Social Management Framework (SMF) for the Safety Net System for the Poorest (SNSP) Project



Ministry of Disaster Management and Relief (MODMR)

Government of the People's Republic of Bangladesh

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Social Management Framework for the SNSP

LIST OF ABBREVIATIONS

BBS		Bangladesh Bureau of Statistics
BPD	-	Bangladesh Poverty Database
CBOs	-	Community Based Organization
CHT	-	Chittagong Hill Tracts
DC	-	Deputy Commissioner
DLI	-	Disbursement Linked Indicators
DDM	_	Department of Disaster Management
DRRO	-	District Relief and Rehabilitation Officer
DRKO	-	The Deputy Project Director
EGPP	-	1 0
FFW	-	Employment Generation program for the Poorest Food For Work
	-	Grievance Redress Committee
GRC	-	
GRM	-	Grievance Redress Mechanism
GRO	-	Grievance Redress Officer
HEIS	-	Household expenditure & income survey
HHs	-	Households
IDA	-	International Development Association
LGSP	-	Local Governance Support Project
MIS	-	Management Information System
MPC	-	Main Program Component
MODMR	-	Ministry of Disaster Management & Relief
NSC	-	National Steering Committee
OPD	-	Office of the Project Director
OSC	-	Operational Support Component
PIC	-	Project Implementation Committee
PIOs	-	Project Implementation Officers
PDO	-	Project development objective
PIT	-	project implementation team
RPF	-	Resettlement Policy Framework
SIA	-	Social Impact Assessments
SMF	-	Social Management Framework
SIPP	-	Social Investment Program Project
SMF	-	Social Management Framework
SNSP	-	Safety Net System for the Poorest
SSNPs	-	Social Safety Net Programs
TPPF	-	Tribal Peoples Planning Framework
TPR	-	Technical Project Review
TPs	-	Tribal Peoples
TPP	-	Tribal Peoples' Plan
TR	-	Test Relief
UC	-	Upazila Committee
UNO	-	Upazila Nirbahi Officer
UP	-	Union Parishad
VGF	-	Vulnerable Group Fund
WB	-	World Bank

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Executive Summary

The Department for Disaster Management (DDM), under the Ministry of Disaster Management and Relief (MODMR), implements five of the key safety net programs in the country–Employment Generation Program for the Poorest (EGPP), Food for Works (FFW), Test Relief (TR), Gratuitous Relief (GR) and Vulnerable Group Feeding (VGF). Of these, EGPP, FFW and TR are workfare programs and account for approximately 70 percent of the total safety net allocation to MODMR. These programs operate in rural areas to provide employment to poor laborers to help build and maintain local infrastructure and institutions (mosques, schools, markets, community centres, etc).

The Government of Bangladesh (GOB) has requested follow-on support to the US\$150 million EGPP¹assistance provided by IDA since 2008 to improve the design and implementation of MODMR's programs. The MODMR has prepared this Social Management Framework (SMF) to deal with potential social issues that may arise during implementation of the small scale sub-projects.

The sub-projects to be funded by IDA under the project be identified at the field level will need to comply with the World Bank Operational Policies during the implementation phase as it is not possible to identify the sub-projects' specific social issues upfront during project design and appraisal stage. The SMF provides general policies, guidelines, and procedures to be integrated into the implementation of all sub-projects implemented by DDM under the FFW, TR and EGPP programs. In preparing this document, relevant social safeguard practices were reviewed such as field visits; various levels of consultations; qualitative and quantitative assessment, including compliance with the SMF that had been prepared under EGPP.

The exact locations of the sub-project will be identified by the Union Parishad Project Implementation Committee (UP-PIC) during the selection of projects in consultation with community and ward members during SNSP implementation. The Program will support mainly earthworks as short term employment generation activities of the poorest section of the population. These activities will help the agriculture productivity, better rural communication, protection during natural disasters etc. The sub-projects include: i) canal excavating/re-excavating, ii) earth dam construction/re-construction, iii) rural road construction/re-construction, iii) aran construction/re-construction to address water logging, iv) land filling of community institutions like schools, graveyard, prayer ground etc., v) earthen shelter for animals to project against cyclone, vi) excavation of public ponds/fish firms, vii) organic fertilizer production for agriculture application, viii) further development (height increase) of market/helipad, and ix) water reservoirs construction for rainwater conservation/drinking water. Regardless of the images these activities conjure, they are too small to have any significant impact on the environment. On the social side, they are meant to generate employment and empower the poorest citizens.

Despite the use of the term "earthworks", the vast majority of SNSP sub-projects is extremely small in scale, and will be implemented by poor manual laborers. These are intended to have positive social impacts on the community. Now the program is being implemented in two cycle; 40 days in each cycle with an average of 35-100 workers in each subproject. The scale and scope of sub-projects is expected to remain at the same level and therefore the likely social impact of

¹ Employment Generation Program for the Poorest - IDA Credit No. 4833

the sub-projects is limited from a safeguards standpoint. Furthermore given the small size of investment in each sub-project, it is very unlikely that sub-projects would require triggering other World Bank policies on forestry, dam safety, cultural properties, natural habitats, etc. According to the opinion of the people during field visit, the project will be more effective if the works are integrated, such as; market development by earth filling should include drainage, water supply & sanitation, shed for fish and vegetables, electric supply or Solar panel (small scale) for providing light during night time, access road up to the main road, etc. This will ultimately promote the market as a growth centre within a decade and local people will be more benefited.

Rural road development should incorporate maintaining sufficient slope including turfing and tree plantation alongside the rural road where possible, so that the project will be long lasting and will bring some extra benefit to the local people and beneficiaries.

The overall social impact of the SNSP is expected to be positive. This is also the experience of similar programs such as the Social Investment Program Project (SIPP) and the Local Governance Support Project (LGSP) and Employment Generation Program for the Poorest Project (EGPP). In keeping with the design of SIPP, LGSP and EGPP, community consultation and disclosure will be significant tenets of design and implementation. No private land acquisition will be required for the SNSP. But the land adjacent to the subprojects has been used for collection of soil. In most cases the soil is given by the land owners willingly on voluntary basis. The local UP members & Chairman, Upazila Chairman and other local elites encourage the land owners to share the soil for subproject implementation. Since the nature and scale of the sub-projects will remain the same, no private land acquisition is expected during the period of IDA support. Besides, given the long delays (more than one year) in the land acquisition process under the Acquisition and Requisition of Immovable Property Ordinance 1982 this is not a feasible option for the SNSP where the sub-project preparation time between the identification of schemes and implementation is often very short. In case of using the land for collection of soil the project authority will be sincere not to destroy any standing crops and to disturb crop production in upcoming season. Means, the SNSP will not trigger World Bank OP 4.12 in any case of the subproject implementation. However, in the extreme case that this does happen, this Social Management Framework (SMF) indicates to change the alignment following alternative design option. If not possible, the subproject may be omitted or length/area may be reduced. This is why the SMF does not incorporate resettlement policy framework but includes a Tribal Peoples Planning Framework (TPPF) to address any impacts upon Tribal people who may be residing in the project areas.

Safeguards Approach

No private land acquisition is expected to take place under the Program and overall social impacts are expected to be positive and to help the poorest citizens during times of need. Since most sub-projects will be carried out in rural settings where squatters are not widely found, no major displacement is expected. Due to very large number and nature of sub-projects (up to 37,000 or more) to be implemented within the Project period, the MODMR will use the screening procedures outlined in the SMF to identify, assess, evaluate, mitigate and monitor social impacts of each sub-project. These procedures include the following key points.

• The Project Implementation Officers (PIOs) will be responsible to screen all of their subprojects using a check-list to identify possible social impacts related to either land acquisition resettlement or the presence of Tribal Peoples (TPs) in the project areas;

• No involuntary land acquisition is anticipated under the project. If small quantities of land are at all required for some sub-projects (though this is unlikely), it may be requisitioned on a voluntary basis just to use the soil temporarily. The compensation/ assistance as transitional allowance may be paid for one time crop production. A review of sub-projects implemented under the previous EGPP phases shows that private land acquisition has never been triggered; since the nature and scale of the projects will remain the same as before in SNSP, no land acquisition is expected for this Project. Therefore, World Bank policy on involuntary resettlement is not triggered on grounds of private land acquisition. However, in case private land acquisition becomes necessary, the project authority will find alternative options or change alignment so that land acquisition or displacement will not take place and World Bank OP 4.12 will not trigger. The SMF provides guidelines to comply with the process.

• For this batch of projects as well as those involving impacts on Tribal People, a third-Party audit will be undertaken to assess compliance with the requirements. The PIO will be responsible for carrying out implementation of the SMF. The Bank will review the results of the audits and conduct independent validation and verification on a sample basis.

