Project Information Document (PID)

Concept Stage | Date Prepared/Updated: 15-Jun-2020 | Report No: PIDC29418

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BASIC INFORMATION

A. Basic Project Data

Country Bangladesh	Project ID P174085	Parent Project ID (if any)	Project Name Recovery and Advancement of Informal Sector Employment (P174085)
Region SOUTH ASIA	Estimated Appraisal Date Aug 18, 2020	Estimated Board Date Dec 01, 2020	Practice Area (Lead) Social Protection & Jobs
Financing Instrument Investment Project Financing	Borrower(s) Financial Institutions Division, Ministry of Expatriate Welfare and Overseas Employment	Implementing Agency Palli Karma-Sahayak Foundation (PKSF)	

Proposed Development Objective(s)

The objective is to increase the employability and productivity of low-income urban youth and returning migrants, especially those affected by the COVID crisis.

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	250.00
Total Financing	250.00
of which IBRD/IDA	150.00
Financing Gap	0.00

DETAILS

World Bank Group Financing

International Development Association (IDA)	150.00
IDA Credit	150.00

Non-World Bank Group Financing

Counterpart Funding	100.00
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Environmental and Social Risk Classification	Concept Review Decision		
Substantial		Track II-The review did authorize the preparation to continue	

Other Decision (as needed)

B. Introduction and Context

Country Context

- 1. Bangladesh has made rapid social and economic progress in recent decades, reaching lower-middle income status by 2015. Gross domestic product (GDP) growth averaged close to 6 percent annually since 2000 and, according to official estimates, accelerated to over 8 percent in FY19. Strong labor market gains contributed to a sharp decline in poverty, with the national poverty rate falling from 48.9 to 24.3 percent between 2000 and 2016, while extreme poverty declined from 34.3 to 12.9 percent. Bangladesh's growth has been driven by manufacturing, most notably the readymade garment (RMG) sector. By creating several million waged jobs for women, employment outcomes improved sharply, with overall employment growing 2.4 percent annually between 2000 and 2016, female employment at almost twice that rate, and waged employment by 5.7 percent annually.
- 2. The pace of poverty reduction slowed in recent years even as growth accelerated, particularly in urban areas and in the west of the country. Similarly, the progress on shared prosperity slowed between 2010 and 2016 after a decade of improvements, with annual consumption growth of the bottom 40 percent trailing that of the overall population (1.2 versus 1.6 percent). This period of growth and poverty reduction was accompanied by rapid urbanization, and growing concentration of poverty in urban areas. As Bangladesh urbanizes, divergent trends are emerging in poverty reduction between urban and rural areas (Hill and Genoni 2018). While poverty rates fell in both rural and urban areas between 2010 and 2016, the pace of poverty reduction has been decelerating for urban areas compared to rural areas. Between 2010 and 2016 rural areas saw an 8.5 percentage point decline in poverty while urban areas saw only a two percentage-point decline in the same period. In terms of extreme poverty, there has virtually been no progress in reducing extreme poverty in urban areas compared to rural areas.
- 3. International migration has played an important role in the country's development narrative in terms of household income and macroeconomic stability. By migrating to overseas markets, workers that had prior work experience in Bangladesh are able to earn three to four times more than what they had earned before migrating.

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¹ Household Income and Expenditure Survey, 2000/01 through 2016/17.

About eight percent of households in Bangladesh have at least one member working as an international migrant.² The international migration flows are substantial with 597,000 workers being deployed from Bangladesh into overseas markets every year, on average, in the 2012-17 period. Remittances flowing back to migrants' households are also important, equivalent to about two-thirds of total income in households with at least one international migrant. The international remittance flows are also critical for aggregate growth and macroeconomic stability. Remittance flows are equivalent to six percent of GDP, and greater than four times FDI and ODA combined. By value, it is equivalent to a third of export revenue. Recognizing the importance of international migration, the topic features prominently and regularly in the country's development strategy, as reflected in its Five-Year Plans prepared by the Planning Commission and in the forthcoming National Jobs Strategy.

