

Combined Involuntary Resettlement and Indigenous Peoples Safeguards Monitoring Report

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GOVERNMENT OF THE PEOPLE’S REPUBLIC OF BANGLADESH

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

Local Government Engineering Department



Third Primary Education Development Program (PEDP 3)

**Biannual Social Safeguard Management Report
(July – December 2017)**

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Abbreviations and Acronyms

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

1. Introduction

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

Background

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

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

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

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

Small Ethnic Communities (SEC)

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

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

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

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

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

Objectives of SMF

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

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

Social Safeguard Measures and Impacts

PEDP3 comprises the following four key areas:

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

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

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

Screening & Mitigation Guidelines

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

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

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

3. Framework for Small Ethnic Communities Plan

Background

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

The largest concentration is in the Chittagong Hill Tracts but other areas in which these communities live include Chittagong, greater Mymensingh, greater Rajshahi, greater Sylhet, Patuakhali and Barguna. Chakma, Garo, Manipuri, Marma, Munda, Oraon, Santal, Khasi, Kuki, Tripura, Mro, Hajong and Rakhain are some of the well-known adivasi/small ethnic communities of Bangladesh. In the census of 2011, Bangladesh government identifies 29 SECs of population 1,586,141. Different reports provide different numbers of tribal/ethnic minority population and it is estimated to be around 2-3 million. For the purposes of this document they have been referred to as Small Ethnic Communities (SEC).

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

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

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

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

Objectives of Small Ethnic Communities Plan

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

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

Small Ethnic Communities Plan

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

- Fully include indigenous peoples communities in general and their organizations in the process leading to identification, planning and implementation of expansion/improvements works and locations and sites of new schools and dormitories for children and teachers;
- Carefully screen, together with indigenous peoples, the required physical works on existing schools and locations and sites of new ones for a preliminary understanding of the nature

and magnitude of potential impacts, and explore alternatives to avoid or minimize any adverse impacts;

- Where alternatives are infeasible and adverse impacts are unavoidable, immediately make an assessment of the key impact issues jointly with indigenous peoples and others knowledgeable of indigenous people cultures and concerns;
- Undertake the tasks necessary to prepare IPPs with the most appropriate measures to mitigate the adverse impacts and, if opportunities are there, development measures for the general SECs; and
- Not undertake civil works where the SECs remain unconvinced about the benefits to offer broad support for the project

4.0 The Sub-Projects under PEDP 3

4.1 Sub-project Description

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

4.2 Sub-project Location

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

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

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

The cumulative list of 13343 schools screened up to December, 2017 is shown in Table-1. The geographical distribution of the schools is presented in a map of Bangladesh in Fig. 1.