• Grievance Redress Mechanism is to be established during program implementation for proper execution of the project. The GRM would at two tires; Upazila and District level. The Grievance redress committee (GRC) will hear and resolve cases relating to social and environmental issues raised by any aggrieved persons impacted by the project.

• During the periods of the Project implementation, a "mobile M&E" team will be employed to support capacity building and assist with implementation of safeguards mitigation plans. The M&E team can be staffed with project personnel and/or external consultants to be hired by the MODMR as needed.

1.0 PROJECT BACKGROUND AND INFORMATION

1.1 Background

1. The Department for Disaster Management (DDM), under the Ministry of Disaster Management and Relief (MODMR), implements five of the key safety net programs in the country – Employment Generation Program for the Poorest (EGPP), Food for Works (FFW), Test Relief (TR), Gratuitous Relief (GR) and Vulnerable Group Feeding (VGF). Of these, EGPP, FFW and TR are workfare programs and account for approximately 70 percent of the total safety net allocation to MODMR. These programs operate in rural areas to provide employment to poor laborers to help build and maintain local infrastructure and institutions (mosques, schools, community centres, etc).

2. The Government of Bangladesh (GOB) has requested follow-on support to the US\$150 million EGPP²assistance provided by IDA since 2008 to improve the design and implementation of MODMR's programs. The proposed Safety Nets Systems for the Poorest Project (SNSP) will support a systematic approach to implementation of DDM's five programs while financing short-term employment. The MODMR has prepared this Social Management Framework (SMF) to deal with potential social issues that may arise during implementation of the small scale sub-projects.

1.2 About the Social Management Framework (SMF)

3. Projects and programs financed with IDA resources need to comply with the World Bank Operational Policies and all project components eligible for funding under SNSP will be required to satisfy the World Bank's safeguard policies. The sub-projects to be funded under the project will be identified at the field level during the implementation phase as it is not possible to identify the sub-projects' specific social issues upfront during project design and appraisal stage. The SMF provides general policies, guidelines, and procedures to be integrated into the implementation of all sub-projects implemented by DDM under the FFW, TR and EGPP programs. In preparing this document, relevant social safeguard practices were reviewed, including compliance with the SMF that had been prepared under EGPP. The review included field visits; various levels of consultations; qualitative and quantitative assessment towards understanding implementation processes of social safeguard compliance, and assessment of capacity to comply with safeguard policies.

4. The SNSP is especially for the poorest section of the population. Poverty can be earmarked by income level of the household. The concept of absolute poverty is the minimum level of income that is needed for physical survival. Thus a poverty line can be defined as the minimum level of household income that can be able to purchase a bundle of goods and services to satisfy the basic needs of the households (HEIS 2010).

² Employment Generation Program for the Poorest - IDA Credit No. 4833

2.0 OBJECTIVES OF THE SMF

5. The purpose of the Social Management Framework (SMF) details out the agreed policies, guidelines and procedures to be integrated into the implementation of the three workfare programs under DDM. The main purposes of the SMF are to:

- Understand the process of addressing social concerns in DDM's workfare programs;
- Establish clear procedures and methodologies for the social assessment, review, approval and implementation of sub-projects to be financed under SNSP in order to prevent and/or mitigate any negative social impact of the sub-projects;
- Determine the training, capacity building and technical assistance needed to successfully implement the provisions of the SMF, and
- Provide practical information and resources for implementing the SMF.
- 6. More specifically, the SMF will
 - Outline a framework for social screening procedures and methodologies for the sub-projects to be financed under the project in accordance with GOB and World Bank Safeguard policies/rules,
 - Develop a safeguard policy framework for the Tribal People (TPPF) and
 - Specify appropriate roles and responsibilities and outline the necessary reporting procedures for managing and monitoring social concerns arising from the sub-projects.

7. As a core policy and procedural document for DDM's workfare programs, the SMF is designed for use by:

- DDM Project Staff: As a document enshrining operating principles and guidelines to ensure that sub-projects area adequately assessed and private land acquisition & physical displacement of the households and other entities will not take place
- Union Parishad Project Implementation Committee (UP-PIC): As a document that spells out requirements with respect to social issues that need to be met under SNSP.
- The Union Committee will select the beneficiaries from the poorest section of the villagers based on consensus of the committee members. This is to be taken into account that the total number of the female beneficiaries would be about 30% of the total selected beneficiaries.
- Any grievance received from the people or community will be entertained and resolved as per policy prescribed in this SMF.

3.0 PROJECT DESCRIPTION

7. SNSP is a follow on to the IDA support provided to EGPP and is expected to be a second phase of a long-term programmatic engagement, improving over time the design and implementation of the MODMR's programs. This results-based operation will continue operational support for EGPP as well as technical assistance support to the additional programs – FFW, TR, GR and VGF – in order to allow the MODMR to leverage global good practices in the areas of building targeting, program administration and M&E systems.

3.1 Project Development Objective

8. The Project Development Objective (PDO) is to improve the equity, efficiency and transparency of key social safety net programs to enable the poorest households to better cope with poverty and vulnerability.

9. To meet its objective, the project will focus on achieving results in three areas: (i) improving targeting of program resources to the poorest areas and households to promote more pro-poor coverage; (ii) strengthening program information systems and monitoring capacity to ensure efficient administration, and (iii) strengthening governance and accountability measures for increased transparency.

3.2 Project Components

10. Three components are proposed for this programmatic operation: (i) a results-based Main Program Component (MPC) that aims to support a systematic approach to implementation of EGPP, FFW, TR, GR and VGF while financing short-term employment; (ii) an Operational Support Component (OSC-1) for DDM for project implementation and capacity strengthening, and (iii) an Operational Support Component (OSC-2) for the Bangladesh Bureau of Statistics to develop the Bangladesh Poverty Database (BPD). The MPC will finance cash payments paid under these programs, particularly via EGPP, based on a set of agreed results that are applicable to EGPP, FFW, TR, GR and VGF. The OSCs will finance all inputs like monitoring systems, personnel, IT hardware, motorcycles and computers and consultants, and therefore is a kin to technical assistance windows for DDM and BBS respectively.

11. **Component 1: Main Program Component**: Under this component the project will finance a portion of the consolidated expenditures of the EGPP (from January 2014 – December 2018) to support the innovations to EGPP, FFW, TR, GR and VGF programs though the three results areas based on DLIs. IDA support will be in the form of financing cash transfers, of which EGPP is the only fully cash-based program.

12. **Component 2: Operational Support Component to DDM**: While DDM implements some of the largest safety net programs in the country, it has a very limited budget with which to implement and monitor these programs. The objective of this component is to strengthen DDM's institutional capacity, and thus can be seen as a financing instrument for the inputs needed to meet the DLI targets under component 1. Activities financed under this component include: (i) preparation of the overall Operations Manual based on the revised guidelines for the implementation of the DDM programs (EGPP, FFW, TR, VGF and GR); (ii) development of the specifications for the consolidated program MIS that will include a full set of modules including selection and verification of eligible beneficiaries, registration of selected beneficiaries, payments/transfers, case management, grievances and appeals; (iii) improving program

monitoring at the field level; and (iv) strengthen program management with the help of a consolidated program MIS.

13. **Component 3: Operational Support Component – BBS**: The objective of this component is to support the Bangladesh Bureau of Statistics (BBS) in the development of the Bangladesh Poverty Database (BPD) that will be used to better target the poor in DDM programs, and by other key safety net programs implemented by other Government agencies. The BPD consists of a set of uniform, objective and transparent criteria to select the poor, and is likely to reduce the overall costs and errors associated with targeting. This Database - consisting of roughly 35 million households out of which around 10 million can be expected to be poor- will also help in improving the coordination, efficiency and effectiveness of all social safety nets.

3.3 Project Areas

14. In terms of coverage, these three programs are implemented nationwide targeting the poorest upazilas (sub-districts) of Bangladesh. Currently EGPP allocations at the upazila level is based on the 2005 poverty maps whereby 60 percent of the program allocations are distributed to upazilas with poverty rates of 35 percent or higher; 35 percent of the allocations are made to upazilas with poverty rates between 34 and 21 percent, and 5 percent of the allocations are made to upazilas with poverty rates below 20 percent. Under the project, the allocation formula for EGPP will be updated with the most recent Household Income and Expenditure Survey (HIES) 2010 and the 2011 Population Census and the geographical targeting will be strengthened. Resource allocations for the other programs are disproportionately determined by population and one of the disbursement linked indicators (DLI) under the project will focus on changing the allocation formulate for FFW, TR and VGF such that incrementally they provide a greater weight on poverty rates and thus allocate greater resources to upazilas with larger proportion of poor households.