- 4. Bangladesh entered the COVID-19 crisis with a relatively strong macroeconomic position. Garment exports and remittances narrowed the external deficit in recent years and international reserves were adequate at the end of April 2020 at US\$ 32.9 billion, equivalent to six months of imports. While tax collections are amongst the lowest in the world, under-execution of the budget has contained the fiscal deficit, which has been below 5 percent of GDP since FY01. As a result, public debt is low and stood at 33.7 percent of GDP at the end of FY19. A key economic vulnerability is in the banking sector where the non-performing loan (NPL) ratio is high at 9.3 percent of outstanding loans in December 2019, and is underestimated considering significant under-provisioning, regulatory forbearance, and gaps in the legal framework.
- 5. The COVID-19 pandemic brought about major disruptions to economic activity domestically and through declining exports and remittances³. In the first half of FY20 (July to December), growth decelerated as slower global trade and deteriorating external competitiveness lowered exports and tighter access to finance constrained private investment growth. As the pandemic intensified abroad, export orders from Europe and the United States declined precipitously and an estimated US\$ 3.2 billion in RMG orders were cancelled or suspended.⁴ Remittance inflows declined by 23.6 percent year-over-year in April 2020 and exports declined by 82.9 percent in the same period. In FY19, inflation remained modest at an average of 5.5 percent, primarily driven by a rise in non-food prices. Demand for food surged with precautionary purchases ahead of the national lockdown but has eased more recently as government food distribution programs were implemented. Overall inflation reached 5.4 percent y-o-y by the end of May 2020. GDP growth in FY20 is projected to be in the range of 1 to 1.6 percent. In FY21, growth is projected between 1.0 and -3.0 percent. In the downside scenario, a second round of infections and a prolonged global recession would result in the realization of some contingent liabilities, especially from the financial sector. The recovery is expected to be very gradual, with some increase in export demand and higher public spending amid potential economic disruptions and increasing fragilities in the banking system.
- 6. Involuntarily returning migrant workers, and lower future demand for Bangladeshi migrants may also produce upward pressure on the labor supply. Returning migrants in response to COVID pressures and demand slowdowns in major destinations for Bangladeshi migrant workers also affect the medium-term demand for workers from Bangladesh. Since the start of the crisis, there have been reports of pressure to accelerate involuntary return. In some cases, the volume of returning migrants is expected to be of crisis proportions. ^{5,6} These crashes in migrant flows could be devastating for the economy. Workers that had been previously cleared to

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² In comparison, only three percent of households have at least one member that is a domestic migrant.

³ A national shutdown was in force from March 26 to May 30 to control an accelerating domestic outbreak of the virus, resulting in a sudden stop of many components of the service and industrial sectors.

⁴ Bangladesh Garment Manufacturers and Exporters Association (BGMEA), as of May 22, 2020.

 $^{^{5} \, \}underline{\text{https://www.thedailystar.net/frontpage/news/bangladeshi-migrants-ksa-10-lakh-face-deportation-1899244} \\$

⁶ https://www.wsj.com/articles/india-prepares-large-scale-repatriation-of-workers-stranded-by-pandemic-11588620671

depart with secured jobs are now unable to leave due to the travel restrictions. Finally, there is uncertainty about whether demand for migrant workers may rebound in destination countries, and what occupations may be in demand.