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

RegionName	DIST	Total Sch	Ver	Hor	Ver+Hor	Total Class Room
BARISAL	BARISAL	460	498	867	65	1430
BARISAL	BHOLA	314	330	607	95	1032
BARISAL	JHALOKATHI	69	44	166	15	225
BARISAL	PEROJPUR	158	103	397	45	525
BOGRA	BOGRA	177	132	462	25	619
BOGRA	JOYPURHAT	38	27	83	5	115
BOGRA	PABNA	211	245	385	30	660
BOGRA	SERAJGONJ	485	463	1306	70	1839
CHITTAGONG	BANDARBAN	142	153	388	5	546
CHITTAGONG	CHITTAGONG	430	699	679	94	1472
CHITTAGONG	COX'S BAZAR	116	120	190	0	310
CHITTAGONG	KHAGRACHARI	129	139	342	20	501
CHITTAGONG	RANGAMATI	212	181	627	15	823
COMILLA	BRAHMONBARIA	330	499	517	30	1046
COMILLA	CHANDPUR	272	364	459	55	878
COMILLA	COMILLA	465	684	751	70	1805
COMILLA	FENI	109	103	186	100	389
COMILLA	LAXMIPUR	169	219	337	10	566
COMILLA	NOAKHALI	436	502	917	70	1489
DHAKA	DHAKA	261	596	407	0	1003
DHAKA	GAZIPUR	166	198	284	95	577
DHAKA	MANIKGONJ	144	175	298	25	498
DHAKA	MUNSHIGONJ	137	246	291	10	547
DHAKA	NARAYANGONJ	208	416	348	34	798
DHAKA	NARSHINGDI	204	249	376	5	630
DINAJPUR	DINAJPUR	182	133	365	200	698
DINAJPUR	NILPHAMARI	204	215	375	15	605
DINAJPUR	PANCHAGARH	82	74	173	20	267
DINAJPUR	THAKURGAON	124	142	205	45	392
FARIDPUR	FARIDPUR	244	242	559	30	831
FARIDPUR	GOPALGONJ	166	142	377	30	549
FARIDPUR	MADARIPUR	243	269	500	105	680
FARIDPUR	RAJBARI	87	80	187	20	287
FARIDPUR	SHARIATPUR	154	207	288	85	580
JESSORE	CHUADANGA	55	52	109	15	181
JESSORE	JESSORE	135	88	354	45	457
JESSORE	JHENAIDAH	99	91	185	15	487
JESSORE	KUSHTIA	117	148	275	5	428
JESSORE	MAGURA	75	48	174	40	258
JESSORE	MEHERPUR	37	39	87	10	136
KHULNA	BAGERHAT	222	203	523	41	767
KHULNA	KHULNA	210	172	489	90	751
KHULNA	NARAIL	91	72	233	5	310

KHULNA	SATKHIRA	165	139	445	20	624
MYMENSINGH	JAMALPUR	249	221	623	5	849
MYMENSINGH	KISHOREGONJ	347	475	558	39	1072
MYMENSINGH	MYMENSINGH	567	647	1138	30	1815
MYMENSINGH	NETROKONA	264	255	568	20	843
MYMENSINGH	SHERPUR	116	87	270	5	362
MYMENSINGH	TANGAIL	390	405	818	25	1248
PATUAKHALI	BARGUNA	167	83	420	30	533
PATUAKHALI	PATUAKHALI	195	152	459	50	626
RAJSHAHI	C. NAWABGONJ	98	107	258	15	380
RAJSHAHI	NAOGAON	116	74	264	40	378
RAJSHAHI	NATORE	75	51	173	15	239
RAJSHAHI	RAJSHAHI	87	73	202	20	265
RANGPUR	GAIBANDHA	452	464	967	50	1481
RANGPUR	KURIGRAM	373	309	877	30	1216
RANGPUR	LALMONIRHAT	95	121	155	0	276
RANGPUR	RANGPUR	259	302	446	40	788
SYLHET	HABIGONJ	277	226	585	45	796
SYLHET	MOULVIBAZAR	116	88	252	30	330
SYLHET	SUNAMGONJ	261	243	529	30	802
SYLHET	SYLHET	305	387	451	35	838
Total		13343	14711	27586	2378	44675