15. The exact locations of sub-projects are identified by Union Parishad Project Implementation Committees (UP-PIC) in consultation with community and ward members during program implementation.

3.4 Key Sub-Project Interventions

16. As the project will only support cash-based transfers, EGPP sub-projects will be the only interventions supported under SNSP, although every attempt will be made to ensure the other workfare programs (FFW and TR) incorporate good social screening practices as embodied in the SMF.

17. Under EGPP, the project will mainly support earthworks including (i) canal excavating/reexcavating; (ii) earth dam construction/re-construction;(iii) rural road maintenance/re-construction;(iv) drain construction/re-construction to address water logging; (v) land filling of community institutions like schools, graveyard, prayer ground etc.;(vi) earthen shelter for animals to protect against cyclone;(vii) excavation of public ponds/fish farms; (viii) organic fertilizer production for agriculture application; (ix) further development (height increase) of market/helipad, and (x) water reservoirs construction for rainwater conservation/drinking water. 18. The SNSP can be divided under four broad categories: (i) employment generation program (ii) program to cope with natural disasters and other shocks; (iii) incentives provided to parents for their children's education; and (iv) incentives provided to families to improve their health status. The SNSP can also be grouped into two types depending on whether these involve cash transfers or food transfers.

19. SNSP should cover three rather different groups who face various types of shocks and risks. These include: (i) the chronic poor, i.e., those who are poor even during "good times," because they have limited access to assets and income to manage risks and even small reductions in their assets and income can have serious adverse consequences for them; (ii) the transient poor, i.e., those who live close to the poverty line and could fall into poverty when an individual household or the economy as a whole faces hardships; and (iii) other vulnerable population groups for whom general stability and prosperity alone would not be sufficient such as the disabled and divorced/separated/widowed women without access to any regular employment or help from others. Thus, given the types of shocks and risks, it is appropriate that SNSP follows both the "promotion approach" which is undertaken to raise the incomes and employment opportunities of the poor.

20. Under the SNSP a short-term employment has been providing in the form of EGPP to manual workers during the lean season over two cycles (40 days in one cycle) totaling of 80 days in a year. The first cycle runs from September to November providing 40 days of employment and the second cycle runs from March to April providing 40 days of employment. Wages are set below the prevailing market wage (BDT 175/day) for unskilled workers and this contributes to self-selection of the poorest households into the program. Bank support will be to the GOB''s existing program, where IDA will reimburse no more than 70 percent of wage costs.

21. IDA support is envisaged as investment lending to the Government of Bangladesh's existing safety net program of the same name implemented by the Ministry of Disaster Management and Relief, disbursements to the program will be made against a set of results which aim at improving accountability and transparency.

22. Bangladesh has a number of targeted safety net programs that face real challenges in ensuring that the maximum numbers of the poorest households receive benefits. Prior to the implementation of the EGPP and its precursor program there were clear mismatches between the spatial distribution of poverty and program coverage. Social Safety Nets Programs (SSNPs) are generally targeted to the poorest section of the population. According to the HEIS-2010, about 31.5% of the population are poor using the upper poverty line and 17.6% of the people are extreme poor who live below the lower poverty line. Data from HEIS 2010 shows that the highest percentage of the households receiving benefits from the SSNPs are located in Khulna Division (37.30%), followed by Barisal Division (34.43%), Rangpur Division (33.65%), Sylhet Division (18.87%). An independent assessment of the precursor to the EGPP found that while 67 percent of the overall program benefits went to the poor, just above 37 percent of the resources reached the extreme poor (FAO-BRAC 2008).

23. Reaching the poorest is the cornerstone of the SNSP. This includes both the poorest areas and the poorest households. There is a three-fold targeting methodology in the program:

□ *Geographical or area based targeting* based on the poverty map, where the bulk of the resources go to the poorest upazilas.

□Household targeting:

Filter 1: The first filter that will ensure the participation of the poorest is the setting of wages. The current wage of Tk. 175 per day is below the prevailing market wage (Tk.300-400) in most areas, ensuring that only the poorest enroll for the program. The program will ensure that wages are set below the prevailing market wage so that the program is not attractive to the non-poor households.

Filter 2: The second filter is a proxy for household poverty – individuals from those households where the head is a manual laborer and the household has less than $\frac{1}{2}$ acre of land will be eligible;

24. In the poorest areas, it is likely that there may be a larger turnout of potential beneficiaries than there is budget allocation or capacity to implement. Guidelines to deal with such over-subscription will emphasize the importance of equity, participatory and transparent selection of beneficiaries and publicizing the results of the selection. On the other hand, in richer areas or areas where alternative employment is available, there may be lower turnout. These trends will also inform the allocations in successive phases.

Gender targeting: At least 33 percent of the beneficiaries are intended to be women during the course of the project period.

Focus Area 2: Improved governance through clearer rules and enhanced transparency

25. As pointed out earlier, IDA support to SNSP is meant to improve its design and implementation in a way that enhances the governance of Bangladesh''s largest safety net program. Focus Area 2 proposes a set of results that enhance clarity of rules and transparency of implementation.

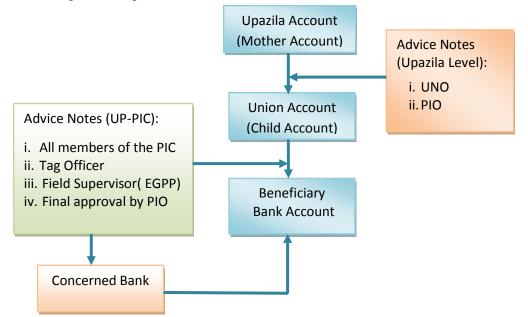
26. *Clarity and accessibility of rules and procedures*: Program rules are currently quite generic and many field level functionaries are unaware of many changes that were made to the rules and procedures. Rules seldom percolate down the chain to the Union Parishad and hardly ever reach the PIC. The project therefore proposes a set of results that require changes to the program document and for the revised rules and procedures to be publicly available all the way down the chain.

27. *Information and public disclosure*: Currently, communities have limited knowledge of the structure and functioning of the program. Evidence from across the world and from the Sirajganj pilot project in Bangladesh indicates that community level notice boards, displaying regularly updated, reliable and correct information, enhance community confidence and participation. Community notice boards will be mandated under the project and to be displayed in public place including Union Parishad Office premise. PICs and Union Committees would also be required to make selection criteria and beneficiary lists publicly available. Adherence to this provision would be monitored through independent third party validations and process assessments conducted under Focus Area 3 of the project.

28. Provision of non-wage costs: Typically, public works programs in Bangladesh do not have a provision for non-wage costs and the SNSP is no exception. Providing for costs associated with the purchase of materials, hardware or skilled labor is central to the quality of infrastructure and governance of the program. Lack of such provision could have several negative impacts. First, it restricts the type of projects to mud-based or "earth" works. Second, if communities are expected to contribute non-wage costs, it affects poorer communities disproportionately. Finally, lack of provision for non-wage costs can create incentives for irregularities, especially when combined with strict monitoring (pressure to deliver the program). In such cases, more "enterprising" PICs may divert wage costs to material costs through the use of "ghost workers". During the project period, guidelines will be issued to earmark up to 20 percent of the cost of each subproject to purchase materials and skilled labor. This is in keeping with global practice. For most infrastructure projects at least 10 percent of the cost would be mandated for materials and other non-wage costs. Disbursement projections have assumed an average of 20 percent for non-wage costs. While IDA will reimburse only wage costs, the inclusion of non-wage costs in the GOB's program will be an important innovation, which will be linked to disbursement.

29. Better system for payment of wages: Another major innovation to be introduced to the program through IDA support concerns the way wages are paid. Currently workers under EGPP are paid by the PIC through account payee cheque for 10 work days. The beneficiaries are selected by the 21-members Union Committee headed by UP Chairman. Other members of the committee are all UP members (12 Nos.), Sub-assistant agriculture officer, concerned Bank Manager, Field Assistant of BRDB, three selected female representatives of the community nominated by UNO, teachers representative nominated by UNO. UP Secretary will play role as member secretary of the committee. The beneficiaries (wage laborers) are selected based on their economic condition, primary occupation of the household head, physical capability and willingness of working as wage labor. All of the selected wage laborers are to open bank account in their names and the PIC, through advice notes, will send payable amount to their respective bank accounts. The Union Parishad level PIC (UP-PIC) has an important role in this respect. The UP-PIC will be consisted of 6 members nominated by the Union Committee of which Project concerned Word Member/female member will be the chairman, Another UP member/ female UP member (In case of male UP member is Chairman), School Teacher of the respective project area, two female representative from the respective project area and one religious leader from the respective community. Any one of the committee member will be acting as the Member Secretary. The local banks are reluctant to open bank account for the wage laborers as they use to withdraw total amount of money from their account just after depositing by the PIC

Chart 1: Payment System



30. If administration and payments are separated, if parties other than the PIC make payments directly to the workers, and if all such transactions are adequately automated, it may significantly reduce fiduciary risk and empower the poorest. Importantly, the project will support development of comprehensive manual covering operations of the bank payments program. Delivery of such a manual will be an important indicator for disbursement of IDA funds for payment of wages. For opening bank account, the beneficiaries are to know writing their names. Reading of the papers and documents can be an added advantage. But in most cases the wage laborers are illiterate or they can just sign their names. They can be brought under literacy program as an integral part of the SNSP.

