.....

B. Community Participation

6. Community consultations conducted on the following dates:

7. Women were consulted separately: Yes No

Consultation minutes are available for review: Yes No

8. Names of PO personnel participated in screening:

.....

9. Names of community members participated in screening:

.....

C. Social Safeguard Issues

10. Were free prior and informed consultations held with the communities? Yes No

If 'Yes', consultation dates:

11. Does the project require any physical/construction activities?

Yes No

12. Will there be a need for lands to carry out the physical/construction works?

Yes No

13. If 'Yes', the required lands presently belong to:

Government (Public Lands: Khas, other GoB agencies, Local Governments)

Private citizens

Commons land

Others (mention)

14. If the required lands are Public Lands, they are presently used for:

Agriculture (No. of persons/households using the lands:)

Residential purposes (No. of households living on them:)

Commercial purposes (No. of persons: No. of shops, etc:)

15. If the required lands are Private Lands, they are presently being used for:

Agriculture (No. of landowners/households:)

Residential purposes (No. of households:)

Commercial purposes (No. persons: No. of shops, etc:)

16. If the required lands are Private, they will be mobilized through:

Voluntary contribution

"Contribution against compensation"

Other means (please mention):

D. Information on Tribal Peoples (TP)

17. If the required lands are Private and belong to Tribal Peoples, they will be obtained through:

Voluntary contribution

"Contribution against compensation"

Other means (please mention):

18. Do the physical/construction works restrict any Tribal Peoples' access to any resources that they use for livelihood?

Yes No

19. If yes, dates of consultation held with the TP communities and their organizations:

Are consultation minutes available for review: Yes No

20. Names of TP community members and organizations which participated in social screening:

.....

21. Is there a traditional Grievance Redress Mechanism (GRM) in the project locality?

Yes No

22. If 'Yes', did any member of this GRM participated in social screening?

Yes No

23. The would-be affected TP have the following forms of rights to the required lands (more than one may apply):

- Legal (No. of TP households:)
- Customary (No. of TP households:)
- Lease agreements with the government (No. of TP households:)
- Others (Mention):
(No. of TP households:)

24. *The following are the three main economic activities of the would-be affected TP households:*

a.

25. *Social concerns expressed by TP communities and organizations?*

.....

26. *The TP community and organizations perceive the social outcomes of the proposed activities for enterprise development:*

- Positive
- Negative
- Neither positive nor negative

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

- Yes
- No

This form completed by (Name of PO official):

Signature:

Date:

Annex 3:IMPACTS ASSESSMENT AND MITIGATION DATA SHEET

[To record information on lands and other assets to be used]

1. PO Name & Address:
2. Types of Enterprise:
3. Location of Enterprise:
 Village: Union:
 Upazila: District:
4. Description of the physical/construction activities that will be implemented under the enterprise:
5. Description of lands used for the enterprise:
6. Public Lands: Total amount used (decimals):

Number of affected users	Squatters	Encroachers	Others (specify)

Other assets affected on public lands:

Livelihood impacted of vulnerable persons:

Private Lands: Total amount used (decimals): Total number of affected landowners:

Other private assets affected:

Livelihood impacted:

7. How the private lands obtained:

	Amount	No. of Contributors
Voluntary contribution		
Contribution against compensation		
Other means (Specify:)		

8. Compensation payment	No. of persons paid	Total amount paid (Tk)
Contributors against compensation		
Squatters		
Others (specify)		

9. **Documentation:** Types of evidence of voluntary contribution obtained:

Signed MOU witnessed by community members

Others (specify)

This form filled in by (Name):**Signature:**

Date:

Annex 4: FORMAT TO DOCUMENT 'CONTRIBUTION OF ASSETS'

PO Name & Address:

Type of Enterprise and Location:

The following agreement has been made on (Day-Month-Year) between (the Owner(s), resident of and the PO (Recipient).

1. That the Owner(s) holds the legal right to the land (Dag No., Khatian No., Mouza, etc) and other assets situated on it.
2. That the Owner(s) hereby voluntarily contributes to the Recipient portion (in decimal) of this asset for the construction of (infrastructure name) for the benefit of the villagers and the public at large. There are no vulnerable groups losing livelihood as a result of this contribution of land, nor are there any other encumbrances on the land.