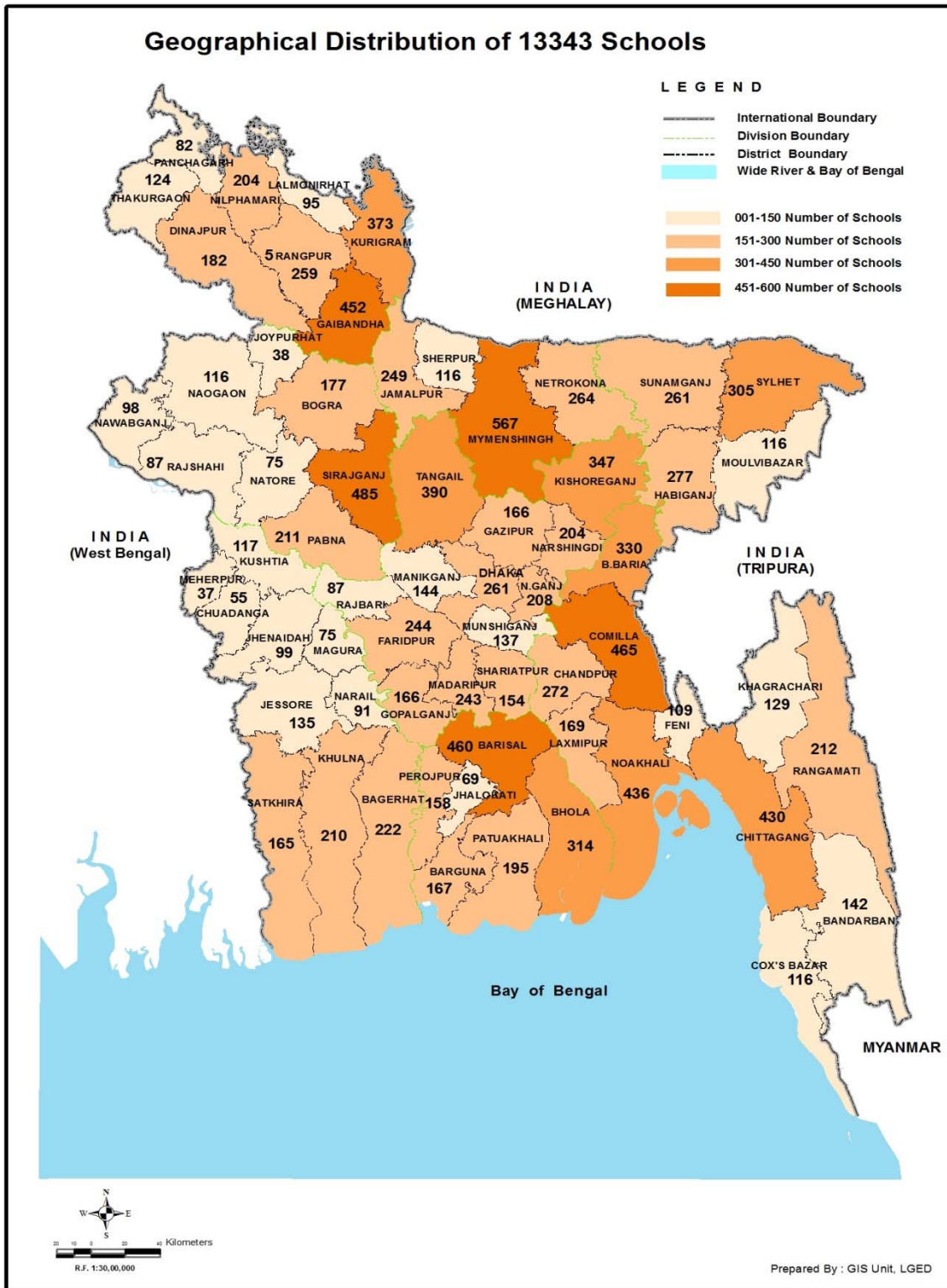


Fig 1; Geographical distribution of 13343 schools

5.0 Screening of the Sub-projects

5.1 Social Safeguard Screening (Cumulative) under PEDP 3

This report covers social screening of total 13,343 schools out of which, 11,101 nos. (83.21%) are located in the plain land and 1046(7.83%) schools in hill region. In the Haor area the number of school is 534 which are 4.0% of total school. School number in coastal area is 662 which are 4.96%. The total scenario based on the above 4 regions can be seen in the Pie chart 1(Fig.2).

Out of total 13,343 schools under PEDP 3, the distribution on basis of type of Classroom construction, total no. of horizontal class rooms is 27,586 which is 61.70%, similarly in case of vertical construction the nos. of classroom is 14711 which is 33.0% of total classrooms. The number of combined horizontal and vertical extension classroom is 2378 which is 5.30% of total classrooms. The Pie chart no.2 (Fig.3) depicts the scenario.