31. Furthermore, where access to the formal financial mechanisms remains significant challenge (e.g., remote rural areas), and with a view to further the progress of expansion of coverage of the new payment systems, IDA will support a pilot to adapt some innovative payment solutions to the operational needs of the program. The pilots will cover a minimum of three upazilas and will be subject to a rigorous evaluation to fine-tune the proposed solutions, bring awareness about good practices, and promote standards in benefit delivery.

32. **Enhanced capacity at the field level for better supervision**: IDA support to EGPP is fundamentally about strengthening systems of monitoring and implementation. The Government's current capacity is very limited and this creates a potential for malpractice. IDA support to the SNSP therefore provides for field level supervisors in the poorest 334 upazilas. Moreover, upazila level PIOs and the new field level supervisors will be provided with transport in the form of a motorcycle in each of the poorest 334 upazilas. The financing for staff and transportation costs of these supervisors will be done under the Operational Support Component of the project. In addition, while this is not a disbursement indicator, there is a provision for training field supervisors and PIOs. Finally, it is anticipated that the new payment systems will

considerably improve the quality of record-keeping, and thus comprehensively strengthen program monitoring at the field level. For example, by allowing for better directed audits.

- 33. *Grievance redress*: The project will also support the development of an enhanced grievance redress system. The first point where complaints will be accepted is proposed to be the upazila. This is the level of the project closest to the community that is not directly involved in beneficiary selection or wage payments, two common sources of grievances. However, complaints can be resolved at any of the two levels Upazila and district. The grievances would be submitted by the aggrieved person(s) to the Upazila level GRC.
- 34. A feedback loop that includes informing the complainant about the action taken on their complaints, and feeding this information into the implementation of the program, will be a key aspect of the grievance redress system. Any categories of grievances relating to project implementation such as selection of subprojects, selection of wage laborers, wage payment mechanism, using of soil, and other social & environmental issues, etc. will be redressed by the GRC. The grievances should be resolved within 10 days from the date of lodging the complaints at Upazila level. If it is not resolved at Upazila level, the UNO will send the cases with his observation and comments to the District level. The Deputy Commissioner will resolve the cases within 10 days of receiving it from the UNO. Result of the GRC meetings would be communicated to the aggrieved persons in writing. The decision of the GRC should ideally come into consensus failing which the majority decision will be granted.

Focus Area 3: Better Capacity for Monitoring and Evaluation

- 35. IDA support to the program is intended to assist the implementing Ministry in refining their monitoring strategy for the SNSP and would provide support to develop the monitoring capacity of the MODMR at the Union, Upazila, District and at the Central level. The program would support the development of a set of standardized summary indicators and monitoring reports and would provide financing for critical staffing at the central and local levels and investments to introduce a digitized MIS. The details on the proposed investments in this area are provided below-
- 36. *Streamlined data collection and flow:* IDA will support the redesign of existing monitoring forms and reports to facilitate monitoring of inputs, outputs, intermediate outcomes and compliance with program guidelines. Data on a set of streamlined indicators will be collected at the sub-project level. In order to ensure that the data collected is available for real-time decision-making, a number of institutional and technical enhancements will be made under focus area-3 of the program. The program will provide for MIS (in the form of hardware, software, and data entry clerks) at the upazila or district level, as well as connectivity that will allow information to be transferred electronically from the local level directly to the center. The monitoring cell in the Project Director's Office will receive additional support and training. Resources that will allow greater supervision at the sub-project level will also be provided. Providing contract staff and access to transport for PIOs and Tag Officers will further strengthen Monitoring of program implementation at the upazila level (as discussed in Focus Area 2 above).

37. *External Validation*: Independent validation of the program implementation would be conducted in a random sample of approximately three percent of union parishad's each program phase by a firm/individual contracted by the World Bank. The independent third party validations would examine whether program implementation guidelines are followed and whether program benefits reach the intended beneficiaries.

Impact evaluation: The World Bank would partner with a reputable local survey firm to undertake baseline and follow-up surveys of program participants and non-participants in a representative sample of upazilas. This will be funded by the Trust Fund on Environmentally and Socially Sustainable Development, which has been approved. The survey data will be used to examine program targeting and the determinants of program participation, including whether women or individuals from households in the lowest income quintiles are (i) more likely to receive job cards; and (ii) more likely to work under the program. The individual, household, and community characteristics (e.g., literacy, other wage-earning opportunities, social customs, shocks suffered, and distance from the nearest worksite) that influence both the ability to access job cards under the program and the days worked by beneficiaries in the SNSP will also be examined. Program impacts to be examined at the household level include: net household incomes (measured relative to the household's prior year income or relative to otherwise similar non-participant households); responses to lean season vulnerability, including the use of coping strategies such as borrowing, migration, or reductions in the number and quality of meals eaten per day; changes in household assets, especially in relation to possible distress sales, and impacts of the program on human capital through children's school enrolment and household health spending. The survey data will be merged with administrative data detailing the extent and types of workfare activities in the upazilas where households were surveyed. Program targeting performance, new payment system efficiency, and the net income gains to participating households will be identified.

- 38. The project interventions would be more effective and the works are to be integrated, such as; market development by earth filling should include drainage, water supply & sanitation, shed for fish and vegetables, electric supply or Solar panel (small scale) for providing light during night time, access road up to the main road to facilitate carrying of goods, etc. This will ultimately promote the market as a growth centre within a decade and local people will be more benefited.
- 39. Rural road development should incorporate maintaining sufficient slope including turfing and tree plantation alongside the rural road where possible, so that the project will be long lasting and will bring some extra benefit to the local people and beneficiaries.
- 40. **Qualitative assessments**: To complement the quantitative work, beneficiary and nonbeneficiary assessments will be conducted. This work would examine how well the program is working, including perceptions of targeting, leakages/corruption, the quality of works produced under the SNSP, the value of the community sub-projects (both to participants and to nonparticipants), and impacts of the program on internal and external migration as well as on social empowerment.

41. The independent assessments (independent third party validations and impact evaluation, including qualitative assessments) under this focus area would not be funded out of the program Operational Support Component (OSC). Funding for the impact evaluation household surveys has been secured from the trust fund, and additional funds and external resources from development partners are currently being sought to finance the independent third party validations and qualitative assessments.

II. Operational Support Component (OSC)

42. **Overall objective**: Provide operational support to the Department of Disaster Management, Ministry of Disaster Management and Relief in delivering SNSP with enhanced efficiency in terms of better targeting, better benefit delivery mechanism, greater transparency and improved monitoring.

43. Specific objectives:

i) Strengthen reporting and monitoring of the *SNSP* operations

ii) Provide training to staff engaged in the *SNSP* to enhance their capacity for targeting beneficiaries and delivering benefits

44. **Expected outputs**:

□ Services of financial management and procurement personnel availed.

□ Services of Field Supervisors availed.

□ Management information system (MIS) established.

□ Transport facility for Field Supervisors provided.

□ Systematic targeting methodology established.

Training for beneficiary targeting and enrolment process provided.

□ A team of Government officials received exposure to global best practices.

The Ministry's overall capacity to deliver quality social protection projects improved.

C. Key Project Interventions as Employment Generation

45. The project will support mainly the earthworks as emergency employment generation activities. These activities will help the agriculture productivity, better rural communication, protection during natural disaster etc. The subprojects include: i) canal excavating/re-excavating, ii) earth dam construction/re-construction, iii) rural road construction/re-construction, iii) drain construction/re-construction to address water logging, iv) land filling of community institutions like schools, play ground, graveyard, prayer ground etc., v) earthen shelter for animals to project against cyclone, vi) excavation of public ponds/fish firms, vii) organic fertilizer production for agriculture application, viii) further development (height increase) of market/helipad, and ix) water reservoirs construction for rainwater conservation/drinking water.