- 7. Simulation analysis suggests that the crisis will increase the poverty headcount, with the more heavily urbanized divisions seeing the greatest increases. If the incomes of informal sector workers in services and manufacturing, and household income from international remittances were to fall by half, along with slower GDP growth, then about 21 million people would fall below the upper national poverty line. Increases in poverty headcount are the most severe in districts with high proportions of urbanization. The longer-term impacts would be more severe due to the limited coping strategies that households may have as. Human capital (especially of children) would suffer if households are urged to respond by reducing food consumption or investments in health and education. Additional negative impacts could happen as productive savings and assets may be depleted, and liquidity constrained microenterprises go out of business.
- 8. Bangladesh is extremely vulnerable to the effects of climate change. The Global Climate Risk Index ranks Bangladesh as the world's seventh most affected country over the period 1999-2018.⁷ Rising temperatures leading to more intense and unpredictable rainfalls during the monsoon season and a higher probability of catastrophic cyclones are expected to result in increased tidal inundation. It is estimated that a one-meter rise in sea levels would submerge 18 percent of arable land in coastal areas⁸. Recent studies estimate that by 2050 Bangladesh could have 13.3 million internal climate migrants⁹. Additional rural-urban migration would have significant consequences for air and water pollution and unsustainable consumption of natural resources, while putting additional pressure on urban labor markets. Addressing climate risks is increasingly becoming urgent to ensure sustainable economic development of the country.
- 9. Moreover, there are persistent structural challenges related to job quality and inclusion. Slowing job creation has stunted transformation of the labor market, where informality and poor job quality remain the norm. Just one in five workers are wage employed, and both formal and informal workers experience poor working conditions and vulnerability. Gender disparities remain acute: just 36 percent of females are in the labor force versus around 82 percent of males and one in three working women are engaged in unpaid work versus give percent of working men. ¹⁰ Among the key barriers to women's access to quality jobs include women's disproportionate responsibility for caregiving and household work, restricted mobility rooted in cultural norms, lower technical skills, and gender-based discrimination in the labor market. ¹¹ Women and youth are bearing the brunt of the recent slowdown in job creation progress on female labor force participation has reversed among urban women in recent years, unemployment among tertiary educated youth has spiked, and underemployment among less-educated youth has persisted.

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⁷ Germanwatch (2020) Global Climate Risk Index 2020

⁸ UNFCC (2007) United Nations Framework Convention on Climate Change

⁹ World Bank (2018) Groundswell: Preparing for Internal Climate Migration

¹⁰ Solotaroff, Jennifer L.; Kotikula, Aphichoke; Lonnberg, Anna Tara; Ali, Snigdha; Pande, Rohini P.; Jahan, Ferdous. 2019. Voices to Choices: Bangladesh's Journey in Women's Economic Empowerment (English). Washington, D.C.: World Bank Group.

Sectoral and Institutional Context

- 10. The challenges facing low-income urban youth are complex and different from other segments of the labor market. The vast majority of employed Bangladeshi youth are working in the informal sector (44 percent) or are self-employed (17 percent) with low income and productivity (Ahmed and Chaudhury, 2019). The monthly wages for informally wage-employed youth are around BDT 9,581, while for those of formally wage-employed youth are around BDT 13,914. This suggests substantial gaps between the informally wage-employed youth (who tend to be less-educated and from poorer households) and formally wage-employed youth (who tend to be better educated and from higher-income households). More than 98 percent of self-employed youth are in microenterprises, which also tend to be informal and lower-productivity compared to larger firms.
- 11. Youth tend be constrained by low educational attainment, having only completed 6.8 years of education, on average. Youth from poorer households have lower educational attainment than those from richer households from 3.9 years for children from the poorest decile in rural areas, up to 9.5 years for those in the higher decile in urban areas (Figure 1). These gaps in educational attainment are clearly reflected in the type of employment that youth are engaged in, with informally wage-employed youth having an average of 6.3 years of education, and with formally wage-employed youth tending to have 9.6 years of education (Figure 2). In addition, the quality of education is often inadequate, and as a result only 51 percent of grade 8 students meet the grade equivalent competency standard in Bengali, and fare even worse in English and math (LASI 2013). Youth with lower educational attainment tend to be in lower productivity activities, as suggested by their lower wages. Psychosocial abilities are also a constraint to labor market outcomes for youth.¹³
- 12. Youth from poorer households are also less likely to have well-developed personal networks especially if they are rural-urban migrants and would thus be penalized by current job matching systems. Formal channels for job-matching account for less than a tenth of matches (and take two to six weeks to match) in Bangladesh. ¹⁴ Informal matching is faster, with workers using family, friends, home village/town, or school alumni networks having median search times of one week two weeks if using a political affiliation.

