

**College Education Development Project (CEDP)  
Social Management Framework (SMF)**

**College Education Development Project (CEDP)**  
**Social Management Framework (SMF)**

**1. Introduction**

1. The Government of the Bangladesh as part of its commitment to improve the quality and governance mechanisms of the college subsector as articulated in the 6th Five Year Plan (2011-2015) and the Strategic Plan for Higher Education is planning to implement a new project entitled “College Education Development Project (CEDP)” through the Ministry for Education with the support of the World Bank. This SMF has been prepared to ensure the project’s compliance with the World Bank’s social safeguard policies. It provides general policies, guidelines, codes of practice and procedures to be integrated into the implementation of CEDP. Consistent with the existing national legislation, the objective is to help ensure that activities under the proposed project will:

- i) Enhance positive social outcomes;
- ii) Prevent negative social impacts as a result of either individual institution or their cumulative effects;
- iii) Prevent or compensate any loss of livelihood; and
- iv) Ensure compliance with World Bank safeguard policies.

**2. Project Components**

2. The project’s development objective is to strengthen the strategic planning and management capacity of the college education subsector and to improve the teaching and learning environment of selected colleges. The project envisages improving the quality, relevance and management of college education for improved higher education outcomes. With that objective, the project encompasses three key components that will improve education quality outcomes for students in the tertiary college sector. Component 1: Strengthening the strategic planning and management capacity; Component 2: Improving the teaching and learning environment in selected colleges; and Component 3: Project Management, Communication and Monitoring and Evaluation. The first and second components will use a results-based financing (RBF) approach to support the achievement of GoB’s tertiary education development plan. The main rationale for using a RBF approach is to focus more on achievement of results and to provide incentives to the Government in implementing a set of key sector-wide reforms that strengthen the planning and management of the college education subsector at the national and institutional levels. For each sub-component, a disbursement-linked indicator (DLI) has been identified with time-bound targets. Targets have been selected as key links in a results chain that incrementally contribute to the achievement of the Project Development Objective. Funds would be disbursed upon the achievement of results. Disbursements are expected to take place in June and December of each year and against Eligible Expenditure Programs (EEPs). The third component would finance all technical assistance and capacity building required to achieve the DLIs, and would manage project implementation, using a traditional disbursement mode based on unaudited interim financial reports.

### **Component 1: Strengthening the strategic planning and management capacity**

3. The objective of this component is to strengthen the planning and management of the college education subsector. The Component would support the implementation of the following interventions: (i) development and implementation of initial phase of Strategic Plan for the college subsector which identifies system-wide reforms in phases at the national level; and (ii) improvement of teacher recruitment and management system through filling the teacher vacancies of government colleges and establishment of an appropriate teachers selection commission for the non-government college teachers.

### **Component 2: Improving the teaching and learning environment in selected colleges**

4. The objective of this component is to improve the quality of teaching and learning of college education under the National University. Two sub-components would support the achievement of this objective: (i) Sub-component 2.1: Improving the teaching and learning environment in selected colleges; and (ii) Sub-component 2.2: Strengthening teaching and management capacity in selected colleges.

#### ***Sub-component 2.1: Improving the teaching-learning environment in colleges***

5. Under this sub-component, an Institutional Development Grant (IDG) will be provided to a selected number of eligible government and non-government colleges to support the implementation of Institutional Development Plans (IDP) in the following areas: (i) Upgrading and modernizing basic teaching-learning facilities of colleges; (ii) Improving the connectivity through existing Bangladesh Research and Education Network (BdREN); (iii) Development of soft skills programs and industry-linkages (i.e. internship, job placement cell, tracer studies, etc.); and (iv) Institutional self-assessments for quality assurance.

6. The proposed competitive Grant program will be voluntary. The colleges will be grouped according to student enrollment and will participate based on eligibility criteria. An Operations Manual will be developed to assist colleges for preparing the IDP and implementing the activities included in it by utilizing the IDG. The design of the IDG will benefit from the experience of the IDA-financed two on-going projects: Skills and Training Enhancement Project (STEP) on IDP and Higher Education Quality Enhancement Project (HEQEP) on Academic Innovation Fund in Bangladesh.