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

5.2 Cumulative Social Safeguard Management Status

During the period from Dec. 2012 to Dec. 2017, social safeguard screenings of total 13,343 nos. of schools have been performed through social safeguard screening format. The region wise status is shown in Table 2 below:

Table 2: Cumulative Status of Social Safeguard Screening of Schools

Region	Total schools	Distribution of school on the basis of SEC	
		All or Majority Mainstream students	Majority Small Ethnic Community students
Barisal	995	965	30
Patuakhali	354	325	29
Bogra	920	821	99
Rajshahi	369	248	121
Chittagong	1046	856	190
Comilla	1796	1714	82
Dhaka	1128	1090	38
Dinajpur	546	488	58
Faridpur	857	774	83
Jessore	496	468	28
Khulna	668	606	62
Mymensingh	1994	1827	167
Rangpur	1201	1171	30
Sylhet	973	826	147
Total	13343	12179	1164

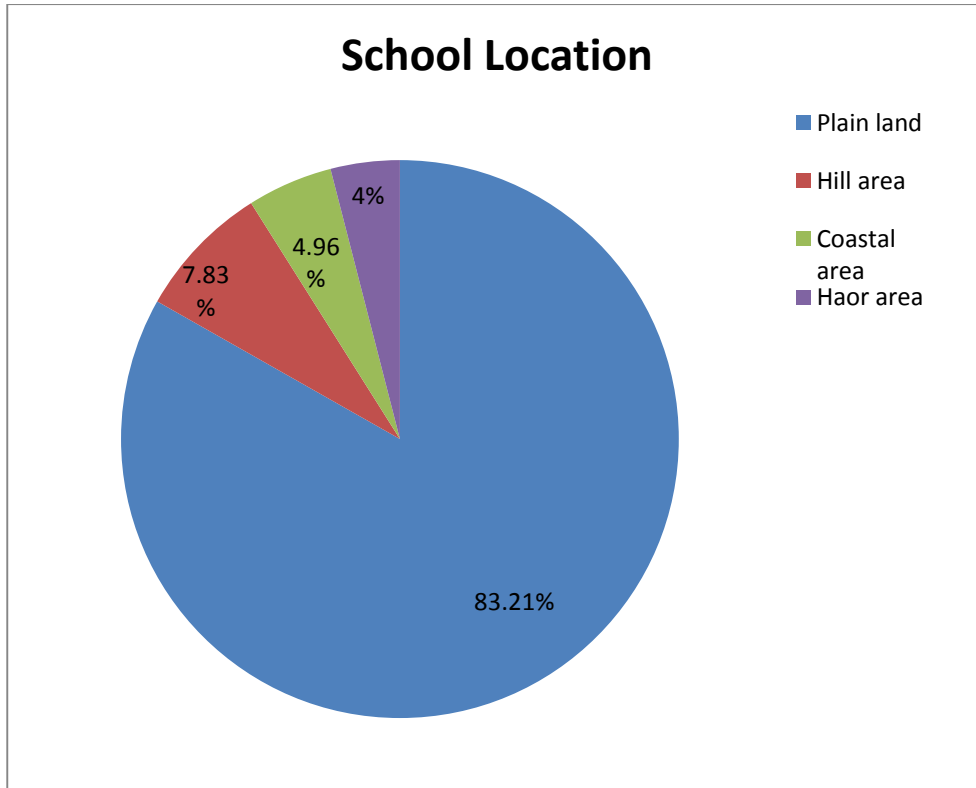


Fig.2: Area wise school location

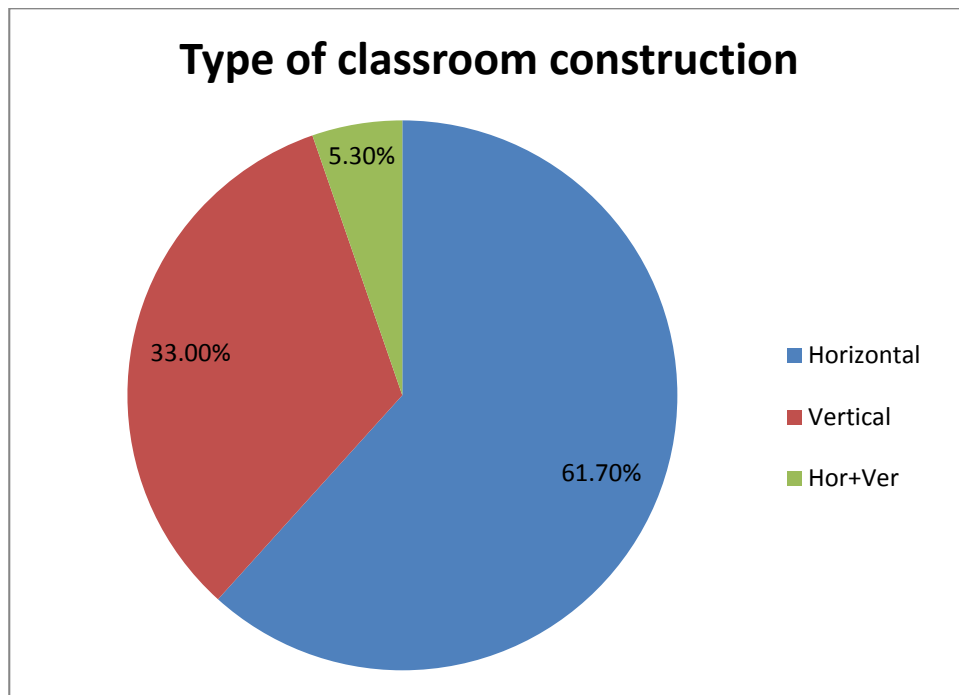


Fig.3 Type of classroom construction

A bar chart of schools on the basis of community population (in school catchment) is shown in Fig.4.