46. Selection of sub-projects will be done through involvement of the local people and beneficiaries during a ward level planning meeting and will be based on the local demand/need. The ward members will prepare a list of proposed sub-projects to be undertaken for the ward in

consultation with local people including women following the selection criteria laid down in the guidelines issued by the DDM – MODMR. A ward-wise priority list of projects will be submitted to the Union Committee along with records of the proceedings, discussions and decision of the ward level Planning Meeting. On the recommendations of the Union Committee, the Upazila Committee will approve the projects and send the same to the Deputy Commissioner (DC) and the Office of the Project Director (OPD) for formal approval. On receipt of the approval from the DC and OPD, the Upazila Committee will issue an order to the respective Union Committee for the implementation of projects.

4.0 SURVEYS AND DOCUMENTATION

4.1 Preliminary Screening

47. During the identification and preliminary stages of any sub-project preparation, the PIO along with the Upazila Project Implementation Committee (hereafter called Implementing Agency) will fill up social screening check-lists designed for the project. A list of some criteria that will need to be filled up for eligibility (called Negative List) is attached in Annex-A. A preliminary Assessment to identify the types, degree and scale of potential social impacts of the sub-project will be undertaken via the check-lists (**attached in Annex-B**). If the sub-project eventually require land acquisition and/or physical displacement of households/people, the project authority will take initiative to avoid land acquisition and displacement by introducing alternative design option or changing the location/alignment of the subproject by consulting the local people and key stakeholders. It is expected that the World Bank OP 4.12 will not trigger in any of the subprojects under SNSP. Usually it is seen that the sub-projects do not require land acquisition and displacement due to it's nature.

4.2 Project Preparation

48. It is understood that given the short time allowed between the identification of schemes and the actual implementation of those, the preparation time for sub-projects will be minimal. Given the above time constraints, there will not be enough time to conduct a full scale Social Impact Assessment (SIA) for each sub-project. However where the check-lists demonstrate that land acquisition is required and/or displacement of squatters is expected (on public lands, or on private lands) the implementation agency will prepare a brief report on potential impacts and submit it to the Project Director. The project authority will try to avoid land acquisition and displacement considering nature and allocated time line for each of the sub-projects as the land acquisition is a cumbersome process and will take long time to implement the RAP.

5.0 PUBLIC CONSULTATION AND PARTICIPATION

49. Public consultation is the cornerstone of all SNSP activities. As such, the local people of the subproject area will be consulted during selection process and implementation of the subprojects. The implementing agency will carry out continued consultation with and information dissemination to the key stakeholders regarding:

□ The relevant details of the project;

□ The various degrees of project impact;

 \Box Benefits of the project

 \Box Roles and responsibilities of the project authority, local government institutions and community people in selection and implementation process of the subproject

□ Implementation schedule with a tentative timetable of the sub-project

□ Detailed explanation of the grievance redress mechanism.

50. The implementing agency shall enlist the community leaders and other influential community people for encouraging the land owners in the selected sub-projects area to provide soil for road maintenance and other earthen work of the sub-project. The PIO, Field Supervisor and the UP Chairman and Member should ensure that the standing crops are not damaged due to collection of soil or any residential, commercial or common/community properties are not affected due to the project interventions. Tribal People are to be consulted about their social custom, occupational preference, social hierarchy, role of the Headman and Karbari in the society, etc. The Headman and Karbari of the Tribal community must be consulted regarding selection of the subproject and beneficiary from the Tribal community. The consultation meeting would be held with issuing prior notice to the community people by the PIO or UP Chairman. The community people will have to participate in the decision making process of the sub-project selection and implementation.

6.0 TRIBAL PEOPLES PLANNING FRAMEWORK FOR SNSP

51. Since the safety net system for the poorest (SNSP) project will be implemented nation-wide, and since the exact locations of all of the sub-project schemes are not determined as yet, the possibility that the project impact on the Tribal Peoples (TPs) cannot be discounted.

6.1 Objectives of Tribal Peoples Plan

52. The main objectives of the Tribal Peoples Plan (TPP) are to ensure that the activities funded under SNSP do not adversely affect TPs, and that they receive culturally compatible social and economic benefits. This will require the institutes to carefully screen all proposed activities to determine presence of TPs in the locality and ensure informed direct participation of the TPs in the activities.

6.2 Identifying the Tribal Peoples

53. The largest proportion of the country's Tribal population lives in Bandarban, Rangamati and Khagrachari in the Chittagong Hill Tracts (CHT). Some schemes may be selected in these areas under SNSP. In varying proportions, Tribal Peoples (TPs) also live in almost all districts outside of CHT, most notably in those in the north-west and north-eastern regions. However, the various activities that will be undertaken with the project funds should have the same beneficial impacts on TPs and non-TPs.

54. Although the TPs of Bangladesh are well recognized locally, the PIO will examine the following characteristics to make formal identification:

 \Box Self-identification as members of a distinct Tribal cultural group and recognition of this identity by others;

□ Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;

 \Box Customary cultural, economic, social or political institutions that are separate from those of the dominant society and culture; and

□ A Tribal language, often different from the official language of the country or region.

6.3 Basic Principles

55. To avoid or minimize adverse impacts and, at the same time, ensure benefits for TPs, the PIOs will apply the following basic principles in selection and design of particular activity:

 \Box Ensure that TP communities in general and their organizations are not excluded by any means in activities selection, design and implementation processes.

 \Box Together with TPs, carefully screen the activities for a preliminary understanding of the nature and magnitude of potential impacts, and explore alternatives to avoid or minimize any adverse impacts.

 \Box Where alternatives are infeasible and adverse impacts on TPs are unavoidable, the PIOs together with TPs and others knowledgeable of TP culture and concerns, will immediately make an assessment of the key impact issues.

□ The PIOs will undertake the necessary tasks in order to adopt appropriate mitigation measures. The most important in this respect is intensive consultation with the TP communities, community elders/ leaders, formal and informal TP organizations, civil society organizations like NGOs, and others who are interested in and have knowledge of TP issues.

6.4 Identifying TP Social Concerns

56. Impacts on TPs will vary in terms of activities and their scopes, presence and size of TP population in the institution locales, as well as the magnitude of potential adverse impacts and social risks. To the extent applicable for a particular activity, information on the cultural and socioeconomic characteristics and potential vulnerability will be used to identify the TP social concerns and adopt alternative mitigation measures.

6.5 Impact Mitigation & Development Measures

57. The PIOs will explore, together with the TP communities, the possibilities of reinforcing any existing and promoting new culturally compatible development activities/measures that will benefit the TPs. Such measures may include providing credits where TPs are found to engage in production of marketable goods; small-scale horticulture and orchards (in CHT, e.g.); basic water supply and sanitation facilities; and those, such as schools, that could also be used by the communities as a whole.

6.6 TP Consultation Strategy

58. As required for informed consultation, concerned institutes will provide TPs with all activityrelated information, including that on potential adverse impacts. To facilitate consultation the institution will,

 \Box Prepare a time-table for dialogues during sup-project selection, design and implementation processes, and consult them in manners so that they can express their views and preferences freely.

□ In addition to the communities in general, consult TP organizations, community elders/leaders and others with adequate gender and generational representation; and civil society organizations like NGOs and groups knowledgeable of TP issues.

59. Consultation will include the activity objectives and scope; the likely key adverse impacts on (and benefits for) TPs; TPs' own perception of the impacts and feedback; and a preliminary assessment of economic opportunities which the MODMR could promote – in addition to mitigation of the adverse impacts.

60. Consultation will in general concentrate on the adverse impacts perceived by the TPs and the probable (and feasible) mitigation measures, as well as exploring additional development activities that could be promoted under the project. The PIO office will keep Minutes of these consultation meetings in the activity files and make them available for inspection by World Bank and senior GOB officials and other interested groups and persons.

61. If the presence of TP is identified in the sub-project area, then a Tribal Peoples Plan (TPP) will be prepared based on free, prior, informed consent. This will serve as the basis for sub-project implementation and monitoring.

6.7 Major Impact Areas and Indicators

62. The following major impact areas and indicators are suggested for assessment of TP concerns and social risks.

a) Cultural Characteristics

- □ Relationships with areas where they live -- relating to religious/cultural affinity with the ancestral lands, existence of livelihood opportunities, etc.
- □ Presence of customary social and political organizations characteristics indicating internal organization and cohesion of the communities, and their interaction with those of the non-Tribal population.
- □ Interactions and relationships with other Tribal peoples' groups in the same and other areas.
- □ Presence of TP organizations, like NGOs and CBOs, working with TP development issues, and their relationships with mainstream organizations engaged in community development activities.
- □ Identification of any cultural aspects that are likely to be affected or made vulnerable because of the proposed development works.

b) Settlement Pattern

- □ The extent to which the Tribal settlements are physically separated from those of the non-Tribal peoples, indicating interactions and mutual tolerance between the groups.
- □ Characteristics indicating physical organization of homesteads, and the existing community facilities, such as schools, water supply, etc.
- □ Present distance between the settlements and the participating institute.

c) Economic Characteristics

- □ Prevailing land tenure indicating legal ownership and other arrangements that allow them to reside in and/or cultivate the lands in their areas.
- □ Access to common property resources- prevailing conditions under which they may have been using natural resources like forests, water bodies, and others that are considered important sources of livelihood.
- □ Occupational structure indicating relative importance of household's present economic activities, and the extent to which they might be affected or benefited because of the proposed activity.
- □ Level of market participation engagement in activities that produce marketable goods and services, and how and to what extent market participation would be affected or enhanced.