#### ***Sub-component 2.2: Strengthening teaching and management capacity in colleges***

7. The objective of this sub-component is to bring about qualitative improvements in teaching and management in the college subsector. This objective would be achieved through support for: (i) training of trainers; (ii) teacher training; and (iii) capacity building of college management staff. The Project would also support the development of training contents and materials. Distance learning through online platforms with international and national training providers will also be developed to reach the large number of beneficiaries.

Training and capacity building activities would be carried out by a 'Training Consortium' comprising personnel from national agencies including NU, Bangladesh Open University (BOU), National Academy for Educational Management, trainers from universities, representatives from colleges, and individuals from the private sector as required. Training will focus on priority subject areas to be confirmed: physics, chemistry, botany, zoology,

ICT, mathematics, statistics, economics, media and mass communications, finance/banking, marketing, accounting, tourism, hospitality, Bangla and English Language. To provide international best practice elements in the design of the training program, a partnership arrangement is envisaged with University of Nottingham, a globally ranked university.

8. Current estimates indicate that training activities would involve about 7,000 teachers from about 500 Masters and Honours colleges, 250 trainers, about 500 college principals, and 250 management personnel from various levels. To address the large numbers, delivery would be designed as a blend of online and face-to-face approaches. An online Training Portal would be developed to provide information on training; access to training materials and best practices; and a communication platform for the community of practice. Training will be carried out largely in Bangladesh with small groups sent for overseas training as required.

9. Key outcomes expected on completion of the training program include: (i) improvement in knowledge, skills and methodologies related to teaching and learning in priority subject areas; (ii) improvement in English Language proficiency and the use of English for Teaching purposes with similar improvement in Bangla; (iii) improvement in the use of technologies in education; (iv) developing sustainable communities of practice; (v) better alignment of teaching-learning provisions across National University Colleges and to international standards of education; and (vi) development of a pool of local trainers to support sustainability of the Teacher Professional Development and Training Program and to play active supervision and mentoring roles.

### **Component 3: Project Management, Communication and Monitoring and Evaluation**

10. The objectives of this component are to ensure sufficient system capacity for the implementation of policy interventions and effective project management in achieving its PDO. These objectives would be met through two subcomponents: (i) Project Management and Communication; and (ii) Monitoring and Evaluation (M&E).

#### **Sub-component 3.1: Project Management and Communication**

11. The objective of this sub-component is to ensure sufficient capacity for implementation of policy interventions and various activities and dissemination of information. This sub-component would support project management, including establishment of a Project Implementation Unit (PCU), specific capacity building and technical assistance necessary for project implementation and communication and information dissemination.

#### **Sub-component 3.2: Monitoring and Evaluation**

12. The objective of this sub-component is to build an effective M&E system. This subcomponent would support M&E activities, including necessary surveys, assessments and validation of outputs, and analytical studies to strengthen the knowledge on the subsector. The monitoring of reform activities would be carried out by MoE, and respective departments of NU and DSHE with the support of the M&E unit of the PCU.

13. The project will select initiatives with the potential to revamp the colleges and college education sub-sector as a whole in areas of quality, relevance, governance and management. The three key components include: (1) Strengthening the strategic planning and management

capacity; (2) Improving the teaching and learning environment in selected colleges and (3) Project management, communication and monitoring and evaluation.

### **3. Social Assessment**

14. Bangladesh has made considerable progress in economic growth and poverty reduction in recent years. Bangladesh's Gross Domestic Product (GDP) grew at an average rate of 6.1% in the past ten years, resulting in a substantial decline in the incidence of poverty. The rapid increase in per capita income has been attributed to sustained economic growth, declining population growth and higher remittance inflow from a growing stock of migrant workers. These developments have led Bangladesh to graduate from Lower Income Country (LIC) to Lower Middle Income Country (LMIC) status in 2015, based on its \$1,080 GNI per capita (Atlas Method) in FY2014.