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¹² For reference, the nominal average household income in Bangladesh is BDT 15,420 and the average per capita household income is BDT 3,800 (HIES 2016/17).

¹³ Non-cognitive skills are related to motivation, integrity, and interpersonal interaction. They may also involve intellect, but more indirectly and less consciously than cognitive skills. Psychosocial abilities are used interchangeably with non-cognitive skills. Cognitive skills require conscious intellectual effort, such as thought, reasoning, or remembering.

¹⁴ Based on data from the College Graduate Tracer Survey 2017 and Enterprise-Skills Survey 2012.

Figure 1: Poorer youth tend to have lower educational attainment

Average years of education for economically active youth by consumption per capita decile

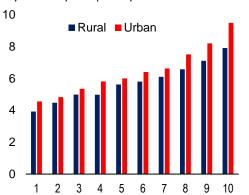
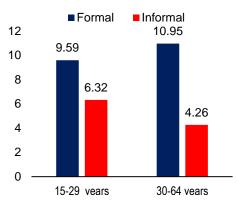


Figure 2: Informal wage-employed youth have less than seven years of education on average

Average years of education of employed youth by formality status



Note: Data for Figure 1 from HIES 2016/17 and for Figure 2 from QLFS 2017

- 13. Female labor force participation is constrained by a range of reasons that include social norms and security. Gender gaps also tend to be quite high, with large differences in labor force participation across gender the labor force participation rate for female youth is 29 percent versus 66 percent for males. Almost half of all female youth are not in education, employment or training, versus 6 percent for males. Conservative gender norms may restrict women's physical mobility and impose differing social practices in relation to the observance of various veiling practices, hindering female labor force participation (Ahmed and Sen 2018). Childcare and household responsibilities are also found to be major factors that reduce female labor force participation (Raihan et al. 2018). Fears and anxieties about security have been found to have noticeable impacts on female mobility among the poor in Dhaka (Kotikula et al. 2019). Women who report lack of safety are 10 percent less likely to participate in the labor market. One-in-four poor Dhaka women only leave their community once a month, while one-in-ten never leave the community.
- 14. Self-employment and employment in microenterprises are also a major avenue of employment for youth. In general, 98 percent of all permanent establishments in Bangladesh microenterprises and account for half of all employment. However, microenterprises account for more than 83 percent of youth informal wage-employment (and 92 percent of older adult informal wage-employment). Microenterprises are also the firm-type that tends to employ less-educated youth. 78 percent of youth with only a primary school certificate are employed in microenterprises, compared to 60 percent of youth with at least a higher secondary certificate. There is evidence that more youth are interested in becoming entrepreneurs, but lack knowledge and access to capital. Focus group discussions with the beneficiaries of select labor market programs administered by the Government of Bangladesh suggest that many of those that do not enter the labor market after completing programs would have become self-employed had they known how and had access to seed capital. Female beneficiaries expressed a preference for self-employment over wage-employment due to a perception that it would allow for easier navigation of social norms, childcare, and mobility constraints. Access to finance also differs by gender, however. Female borrowers

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¹⁵ Calderon (2014), Honorati (2015), and Peña and Glassman (2004) describe the impact of childcare on female labor market outcomes. Dunckel-Graglia (2013) provides an example of a transportation intervention to reduce violence against women on transportation from Mexico.

from the review of GoB program raised 37 percent of their startup capital from family funds, on average, compared to 46 percent raised by their male peers (Rahman and Bartl 2020).