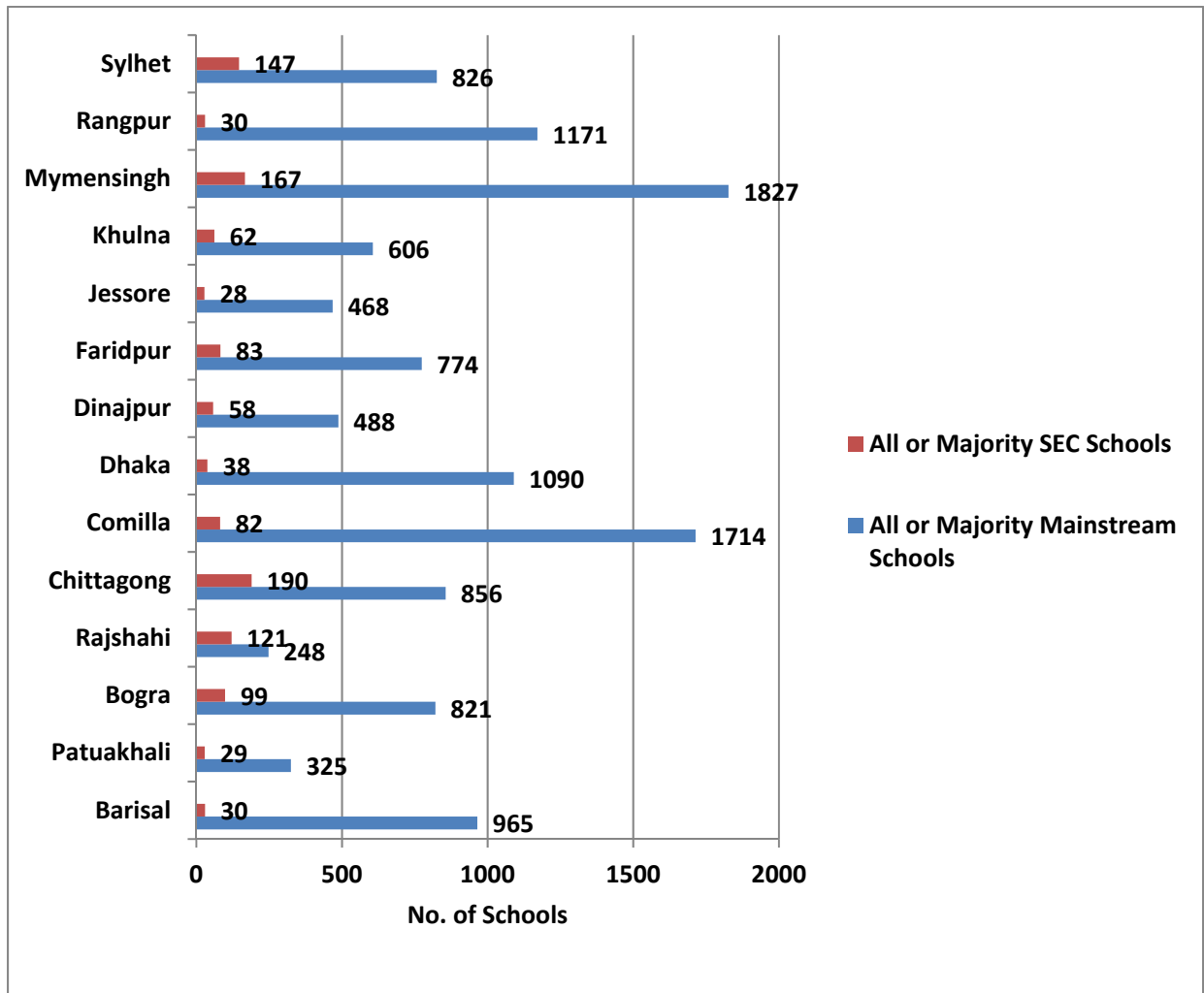


Figure 4: Bar Chart of cumulative nos. of schools on the basis of student type



Fig 5. East Kodalia GPS, Kaptai, Rangamati



Fig 6. Moidongpara GPS, Kaptai, Rangamati



Fig 7. Uttar Baraghop GPS, Kutubdia, Cox's Bazar.



Fig 8. Chongrachari GPS, Kaptai Rangamati

6. Social Safeguard Management during the Period

Social Safeguard Screening of Schools

MoPME had given approval for construction of new classrooms for 649 nos. dilapidated schools under the component of 'Education in Emergency'. The social safeguard screenings of the schools have been performed through social safeguard screening format (Annex A). After screening it was found that 54 schools are located in Small Ethnic Community areas. The region wise status is shown in Table 3 below:

Table 3: Status of Social Safeguard Screening of Schools

Region	Total schools	Distribution of school on the basis of SEC	
		All or Majority Mainstream population	Majority Small Ethnic Community population
Barisal	54	52	2
Patuakhali	25	23	2
Bogra	36	31	5
Rajshahi	25	19	6
Chittagong	33	27	6
Comilla	72	69	3
Dhaka	47	45	2
Dinajpur	73	66	7
Faridpur	79	72	7
Jessore	46	44	2
Khulna	52	49	3
Mymensingh	36	33	3
Rangpur	38	38	0
Sylhet	33	27	6
Total	649	595	54

A bar chart of schools on the basis of community population in school catchment is shown in Fig.7.