15. Along with economic development, human development outcomes have also improved for Bangladesh. Significant progress has been made towards achieving the Millennium Development Goals (MDGs) in education. The net primary enrollment rate increased from 66.5 percent in 2005 to 97.3 percent in 2013. Enrollments and pass rates have also increased at the secondary and higher secondary levels since the early 1990s. Gender parity has already been achieved at both the primary and secondary education levels. The Gross Enrollment Rate (GER) in tertiary education increased from 5 percent to 13 percent between 2000 and 2012. The steady increase in the number of students completing higher secondary education has placed a growing pressure on the tertiary education sector to absorb a large and increasing population of eligible secondary students in recent years.

16. However, to accelerate the success in economic and social development improving skills and productivity are crucial. According to relevant economic analysis, Bangladesh's economic growth is expected to continue with around 15 million jobs projected to be created over the next decade in seven key sectors. Job expansion across these sectors will demand more skilled professionals in managerial, technical and leadership positions. However, the current skill levels of the labor force is unlikely to support future market demands. The majority of workers in Bangladesh is under-educated - 76 percent of workers have a secondary educational qualification or below and only 22 percent have a tertiary education level degree, while around two percent have a technical vocational education and training (TVET) certificate or diploma across five major fields of studies in Commerce, Education, Finance, Manufacturing and Public Administration . While there is an abundance of low-skilled workers, there is a strong demand for graduates with higher cognitive and non-cognitive skills and job-specific technical skills. This would require improving the quality and relevance of tertiary education so that education institutions are equipped to produce graduates with more market-relevant skills.

17. Moreover, though Bangladesh has made significant progress in expanding enrollment since the early 2000s, but access to tertiary education still remains low, especially compared with other countries in the region. Enrollment in tertiary education has been rising over time partly due to the increased investment in the expansion of secondary and the rapid growth of private tertiary education institutions since the early 2000s. Despite a sharp increase in enrollment, the tertiary GER still lags behind the rates in neighboring country, Nepal (15 percent), and significantly behind those of middle-income countries such as India (25 percent) and Sri Lanka (17 percent). Public spending in tertiary education also remains low

and inadequate (1.3 percent of national budget in 2014/15) for developing a globally competitive higher education system.

18. **Gender:** Much of the growth in enrolment as mentioned above has come from the college education sub-sector, where female share account for 43 percent of the total enrollment. The number of women teachers is also very low in colleges, accounting for only 21 percent of the total teaching staff. To meet the increasing demand of higher education, private sector colleges have proliferated in recent years. However, the cost of education has become out of reach for poor- and middle-income households which is adversely affecting girl students to access good quality education. Moreover, the current supply of tertiary education is mostly biased to the urban centers and hence keeps girls from the periphery and the disadvantaged living in the rural areas out of access. According to the “Study on National University and Affiliated Colleges in Bangladesh” published by the World Bank in 2014, more than 65% of the people live in rural Bangladesh, while more than 60% of tertiary education seats are available in the urban or semi urban regions.

19. This report also mentions that the results of the HIES 2010 study show that marital status coupled with poverty drastically reduces opportunities for girl students to continue their education. Indigenous communities lagging behind in access to education have low school-level pass rates leading to very low college-level enrollment. Girl students have less chance of continuing higher education compared to their male cohorts. A regression analysis using HIES 2010 illustrates that the poverty status of the student’s family, region (rural and urban) from where the student comes from, gender and marital status of the student play significant roles in determining whether the student would continue after completing HS. If other factors remain unchanged, a female student has 21% less chance of continuing education above grade 12 compared to her male counterpart (World Bank Discussion Paper series report number 65, 2014)

20. As part of IDA Commitment, all IDA funded projects need to address the three dimensions on gender (Analysis, Actions and Monitoring). Moreover, The World Bank through its OP/BP 4.20 emphasizes on addressing local circumstances that may affect the participation of females and males in the project, the contribution that females and males each could make to achieve the project's objectives etc. The impacts on women required to be addressed separately than that of men in general. Also the implementing authority needs to identify strategies to ensure equitable access of project benefits for men and women. While the project include key performance indicators for the project to attain gender-responsive outcomes, the SMF provides guidelines on consultation and communications as well as grievance redress processes in a gender-inclusive manner.

#### **4. Social Safeguard Triggers**

21. The activities identified under the project are predominantly technical assistance in nature (development of soft skills, institutional self-assessment skills etc.) with only small scale civil works components or infrastructure development activities. The proposed project may finance rehabilitation/renovation/refurbishment of existing building, classrooms, and science and computer laboratories facilities.