- 15. There are few, if any, programs designed to address the other factors constraining the labor market outcomes of poor and less-educated youth. The most ubiquitous active labor market programs (ALMPs) are short-term technical and vocational training courses which have been found to important in upgrading the labor supply, especially for formal sector employment, but may not be suitable instruments for the substantial shares of youth with low educational attainment. Informal wage-employed youth only have 6.3 years of education on average while formal wage-employed youth have 9.5 years of education on average. About a quarter of informally employed youth and nine percent of formally employed youth have not even completed primary schooling. However, formally administered short-term vocational training courses have minimum requirements that most youth cannot meet. In the area of self-employment, some programs implemented by NGOs provide unstructured mentorship or business counseling, on an ad hoc basis from program staff, while others refer interested beneficiaries to micro-finance products that may be offered separately. There is no bundling of these mentoring/counseling services together with a financing package. Focusing on factors facing women, the World Bank's pilot Northern Areas Reduction-in-Poverty Initiative (NARI) project focused on providing secure transportation and housing to young women as they undertook technical training for wage-employment in the RMG sector.
- 16. The need for targeted labor market programs for those in the informal sector has been made more urgent by the ongoing COVID-19 crisis, due to the urban informal sector being disproportionately affected by the COVID-related shocks. These informal workers do not have access to pensions or any formalized support from employers or the Government in case of an income or health shock at the household level (Bangladesh Jobs Diagnostic 2017). During the current crisis, the GoB has taken important measures to extend much needed social protection to the vulnerable groups identified above through a wide range of initiatives. This includes a 10 percent increase in the social protection budget allocation for FY2019-20, as well as wage subsidies for formal workers of export-oriented industries. Urban informal sector workers are expected to receive some cash transfers to support consumption but will still not receive any labor market activation support¹⁶. In terms of the Government's support for enterprises where informal and low-income workers are concentrated, there are gaps in the stimulus packages. Much of the support for the private sector beyond RMG is being channeled through Bangladesh Bank, leaves banks to bear credit risk, and the impact may be restrained by lack of liquidity and risk aversion. Informal microenterprises are not covered by these COVID-response assistance and stimulus packages.
- 17. Involuntarily returned migrants could face additional challenges even after return, and there are no programs to support their transition back to the domestic economy. Between January to April 2020, over 250,000 migrants have returned to Bangladesh, and estimates suggest over 100,000 are expected to return once commercial flights resume. These movements create health risks for migrants who are moving in large groups as well as the local population at home because of the limited screening facilities at the airport and other ports of entry. Once back home, returnees will face multiple challenges including lack of employment opportunities; limited access to social safety nets; large debts incurred in financing migrations costs, and even discrimination by community members fearful that migrants may transmit COVID-19.

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¹⁶ As part of the COVID-19 response, the GoB has initiated an unconditional one-time BDT 2,000 cash transfer targeted to informal sector workers, to low-income informal workers, day laborers, and self-employed individuals whose earnings have been impacted by the crisis, including many in urban areas.

Relationship to CPF

- 18. The project aligns very clearly with the Bangladesh Country Partnership Framework (CPF) FY2016-2020, South Asia Regional Strategy, and the Bangladesh Social Protection and Jobs sector strategy. The CPF noted that the fundamental challenge for Bangladesh's growth and poverty reduction progress was the need to accelerate the pace of job creation while improving the quality. The CPF identifies human development, including better labor market outcomes, as a foundational priority for growth and poverty reduction in Bangladesh. These priorities in turn are reflected in the Regional Strategy where jobs are included as major pillars for growth and social inclusion. The Bangladesh Country Management Unit's commitment to the jobs agenda is illustrated by its support of the Jobs Platform (P165929), and the Jobs Development Policy Credit operation (P167190).
- 19. This project falls under Pillar 2 of the World Bank Group COVID-19 Crisis Response Approach for both Restructuring and Resilient Recovery Stage activities. Pillar 2 of the approach is focused on *protecting the poor and vulnerable*. The proposed project will be aligned with the *restoration of human capital* objective by supporting the immediate consumption needs of migrant workers from low-income households that are returning due to COVID-related push factors in destination countries. This would be framed within the Restructuring Stage of the WBG's COVID response. The proposed project's activities to improve their employability and productivity of young, urban and low-income youth will be aligned with the *putting people back to work* objective of the Resilient Recovery Stage of the WBG response.