7.0 INSTITUTIONAL ARRANGEMENTS

63. The Project will be implemented by the Department of Disaster Management (DDM) of the Ministry of Disaster Management and Relief (MODMR) with the support of a project implementation team (PIT) led by a full-time Project Director. One full-time Deputy Project Director will assist the PD in the implementation of the Project not below the rank of Joint Secretary. The Project Director will be responsible for overall management of the Project, providing guidance in planning, implementation, operation, monitoring and supervision. He will be assisted by the Deputy Project Director who will be responsible for field supervision and coordination, administration, finance and monitoring. Field Supervisors and the support staff will be working under the project. A focal point, with experience in social management issues and in dealing with TP issues will be designated to provide training to PIOs and to help the PD's Office review and clear social and environmental screening report. In addition the mobile M&E team will be staffed with project people/external staff with expertise in the above areas, to provide guidance during implementation and ensure compliance with the social management framework (SMF).

The institutional framework of the EGPP from the national to grassroots levels will be as under:

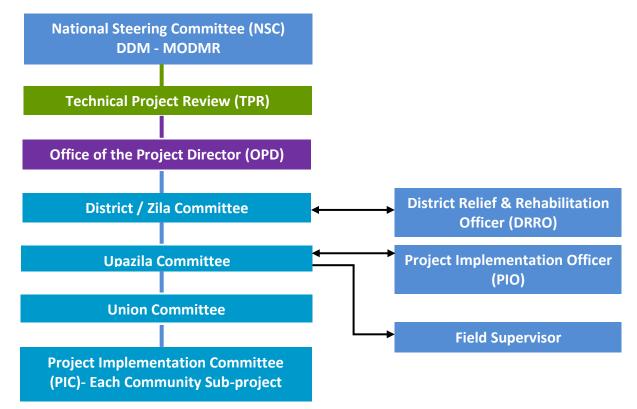


Chart-2: Institutional Framework

64. The PD will be advised, guided and supervised by a National Steering Committee (NSC) headed by the Secretary DDM. The NSC will provide policy advice and oversight for the effective implementation of the Project. Implementation of the Project will be further assisted by

a Technical Project Review (TPR) Committee headed by the Project Director to oversee overall project implementation as per the GOB and World Bank rules and regulations. The Project Implementation Officer (PIO) of every Upazila will be the focal point for the implementation of the project at the Upazila level and s/he will be assisted by a Field Supervisor hired on a contractual basis by the Project.

7.1 Institutional & Management Structure at Central Level

65. At the national level, the oversight and program management will be undertaken by the three major bodies including (i) National Steering Committee (NSC) headed by the Secretary, DDM – MODMR; (ii) Technical Project Review (TPR) Committee headed by the Project Director of SNSP; and (iii) Office of the Project Director (OPD) also lead by the Project Director of SNSP.

7.2 Institutional & Management Structure at District Level

66. At the district level, the program oversight and management will be coordinated by the concerned Deputy Commissioner (DC) with the support of the District Relief & Rehabilitation Officer (DRRO). A District Committee will be set up in each district under the chairpersonship of the concerned DC and the DRRO of the district will act as the Member Secretary of the committee.

7.3 Institutional & Management Structure at Upazila Level

67. Upazila will be the focal point for the overall implementation and oversight for the SNSP. In every Upazila, the oversight and program management of snsp will be undertaken by the Upazila Committee (UC). The Project Implementation Officer (PIO) of every Upazila will be the focal point for the implementation of the project at the Upazila level and s/he will be assisted by a Field Supervisor hired on a contractual basis by the Project. The roles and responsibilities and composition of the upazila committee will be as follows:

7.3.1 Upazila Committee (UC):

68. The Upazila Committee (UC) in every Upazila will function under the chairmanship of the concerned Upazila Nirbahi Officer (UNO) and the PIO of the respective Upazila will act as the Member Secretary to the UC. The Upazila Committee will be responsible for:

- Finalization and approval of the Union Plans containing projects and list of beneficiaries submitted by the Union Committees;
- Selection of a Bank at Upazilla level to open Upazila "Mother Account" and Union level self collection Bank Account "Child Account" for facilitating beneficiary payments;
- Supervise the process of beneficiary account opening in the selected Bank in accordance with the Bangladesh Bank s;
- Overall program implementation and supervision & monitoring of all community subprojects within stipulated time;

- Review technical issues during the implementation of the program and ensure the proper utilization of fund;
- Liaison with the Office of the Project Director (OPD) and Union Committees;
- Liaison with line departments and other public institution and offices at the upazila / union levels for sending work proposal concerning their institutions / offices;
- Support PIO and Union Committee with necessary technical inputs;
- Timely transfer of funds from the Upazila level joint bank account "Mother Account" to the union level self collection account "Child Account" for ensuring timely wage payments to the beneficiaries;
- Prepare and forward Upazila level monthly progress reports to DC and OPD, during the working seasons;
- Ensure public disclosure of adopted projects by taking steps to publish and disseminate a brief list of adopted projects at Zilla and Upazilla level;
- Review and examine recommendations of the Union Parishads / concerned government officers and take necessary action;
- Register and deal with all complaints / grievances within stipulated time;
- Any other tasks assigned by Zilla Committee and OPD from time to time.

69. The UC will compile and submit (via the UNO) its Upazila Plan to the Deputy Commissioner (DC) and the OPD for formal approval. The Upzila Plan will contain union-wise details of planned projects and beneficiaries for each phase of the project. In the event that no comments are received from the DC within 15 days, the UC will assume that its phase-wise plan / budget have been formally approved.

70. Broadly, the composition of the Upazila Committee (UC) will be as per the table given below. However, with the aim to facilitate regular meetings a decision making, a quorum of ten members will be mandatory including the Chairman and the Member Secretary of the Committee. Besides, the UC will have powers to co-opt more members from the upazila, if necessary.

1.	Upazila Nirbahi Officer (UNO)	Chairman
2.	Member of Parliament (MP) of respective parliamentary constituency	Chief Advisor
3.	Upazila Chairman	Advisor
4.	Upazila Vice Chairman	Member
5.	Chairmen of all Union Parishads (UPs) of the respective Upazila	Member
6.	Upazila Health and Family Planning Officer	Member
7.	Upazila Engineer LGED	Member
8.	Upazila Women Affairs Officer	Member
9.	Upazila Education Officer	Member
10.	Upazila Agricultural Officer	Member
11.	Upazila Cooperative Officer	Member
12.	Upazila Livestock Officer	Member
13.	Upazila Fisheries Officer	Member
14.	Upazila Social Welfare Officer	Member
15.	Ansar and VDP officer	Member

16.	Upazila BRDB Officer	Member
17.	Eminent persons of the Upazila (Selected by the Deputy	Member
	Commissioner)	
18.	one teacher (Selected by the Deputy Commissioner)	Member
19.	one representative from the voluntary organization (Selected by the	Member
	Deputy Commissioner)	
20.	Project Implementation Officer (PIO)	Member
		Secretary

7.3.2 Roles & responsibilities of Upazila level key officials

71. The roles and responsibilities of the Upazila level key officials will be as under:

(i) Upazila Nirbahi Officer (UNO): The UNO of all concerned upazilas will be the nodal officer responsible for the overall implementation, supervision and monitoring of the programs under SNSP in their respective Upazila. Specifically, each UNO will be responsible for the following task with the assistance of the Project Implementation Officer (PIO) and the Field Supervisor:

- Facilitate the overall implementation and supervision of the program at the upazila level;
- Act as the Chairman of the Upazila Committee;
- Ensure timely transfer of funds to the Union Committees through Upazila level Bank Account "Mother Account" jointly operated with the PIO;
- Act as Grievance Redress Officer at the Upazila level;
- Liaison with the Deputy Commissioner (DC) and the Office of the Project Director (OPD) on all relevant matters concerning SNSP;
- Facilitate inter-departmental coordination and convergence at the upazila level for efficient execution of program;
- Any other relevant tasks assigned by the DC and OPD.