22. The project will not finance any civil works or activities that are expected to trigger OP 4.12 (Involuntary Resettlement). No land acquisition, displacement of people or communities from private or public lands or any negative impacts on livelihoods will be permissible under

the project. Any infrastructure development and/or refurbishment/extension of existing infrastructure will only be carried out within the current premises of the colleges and educational institutions. Public lands if used will be screened to ensure that the lands are encumbrance free and squatters, leasing farmers, share-croppers etc. are not affected by the project. There will be no requirement for private land acquisition, displacement of communities or people from either public or private lands regardless of title and no adverse impacts on livelihoods of any nature. Therefore, the project will not trigger OP 4.12 Involuntary Resettlement.

23. The project will cover colleges all over the country including areas where Small Ethnic and Vulnerable People (SEVP) live. Thus, the project will trigger OP 4.10. This SMF thus include a Small Ethnic and Vulnerable Communities Development Framework (SEVCDF) and a Gender Action Plan (GAP) for the project. It is important to mention that the project is not expected to cause any adverse impact on SEVC. The Framework focuses on gender and inclusion aspects, and provides guidelines to engage in effective consultation with SEVC in general and students and teachers in particular to maximize the likelihood of achieving the project's PDO for the said communities. Given that the project only triggers OP/BP 4.10, and since the exact locations of project implementation are yet to be determined, the SEVCDF attempts to ensure the participation of all small ethnic and vulnerable communities in the project in a culturally appropriate and sensitive manner, that meets the World Bank's stated requirement of free, informed and prior consultations with the relevant groups during project preparation and during implementation. This SMF has been developed in full concurrence with national laws and applicable World Bank Operational Policies.

24. In order to promote inclusion the project will undertake: (i) stronger awareness raising campaign for ensuring access to and increasing the utilization of the facilities made available by CEDP funding; (ii) initiatives for establishing Industry-University/Colleges collaboration for fostering research relevance; (iii) standardized measurement for quality across the tertiary education in college sector and establishment of an independent body for monitoring and facilitating quality assurance; (iv) initiatives for addressing issues with assessment system and soft skills of the graduates such as IT literacy, communication skills and moral values (v) initiatives for addressing particular needs of SEVC, persons with disabilities and women in accessing the facilities made available by CEDP funding.

### **I. Legal Framework of Bangladesh and Operational Policies and Directives of the World Bank**

25. The constitution of Bangladesh recognizes the presence of the SECs or tribals. The Articles 28 & 29 of its Constitution makes provision of equal rights for its citizens and also stipulates affirmative measures for "disadvantaged sections" of the society. There are also a number of domestic legal documents (such as the Chittagong Hill Tracts Manual 1900, Chittagong Hill Tracts Regional Council and Hill District Councils Acts, or the Bengal Tenancy Act, 1950) that have specific legal provisions for "tribal peoples." Moreover, the present SMF has been prepared based on existing general literature, relevant Bangladesh legislations and policies, and World Bank's safeguards policies. These include the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) 1979, ILO Convention on Indigenous and Tribal Peoples 1989, National Women Development Policy 2011, Convention on the Rights of Persons with Disabilities, Bangladesh Protection of the Rights of the Persons with Disabilities Act 2013, Bangladesh

Education Policy 2010, Biwako Millennium Framework, Bangladesh Right to Information Act 2009, Constitution of Bangladesh, World Conference on Education for all 1990, OP4.10 on Indigenous People, OP4.12 on Involuntary Settlement, and national policies relating to small ethnic peoples and vulnerable communities. Besides these documents, various consultations meetings were held with relevant stakeholders, including communities and the general public, before writing the framework.

26. The table below describes the relevant social safeguard policies of the World Bank and explains the applicability of them to the project.