C. Proposed Development Objective(s)

The objective is to increase the employability and productivity of low-income urban youth and returning migrants, especially those affected by the COVID crisis.

Key Results (From PCN)

- i. Number of beneficiaries engaged in wage or self-employment for at least six months after completion of apprenticeship or self-employment support program (of which, female)
- ii. Increase in earnings six months after completion of apprenticeship or self-employment support program (percentage)
- iii. Number of existing self-employed that remain in business for at least one year following financial support
- iv. Number of returning migrants receiving transitional assistance.

D. Concept Description

20. The key principles of the project are:

- Targeting low-income urban youth: Focus on high-poverty urban and peri-urban areas with the highest rates of informality in the labor market.
- Building systems to facilitate integrated services for informal workers: Establish a case management system for
 informal sector youth seeking services, including registration (inter-operable with other registries, like the
 National Household Database), counseling, referral to services supported under project, and information on other
 services.
- Improving productivity and employability: Improving productivity and employability of youth from low-income households and with low-educational attainment through packages of services that could include on-the-job learning, counseling, access to seed capital, and other services.

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- Supporting informal urban self-employed: Providing financial support and complementary services to informal
 urban self-employed whose livelihoods have been affected by COVID-related factors, but have been ineligible for
 other financial stimuli.
- Addressing reintegration challenges for involuntary return migrants: Providing cash allowances to return migrants
 who face multiple challenges upon return; with these challenges including lack of employment opportunities,
 limited access to social safety nets, and large debts incurred in financing migrations costs.
- COVID-sensitive implementation: Applying implementation protocols that reduce the risk of community transmission during training and payments.

21. The project has five related components:

- Component 1 builds the system that will help workers identify their aspirations, strengths, and constraints (e.g. human capital, or financial). The systems established under Component 1 would be of use in a) screening potential beneficiaries for services provided under Component 2; b) case management of beneficiaries enrolled in Component 2 programs including M&E and tracking employment status of beneficiaries six months after completion; and c) providing information on services offered outside the supported project, depending on the results of the profiling. Component 1 would be open to all interested members of the labor market, aged 15 years and over, although the emphasis would be on services for members of low-income households.
- Component 2 addresses the specific needs of improving the employability and productivity of youth from low-income households through a package of services, including imparting essential life skills; on-the-job-learning opportunities through informal apprenticeships; access to seed capital, and coaching and mentoring. These services would be designed to enable beneficiaries to acquire aptitude and experience for entering informal wage employment or self-employment once they complete the program.
- Component 3 will provide direct financial support to informal urban self-employed individuals whose livelihoods were otherwise performing well before the COVID-crisis, and that will not be eligible for support through the stimulus provided through current Government of Bangladesh support for cottage, micro, small, and medium enterprises (CMSMEs).
- Component 4 would address the immediate and medium-term needs of returning migrants that would enable them to commence the process of reintegration and restoration of livelihoods. This would be done by providing a one-time cash allowance to returning migrants as a safety net measure to help them meet immediate basic needs and linking those interested in reintegrating into the domestic labor market to the case management system and appropriate employment programs described under Components 1 and 2. This component will also enable improvements to the quality and integration of information and service delivery systems under the Ministry of Expatriate Welfare and Overseas Employment to enhance outbound migration processes as and when global demand picks up, as well as allow quick Government outreach, and response in the event of any future shocks.
- Component 5 would be a Contingent Emergency Response Component (CERC). This is a provisional zero amount component to allow for rapid reallocation of loan proceeds from other project components during an emergency.
- 21 The main beneficiaries would be youth (aged 15-34) that are poor, less-educated, in highly urbanized districts, and in the labor market. These segments of the youth labor market face constraints to productive economic activity are not currently addressed by any major programs. There would also be special outreach to workers displaced by the COVID crisis, from jobs in both domestic and foreign labor markets, with special support for returning international migrants. Geographically, the programming would focused on urban and peri-urban areas, where substantial segments of urban informal workers and self-employed have experienced loss or reductions of livelihoods.