Either, in case of Voluntary Contribution:

3. That the Owner(s) will not claim any compensation against the contribution of this asset.

Or, in case of Contribution Against Compensation:

4. That the Owner(s) will receive compensation against the contribution of this land and other assets as per the attached Schedule.
5. That the Recipient agrees to accept this grant of assets for the purposes mentioned above.
6. That the Recipient shall construct and develop the (infrastructure name) and take all possible precautions to avoid damage to adjacent land/structure/other assets.
7. That both the parties agree that the (infrastructure name) constructed/developed on the land shall be public premises.
8. That the provisions of this agreement will come into force from the date of signing of this document.
9. That the owner gives up all claims to the land and the title of the land will be transferred to the recipient through the existing legal process in the country.

.....
Signature of the Owner(s)

.....
Signature of the Recipient

Witnesses (Name, signature, father's/husband's name, and address):

1.

Annex 5: SCHEDULE OF COMPENSATION FOR PRIVATE AND PUBLIC LANDS

[For each person who has made ‘contribution against compensation’ and squatter and encroacher who has been paid compensation or assisted in any other form]

1. PO Name & Address:
2. Name of Enterprise and Location:
3. Name of Compensation Recipient:
 Father’s/Husband’s Name:
4. Compensation for: Contribution of land against compensation
 Displacement from public land (squatter/encroacher)
5. Compensation Schedule

Affected Items	Amount/units Compensated for	Agreed Compensation
Land (in decimals)		
Houses/structures (Floor area in sft): Structure type (bamboo, mud, brick, etc.):		
Trees (Number)		
Others (Specify):		
Total Agreed	Compensation:	

Agreed compensation in words:

Agreed Compensation Paid:

Agreed Compensation Received:

.....
 Name & Signature of PO Official

.....
 Signature of Recipient
 (Contributor/Squatter/Encroacher)

Date:

Date:

Annex 6: Coverage of Probable Microenterprise Clusters Under The project

S.N	Agri-business Sector
A	<i>Agriculture Production & Trade Sub-sector</i>
1	Aromatic Rice
2	Banana
3	Floriculture
4	Garlic
5	Ginger
6	Green Chilli
7	Guava
8	Herbal plant (Varieties)
9	High yielding variety vegetable and seed product
10	Litchi
11	Mango
12	Mug Bean
13	Pea Nut
14	Pineapple
15	Potato
16	Safe Vegetable
17	Sea weed
18	Soybean
19	Broccoli & squash
20	Spice
21	Summer Tomato
22	Vegetable

B	<i>Livestock Sub-sector</i>
1	<i>Beef Fattening</i>
2	Buffalo Rearing
3	Cow Rearing/Dairy farm
4	Goat Rearing
5	Sheep Rearing
C	<i>Poultry Sub-sector</i>
1	Duck Rearing
2	Layer Chicken Farms
3	Poultry (Native)
4	Poultry Farm/ Rearing
5	Turkey Rearing
D	<i>Fisheries Sub-sector</i>
1	Crab culture
2	<i>Pisciculture</i>
3	Fish Hatchery
4	Shrimp Culture
Manufacturing Sector	
A	<i>Non-Agri Sub-sector</i>
1	Aluminium Utensils
2	Automobile Workshop
3	Belt making
4	Brass & Bronze Utensil
5	Electronic item production
6	Embroidery/Handicraft
7	Furniture & Fixtures

8	Wig (hair) Processing
9	Hand Loom
10	Handmade Cap
11	Hosiery
12	Jewelry/ Imitation
13	Mini Garments
14	Omanian Cap
15	Leather Processing & shoe making
16	Power Loom
17	Silver Ornaments
18	Vermin Compost
19	Jamdani
20	Terracotta
B	<i>Agri Sub-sector</i>
1	Dry fish
2	Flour Mill
3	Gur
4	Honey
5	Mango bar
6	Milk Product
7	Potato Chips
8	Rice Mill
9	Salt