**Table 1: Operational Policy and Directives of World Bank**

Policy	Key Features	Applicability to this project
<b>OP/BP 4.12 Involuntary Resettlement</b>	<p>Implemented in projects which displace people.</p> <p>Requires public participation in resettlement planning as part of SA for project.</p> <p>Identification of “those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country).</p> <p>Intended to restore or improve income earning capacity of displaced populations in addition to their resettlement.</p> <p>Intended to provide compensation for lost assets and other resettlement assistance to “those who have no recognizable legal right or claim to the land they are occupying.</p>	<p><b>Not Applicable.</b></p> <p>No land acquisition or displacement of people from public or private lands is permissible under the project. This is explicitly mentioned in the SMF.</p>
<b>OP/BP 4.10 Indigenous Peoples</b>	<p>Purpose is to ensure indigenous peoples benefit from Bank financed development and to avoid or mitigate adverse effects on indigenous peoples.</p> <p>Applies to projects that might adversely affect indigenous peoples or when they are targeted beneficiaries.</p> <p>Requires participation of indigenous peoples in creation of “indigenous peoples development plans”.</p>	<p><b>Applicable.</b></p> <p>The project will likely work in areas where indigenous people live and will engage with them for the improvement of their skills for employment. The project will trigger OP 4.10. A Small Ethnic Communities Development Framework (SECDF) will be followed. The SMF also includes the Communications and Inclusion components and address gender issues and those of very vulnerable people in a more focused manner. The SMF includes a Grievance Redressal Mechanism that is easily understandable and accessible at local levels.</p>
<b>OP/BP 4.11 Physical Cultural Resources</b>	<p>Purpose is to assist in the preservation of cultural property, such as sites having archeological, paleontological, historical, religious and unique cultural values.</p> <p>Generally seeks to assist in their preservation and avoid their elimination.</p> <p>Discourages financing of projects that will damage cultural property.</p>	<p><b>Not Applicable.</b></p> <p>It is not expected that any sub-projects to be designed and implemented by the project will affect, modify, or reverse any designated physical cultural resources. Projects near physical and cultural resources are included in a negative list.</p>



Policy	Key Features	Applicability to this project
<b>OP/BP Gender Assessment</b>	<p><b>4.20</b> Gender Assessment includes</p> <ul style="list-style-type: none"> <li>• different socioeconomic roles of females and males</li> <li>• male-female disparities in access to, control over, and use of assets and productive resources</li> <li>• male-female disparities in human development indicators</li> <li>• Relative participation of females and males in development decision-making</li> <li>• laws, institutional frameworks, norms, and other societal practices that lead to gender discrimination and/or gender inequality</li> </ul>	<p><b>Applicable.</b> Necessary measures to mainstream gender will be followed by the project</p>

## 5. Objectives and components of SMF

27. The main purpose for preparing the SMF is to formulate appropriate social safeguard principles and provide technical guidelines to identify impacts, prepare safeguard plans, and mitigate adverse impacts that are likely to arise from the activities financed by CEDP during implementation. The SMF spells out the potential social impacts during the planning, design, implementation and operation of the CEDP project and outlines the management measures required for an effective addressing of the same. Appropriate institutional arrangements towards implementing the measures proposed under the SMF and capacity building efforts required are detailed in the framework. The adoption of this framework will help ensure that the project meets the national as well as local level social requirements while also being consistent with the relevant safeguards policies and provisions of the World Bank.

5.1 The specific objectives of the SMF are to:

- A. Present findings from the rapid assessment of social issues related to tertiary education in college sector in Bangladesh and the specific interventions that CEDP seeks to make, highlighting in particular the potential positive and negative impacts of the project;
- B. Review policy and acts/ regulations of Bangladesh and the World Bank in order to identify applicable provisions in the proposed project and suggest ways to fill gaps, if any, between Bangladesh and World Bank requirements;
- C. Assess the capacity of institutions involved in the project, including the roles and responsibilities, and offer guidelines for capacity development to address any gaps; and
- D. Develop a framework, the Social Management Framework that incorporates measures for Addressing small ethnic and vulnerable peoples and gender concerns in the project while also presenting mechanism for information disclosure, consultations, monitoring and evaluation, grievance redress, etc. during project implementation.