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Legal Operational Policies	Triggered?
Projects on International Waterways OP 7.50	No
Projects in Disputed Areas OP 7.60	No
Summary of Screening of Environmental and Social Risks and Impacts	

The overall environmental and social risks are rated as Substantial. Key environmental issues could arise from supporting microenterprises that may use environmentally damaging technologies, and Component 2 beneficiaries potentially starting microenterprises that may affect the environment. The Bank team will work with PKSF to prepare a negative/exclusion list to avoid substantial to high risk activities. The potential risks from moderate risk sub-projects can be managed by appropriate environmental and climate-friendly best practices and screening participating microenterprises for adherence to appropriate standards. To the extent possible, the project would leverage resources and curricula developed through the Sustainable Enterprise Project (SEP) project for clean technologies.

Selection of beneficiaries (including ensuring reduction in gender gap, inclusion of the vulnerable) would be a major challenge given that the recent pandemic has skyrocketed the number of potential youth and enterprises who could be under the project intervention umbrella than they would otherwise be. Due to default difficulties imposed by the pandemic and the resultant complications in monitoring in the field, selection of beneficiaries may fall prey to elite capture. Social norms and barriers to female labor force participation (especially in this trying times) would also pose a challenge that need to be carefully planned and overcome to ensure inclusivity of the project design.

The Palli Karma Sahayak Foundation (PKSF) will be the Implementing Agency (IA) for the Project acting as a Wholesale Financial Intermediary (FI). PKSF has dealt with safeguards issues adequately in the past in World Bank financed projects and are currently implementing Sustainable Enterprise Development (P163250) as well as the Rural Water, Sanitation and Hygiene for Human Capital Development (P169342). The former was under WB?s Safeguard Policy and the latter is under ESF. Therefore, PKSF has experience in both the systems of WB to assess and mange E&S issues.

Given the involvement of its Partner Organization (PO) as Participating Financial Intermediaries (PFIs) through which PKSF will provide funds to the beneficiaries, the POs will also need to have in place their own ESMS to assess and address E&S risks and impacts of their subprojects. The PFIs eligibility and selection criteria would be elaborated in the Operations Manual. These PFIs will develop their own ESMSs (in case they do not have ESMS yet) and PKSF will check compliance of these ESMS as illustrated in this ESS. PKSF will provide capacity building measures for its POs selected as PFIs.

CONTACT POINT

World Bank

S. Amer Ahmed, Aneeka Rahman Senior Economist

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Borrower/Client/Recipient

Financial Institutions Division

Ministry of Expatriate Welfare and Overseas Employment Ahmed Munirus Saleheen Secretary ahmedmsaleheen@gmail.com

Implementing Agencies

Palli Karma-Sahayak Foundation (PKSF) Fazlul Kader **Deputy Managing Director (Operations)** fazlulkader@gmail.com

FOR MORE INFORMATION CONTACT

The World Bank 1818 H Street, NW Washington, D.C. 20433 Telephone: (202) 473-1000

Web: http://www.worldbank.org/projects

APPROVAL

Task Team Leader(s):	S. Amer Ahmed, Aneeka Rahman
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Approved By

Environmental and Social Standards Advisor:	S. Amer Ahmed	27-May-2020
Practice Manager/Manager:	Stefano Paternostro	27-May-2020
Country Director:	Mercy Miyang Tembon	18-Jun-2020

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