(ii) Project Implementation Officer (PIO): On behalf of the DDM – MODMR, the PIO of every Upazila will be the focal point for the implementation of the project at the Upazila level and he will be assisted by a Field Supervisor hired on a contractual basis by the Project. In particular, the PIO will be responsible for:

- Facilitating the overall implementation of the program at the upazila level;
- Supporting upazila and union-level public administration in efficiently executing the program;
- Coordinating regularly with the head of local administration and relevant government officials at the Upazila and Union levels;
- Liaising with all the Union Committees under the respective Upazila for effective implementation of the program;
- Ensuring timely transfer of funds to the Union level "Child Account" from the Upazila level "Mother Account";
- Participating in local-level meetings where program maters are discussed;

- Reviewing the environmental and social screening, suggest any required mitigation measures and prevent activities with significant negative impact from being included in the Union / Upazila Plan
- Pre and post work estimation / measurement of each community sub-project;
- Monitoring and supervising programs under SNSP and public workfare schemes implemented by DDM MODMR at the Upazila level;
- Preparing and submitting all assigned reports from the local-level on a regular basis;
- Acting as the Member Secretary to the Upazila Committee as well as maintaining all records of proceedings of the Upazila Committee; and
- Assisting the Upazila Nirbahi Officer (UNO) with all tasks related to the program.

(iii) Field Supervisors: In each of the 334 Upazilas with the highest poverty rate, a Field Supervisor is to be hired on the contractual basis for the project period. The Field Supervisor will work closely with the PIO of the respective Upazila and will be responsible for:

- Assisting in the overall implementation process of the program at the upazila level;
- Supporting in regularly coordination with the Chairperson / Member Secretary of the Union Committees and relevant government officials in every Union Parishad;
- Conducting and facilitating the targeting and enrolment processes in the assigned location;
- Facilitating environmental and social screening of community sub-projects by supporting the Union Committees of the Upazila;
- Assisting PIO in carrying out pre and post work estimation / measurement of selected community sub-projects;
- Assisting in regular monitoring and supervision of the programs under SNSP and other public workfare schemes at the Upazila level;
- Maintaining and updating Union wise / Upazila level muster roll of all the selected beneficiaries on regular basis;
- Supporting compilation of reports from the local-level on a regular basis and support preparation of Union / Upazila level periodic reports; and
- Assisting the Program Implementation Officer (PIO) with other relevant tasks, as requested

In the Upazila where the post of PIO is vacant, the Field Supervisor will be responsible for managing both sets of tasks until the regular PIO is appointed by the Government.

7.4 Institutional & Management Structure at Union and Project levels

72. At the Union Parishad level, the oversight and program management will be undertaken by the Union Committee headed by the Chairman of the respective Union Parishad. Every Union Committee will have powers to constitute project-specific Project Implementation Committees (PICs) for the effective implementation and supervision of the community sub-projects. The roles and responsibilities and composition of the Union committee and PICs will be as follows:

7.4.1 Union Committee

73. Each Union will have a Union Committee headed by the Chairman of the Union Parishad (UP) and the UP Secretary will act as its Member Secretary. The Union Committee will be responsible for:

- Selection of all projects and beneficiaries in consultation with the community and the ward members on the basis of the eligibility criteria and policy directions communicated by the Upazila Committee;
- Preparation of a Union Plan on the basis of final list of the selected community subprojects and beneficiaries and send the same to the Upazila Committee for the approval;
- Ensure opening of a beneficiary Bank Account for selected laborers in a scheduled government bank situated in union/Upazilla level and ensure wage payment to each beneficiaries through the bank accounts;
- Maintenance of the approved beneficiary list;
- Preparation and regular updating of the beneficiary muster roll;
- Conducting environmental and social assessment of projects;
- Undertake periodic supervision of projects;
- Liaison with the Upazila Committee and OPD;
- Maintenance of all necessary records including site registers, registration/ job cards, receipts & payment, etc. with the help of the PICs;
- Coordinate with the PICs for ensuring timely reporting including data collection and preparation of activity / progress reports; and
- Any other tasks assigned by the Upazilla / Zilla Committee from time to time.

74. The Union Committee will compile its Union Plan on the basis of list of projects and beneficiaries received from each ward and submit the same to the Upazila Committee (UC) for approval and necessary action. The Union Plan will contain ward-wise details of planned projects and beneficiaries for each phase of the project. A Union Committee will be formed in each UP in a community meeting in the presence of UP Chairman, UP members and with community participation from all wards organized by UP. In choosing Union Committee members, the following principles will be respected:

75. The members of the Union Committee should be residents of the Ward (or village) that benefits most directly from the proposed investment. Every effort should be made to ensure that the representatives (at least two in every Committee) of beneficiary communities are included in the Union Committees – as this maximizes local ownership and increases accountability; At least two members of the Union Committee shall be women.

76. Broadly, the composition of the Union Committee will be as per the table given below. Besides, the Union Committee will have powers to co-opt more members from the union parishad, if necessary.

1.	UP Chairman	Chairman
2.	All members of the UP	Chief Advisor
3.	Sub-assistant Agricultural Officer (Block Supervisor)	Advisor
4.	One representative from LGED	Member
5.	Field Assistant, BRDB	Member
6.	one eminent person from each ward of the union (Selected by UNO)	Member
7.	One teacher from the union (Selected by UNO)	Member
8.	One women representative from the union (Selected by UNO)	Member
9.	Representative of the voluntary organization from the union (Selected	Member
	by UNO)	
10.	Representative from the Water Development Board (Where	Member
	necessary)	
11.	UP Secretary	Member
		Secretary

7.4.2 Project Implementation Committee (PIC):

77. Every Union Committee may form Project Implementation Committees (PICs) consisting of 5-7 members for each project. Each PIC will be responsible for:

- Ensuring day to day implementation of the projects in close collaboration with the Union Committee;
- Ensuring timely payment to the beneficiaries in consultation with the Union Committee and concerned scheduled bank;
- Liaisoning with the Union Committee;
- Maintaining of all necessary records including site registers, registration/ job cards, receipts & payment, etc.;
- Ensuring day to day reporting including data collection; and
- Preparing activity / progress reports of the concerned project and submitting the same to the Union Committee.

78. A Project implementation Committee (PIC) will be formed in a community meeting in the presence of UP Chairman, UP members and with community participation from all wards organized by Union Parishad. The members of the PIC should be residents of the Ward (or village) that benefits most directly from the proposed project. The following principles will be respected in the process of selection and functioning:

- A person will not hold the position of the Chair in more than one PIC;
- Ideally, 30% of the members of PIC may be women.

79. A concerned ward member or women ward member will be selected as the Chairperson of PIC by majority vote during this meeting. Other members of the PIC will be nominated by the community at ward level open meeting organized by the ward members. One school teacher and an eminent person from the locality shall be the committee members in addition to the local ward members. One member nominated by the committee will act as the Member-Secretary.

80. The SMF will be followed by the PIO and his team under the supervision of the Social Management Specialist hired to assist the PD"s Office as well as train the PIOs. The PIO"s team will have to be staffed with project personnel who have requisite abilities to: apply the check-list and assess next steps required to comply with the SMF, conduct surveys required for social screening, conduct effective consultations, write the report on social screening in cases of all subprojects irrespective of nature and location of the subprojects.

81. The Project Director will be responsible for oversight and ensuring overall compliance with National and WB procedures associated with land acquisition, displacement, and resettlement and rehabilitation. The PD's Office will ensure, in consultation with the PIO's office that no land acquisition and physical displacement will take place due to the subproject interventions. At the Upazila level, the Upazila Committee (UC) headed by the Upazila Nirbahi Officer (UNO) will be responsible for the implementation and supervision of the Project, while at the Union Parishad (UP) level, the Union Committee headed by UP Chairman will have the same responsibility for implementation and supervision of the Project. Union Committees may form Project Implementation Committees (PICs) for each community project, which will be responsible for day to day implementation of the community sub-projects in close collaboration with the Union Committee.

8.0 GRIEVANCE REDRESS MECHANISM

82. Despite best efforts to avoid or minimize adverse impacts on the people or community during selection and implementation of the sub-projects, there are always a few unsatisfied citizens. The implementing agency will make efforts at project level to resolve grievances through negotiations *involving community leaders and people's representatives*. In case dispute is not resolved at local level, the matter will be placed before a Grievance Redress Committee to be established at the Upazila level.

83. The Grievance Redress Committee (GRC) shall be in two tiers to be constituted with a panel of five Members at the first tier (Upazila level) and two members at second tier (District level). The GRC will be constituted by the Ministry of Disaster Management and Relief through an official notification. The grievances are to be resolved at local level within 10 days of lodging the complaints and the district level GRC will resolve the cases within maximum 10 days from the date of receiving letter from the UNO.