## 5.2 Basic principles

28. The Framework is based on an assessment of the nature, scope, and scale of safeguards impacts of the project components and institutional capacity of colleges and the implementing agencies to address social safeguards issues. The following principles will apply for selection of colleges and activities:

- A. All proposed colleges to be funded by the projects will be subject to a social and gender screening in order to assess the prevalence of female students as well as of students from Small Ethnic and Vulnerable People.
- B. The institutions will not propose to undertake activities that may require land acquisition, or displacement of communities (regardless of title), or adverse impacts on livelihoods. All development works will be limited to improvement of the existing infrastructure if needed, and use their own land which must be free of encumbrances, for any new structures (if applicable). In such reconstruction and improvement of infrastructure the institutions will undertake particular measures to ensure that the infrastructures are accessible to persons with disability

## 6. Development of SMF

29. The (sub) project activities proposed during project pre-feasibility study were analyzed along with inputs from review of literature, stakeholder's consultations and field visits to assess the potential social impacts (both positive and negative) of the project (A list of stakeholders consulted has been provided in annex 3).

## 7. Enhancing the Positive Outcome of the Project for Small Ethnic and Vulnerable Communities

- 7.1 Consultation: Consultation is suggested with the Small Ethnic and Vulnerable Communities' representatives to incorporate their voices, providing them a sense of ownership and their active participation.
- 7.2 Identification of special needs: Special needs identification needed to support them effectively and efficiently. One major issue in this regard can be language skill. As many of the SEVC are not fluent in Bangla or English other than their own ethnic languages and thus may not get opportunities to equally to study in urban mainstream educational colleges, rather complete schooling in local schools with local teachers. Helping them to break their inertia to have inter community interaction as well as interaction with Bengalis will remove the existing language barriers.
- 7.3 Sensitization of the wider student-teacher body regarding SEVC's, culture, customs, rituals and gender issues etc.: Get to know each other's culture always gives space for more interaction, knowledge sharing and trust building among different communities. Colleges can think of a yearly event of day long cultural activities of all the tribal communities to showcase their cultural elements such as rituals, dance, music, costumes, and customs etc. which will bond them more and make the wider body having more interest in these cultures.
- 7.4 Identifying areas where students of SEVC require additional assistance: Specific assistance needs of the SEVC, should be identified in order to offer additional support to them. These may vary in different faculties and regions.

## 8. Small Ethnic and Vulnerable Communities Development Plan

30. Once the exact colleges targeted under this project are determined, they will be screened to assess the presence of SEVC according to the screening formats attached. For institutions where students from SEVC are found in larger numbers, the above framework will be used as guidance to prepare Small Ethnic and Communities Development Plan to address the issues of participation, inclusion and enhancement of positive outcomes for SEVC.

### **9. Safeguards screening & mitigation guidelines**

31. Safeguard screening will consist of an examination of requirements of the possible activities, and the guidelines that will apply in terms of funding eligibility and impact mitigation. The following guidelines, practice codes and requirements will apply in selection, design and implementation of particular activity:

- 9.1 Negative List. The activities that have characteristics as those described in the ‘Negative List’ below will be ineligible for funding under CEDP.
- 9.2 Where Small Ethnic Communities are identified in the project’s area of influence, an SEVCP will be developed and implemented by the project following the guidelines of SEVCDF.
- 9.3 Throughout the lifetime of the project, all implementing colleges will take pro-active measures to ensure that the gender equity is mainstreamed in project activities. The project will prepare a gender action plan during the initial stage of the project to be followed by the colleges

### **10. Screening and mitigation responsibilities**

32. At the institution levels, the Project Implementation Unit will screen the projects to ensure compliance with the above principles. For location specific sub-projects that trigger OP 4.10 the PCU will ensure that adequate and appropriate consultation modalities are adopted to build consensus among the SEVC and women, identify impacts in the light of their unique needs and way of life and implement mitigation measures commensurate with their cultural, religious and societal norms. The project mainly works on the supply side of the tertiary education quality enhancement and development. The curriculum can be made more accessible to SEVC and women by understanding their needs and exploring their career aspirations. The PCU may conduct a needs assessment survey amongst students, focusing on students from SEVC and women.