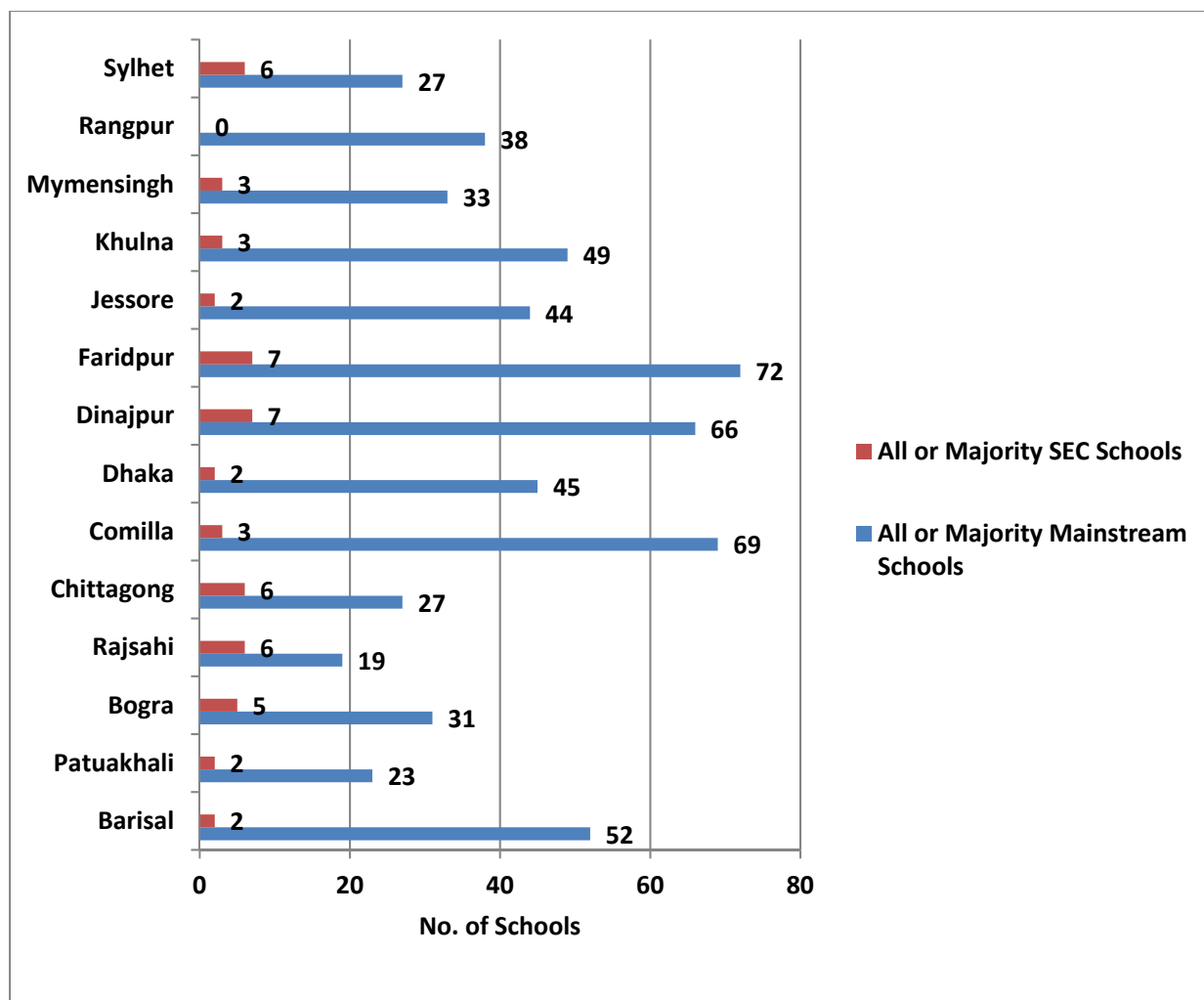


Figure 7: Bar Chart of schools on basis of community population

7. Safeguard measures considered by PEDP-3

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

Hill friendly school design

JARM, 2013 had decided that that hill friendly school buildings will be designed for Chittagong Hill Tracts. LGED initially developed the design of three types of hill-friendly school buildings. In the design for remote areas priority was given to the use of locally available construction materials (e.g. Bamboo, wood and CI sheet) since carrying costs of construction materials could be comparatively high. For the preservation of the surrounding ecosystems around the school building there shall not be any hill cutting and destruction of ecosystem for civil works. LGED arranged three participatory meetings in three Hill Districts to finalise hill friendly design of school building. In the meetings the participants recommended for building which is made mainly of locally available materials. The logic behind suggesting the type is the easily availability of local materials in remote and inaccessible areas. The type shown in Fig. 4 is being constructed now for hilly areas.

Grievance Redress Mechanism

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

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

Schools built on new land

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

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

Indigenous Peoples Safeguard

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

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

school localities and ensured their participation in the civil works selection and implementation processes. Depending on prevalence of Small Ethnic Communities and their needs and concerns – which was assessed through consultations-DPE worked with the following guidelines:

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

8. Conclusion

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

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

APPENDICES

Annex A

SOCIAL SAFEGUARD SCREENING

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

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

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

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

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

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

Positive Negative Neither Positive nor Negative

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

Yes

No

Prepared by (Name and Designation):

.....
(A DPE staff should fill in this form)

Signature: ***Date:***