### **11. Grievance redress**

33. The NU and colleges will set up a procedure to address complaints and grievances regarding CEDP procedural irregularities and environmental and social guidelines. The procedure will however not pre-empt an aggrieved person’s right to seek redress in the courts of law. All complaints will first be discussed in open meetings at NU and the colleges. If this fails, the NU and colleges can refer the complaints to the PCU with the minutes of the hearing taken place at the college level. If PCU fails to resolve the matter, it can refer the unresolved cases to MoE. Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB’s Grievance Redress Service (GRS). For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), they will be advised to visit: <http://www.worldbank.org/GRS> and for the World Bank Inspection Panel to: [www.inspectionpanel.org](http://www.inspectionpanel.org).

## 12. Capacity building

34. The PCU has limited institutional capacity to implement the SMF. Specific capacity-building training programs for the PCU needs to be planned for the project. Furthermore, NU should also have a designated officer who will be responsible contact person for matters related to SMF.

## 13. Approval and disclosure

35. As required by the World Bank's project financing policy, the SMF prepared by the GOB will be subjected to review and clearance by the designated regional sector unit of the Bank and then finalized before formal appraisal of the project. The SMF, including a Bangla version, will be disclosed to the public in Bangladesh by the Bank at its Country Office Information Center, and by the MoE at its website. The Bank will also disclose it in its InfoShop.

## 14. Negative list

36. The negative characteristics of activities, which will make them ineligible for support under CEDP, are based on their probable social impacts. With the available implementation experience, it is apprehended that institutional capacity may not be adequate to manage the impacts listed below.

<b>Negative Social Attributes</b>
<p>Activities that involve involuntary resettlement of people/households will be ineligible for support under CEDP. Such activities are those that</p> <ul style="list-style-type: none"><li>• Poses any direct or indirect discriminatory criteria for selection</li><li>• Require land acquisition</li><li>• Require involuntary contribution of private lands</li><li>• Affect private homesteads</li><li>• Communities are unable to compensate for lands that are available on 'contribution against compensation' basis.</li><li>• Render households using public lands destitute</li><li>• Affect mosques, temples, graveyards, cremation grounds, and other places/objects that are of religious and cultural significance</li><li>• May significantly restrict access to common property resources and livelihood activities of groups and communities</li></ul>
<p>Activities that affect Small Ethnic and Vulnerable Communities and Women with long-term consequences will be ineligible support. These activities are those that poses possibility of exclusion</p> <ul style="list-style-type: none"><li>• Threaten cultural tradition and way of life</li><li>• May severely restrict access to common property resources and livelihood activities</li><li>• May affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds, etc.)</li></ul>

## Annex 1

### **NEGATIVE LIST OF SOCIAL ATTRIBUTES OF ACTIVITIES UNDER COLLEGE EDUCATION DEVELOPMENT PROJECT (CEDP)**

25. The negative characteristics of activities, which will make them ineligible for support under CEDP, are based on their probable social impacts. With the available implementation experience, it is apprehended that institutional capacity may not be adequate to manage the impacts listed below. However, it should be noted that the list is not immutable and can be modified as the implementing agency gathers experience and develops capacity to deal with social issues.

<b>NEGATIVE SOCIAL ATTRIBUTES</b>
<p>Activities that involve <u>involuntary resettlement</u> of people/households will be ineligible for support under CEDP. Such activities are those that</p> <ul style="list-style-type: none"><li>▪ Poses any direct or indirect discriminatory criteria for selection</li><li>▪ Require land acquisition</li><li>▪ Require involuntary contribution of private lands</li><li>▪ Affect private homesteads</li><li>▪ Communities are unable to compensate for lands that are available on 'contribution against compensation' basis.</li><li>▪ Render households using public lands destitute</li><li>▪ Affect mosques, temples, graveyards, cremation grounds, and other places/objects that are of religious and cultural significance</li><li>▪ May significantly restrict access to common property resources and livelihood activities of groups and communities</li></ul>
<p>Activities that affect <u>indigenous peoples</u> with long-term consequences will be ineligible support. These activities are those that</p> <ul style="list-style-type: none"><li>▪ Poses possibility of exclusion</li><li>▪ Threaten cultural tradition and way of life</li><li>▪ May severely restrict access to common property resources and livelihood activities</li><li>▪ May affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds, etc.)</li></ul>