Upazila level,

- i. Upazila Nirbahi Officer (UNO) will be Grievance Redress Officer (GRO)
- ii. Project Implementation Officer (PIO) as member secretary of the GRC
- iii. Concerned UP Chairman will be the member
- iv. A representative from the residents of the project area, who would be publicly known to be a person of integrity, good judgment and commands respect, and
- v. A female representative from the local resident to be selected by the UP Chairman in consultation with the GRO (UNO).

At the district level,

- i. Deputy Commissioner (DC) will play role as GRO
- ii. The District Relief and Rehabilitation Officer (DRRO) will play role member secretary

84. The Upazila level GRC members will do screening of the grievances and will only entertain the cases if it is directly related to the project. If the case is under arbitration or court of law, the GRC will refer the case to the DC office through the Project Director for resolving as per law. The local level GRC members will visit the field (if required) for making decision. The GRC sessions will be held in presence of the aggrieved persons at GRO office or at the concerned UP office, as decided by the committee. The GRO will inform the aggrieved persons about the decision of the GRC in writing. If the grievance is not resolved at Upazila level, the GRO will forward it to the DC (district level GRO) with observation and comments for resolution.

All of the grievances accepted by the GRCs are to be approved by the Project Director.

- 85. The first tier GRC, shall:
- □ Convene meetings of the committee as necessary at such place or places in the project area as he considers appropriate; and

- □ Conduct the proceedings in an informal manner as he considers appropriate with the object to bring an amicable settlement between the parties;
- □ The GRC would resolve the issues within 10 days from the date of lodging the complaints.
- □ The decision of the GRC would communicate with the aggrieved persons in writing
- □ If the grievance is not resolved at first tier, the GRO will send the case to the district level with observation and comments The decision taken during negotiations and GRC meetings shall be formally recorded for future reference and presentation in the court, if necessary.

86. All expenses incurred in arranging grievance negotiations and meetings of GRC as well as logistics required, shall be arranged by project-executing agency. These will be part of the project's administrative expenses.

87. <u>*Right of Complaint*</u>: The aggrieved person/community, if not satisfied with the decision of Grievance Redress Committee, has the right to refer his / her petition to court of law.

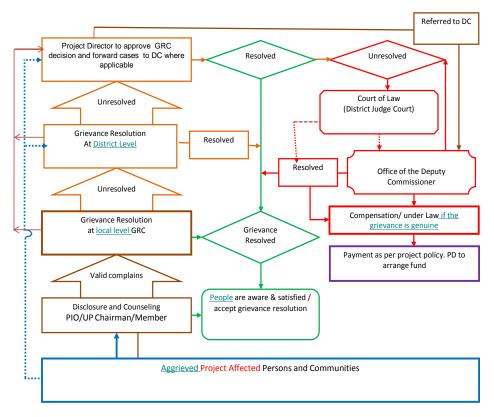


Chart-3: Grievance Redress Mechanism

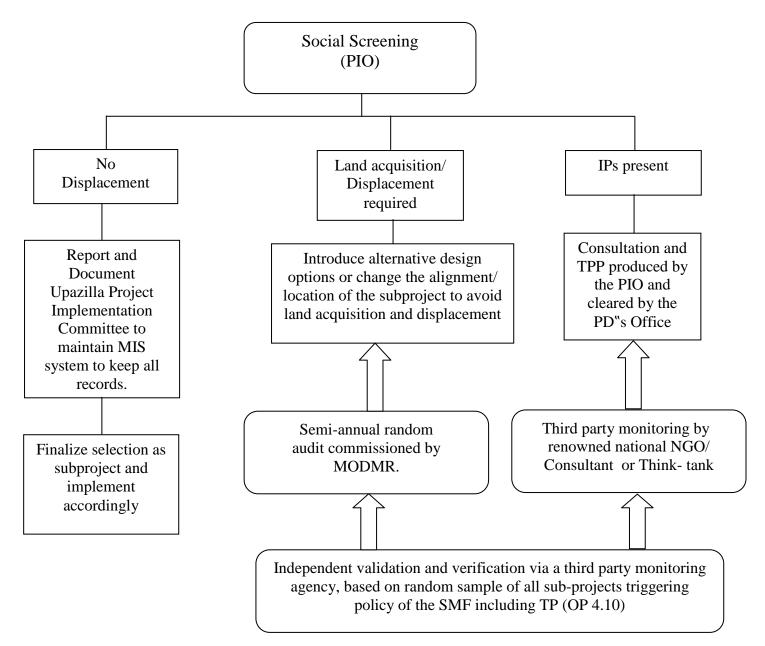
9.0 MONITORING AND EVALUATION

88. For projects will require no private land or that only require temporary using of soil from nearby land plots for maintenance of the road or land filling in any social/educational/religious institutions. People are willingly offering soil for the project implementation. In some time people give specific land plots with a view to digging a pond. In this case both parties will be benefited by the project. The project authority, especially PIO and Field Supervisor through the UP Chairman, Member and local elites will try to find out such land plots and encourage people to offer soil for sub-project implementation. PIOs will be responsible to ensure compliance with the Bank policies. A semi-annual random audit will be performed on this batch of sub-projects to ensure compliance, (detailed ToRs in Annex C). The results of the audit will be shared with the Bank on a yearly basis. The Bank will sponsor a validation and verification study by a third party monitoring agency via a random sample based audit of sub projects to ensure compliance with the policies and procedures incorporated in the SMF.

89. For sub-projects that may trigger land acquisition and/or physical displacement of the households or other entities, the PIOs along with the concerned UP Chairman and Member will avoid or minimize the impacts by choosing alternative design options and or changing the alignment. Initially a social screening would be carried out by PIOs and Upazila Project Implementation Committee to select each of the subprojects. Land acquisition and resettlement would be avoided during selection process of the subprojects. The screening reports would be cleared by the PD's Office. A third party audit will be undertaken for a sample of such subprojects and those involving impacts on TPs, by a renowned national NGO/think-tank with the requirements of the SMF. These results will be shared with the Bank upon completion. The Bank will conduct independent validation and verification based on a random sample of projects whether triggering land acquisition and/or displacement, via a third party monitoring agency.

90. During the periods of the employment generation scheme implementation, a "mobile M&E" team will be employed to support capacity building and assist with implementation of safeguards mitigation plans. The M&E team can be staffed with project personnel and/or external consultants as needed.

Chart-3: Social screening and monitoring



10. 0 COST AND BUDGETING

91. Funds for social screening, preparation of social management framework, compensation for adverse affects (if any) due to GRC, etc. will be provided by the implementing agency. The latter will also provide for all costs related to mitigating adverse social impacts, third party independent monitoring based on budgetary requirements established in the SMF. All of these costs are to be a part of the total project cost. A sum of the budget will need to be allocated for the social management, mitigating adverse impacts and other associated costs relating to implementation of the Safety Net System for the Poorest Project as per this social management framework.

11.0 DISCLOSURE

92. The SMF will be made available for public consultation by the executing agency, with key portions translated in Bengali, on their official website as well as at places accessible to the people impacted/benefited by the project and members of civil society (Schools, Libraries, Union Parishad Offices etc.). Advertisements will be published in both English and Bengali Dailies announcing the disclosure of the documents and the appropriate websites and localities where they can be found for public comments.

93. Once all comments have been addressed, the Bank will disclose the document publicly. After the Bank finally approves the document the executing agency will once again make the final version publicly available with key portions translated in Bengali, electronically on their respective websites and place hard-copies in easily accessible places. Information about these locations will be advertised in local newspapers (English and Bengali). Once the project locations are defined and the specific TPPs are in place, these too will be disclosed publicly following the same process.

NEGATIVE LIST

Activities that involve the following characteristics will be ineligible for support under SNSP:

□Poses any direct or indirect discriminatory criteria for selection

□ Affect private land, residential or commercial establishments

□Affect mosques, temples, graveyards, cremation grounds, and other places/objects that are of religious and cultural significance

□May significantly restrict access to common property resources and livelihood activities of groups and communities

Activities that affect <u>Tribal peoples</u> with long-term consequences will be ineligible support. These activities are those that

□Poses possibility of exclusion

□ Affect private land, residential or commercial establishments

□ Threaten cultural tradition and way of life

□May severely restrict access to common property resources and livelihood activities

□May affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds, etc.)

ANNEX-B

SOCIAL SCREENING FORMAT Safety Net System for the Poorest (SNSP)

This form will be filled up by the Upazila Project Implementation Committee along with the community members at Union Level and must be submitted to Project Implementation Officer (PIO) before being selected]

A. General Information

Title of the Subproject:	
Village/Mouza	Upazila:

District:

Screening Date:

B. Project Related Information

B1 Activities of Subproject includes: New construction/ Improvements/ Repair /Renovation (described in brief regarding subproject activities)

.....

.....

B2. Describe existing land use/occupancy of site and surroundings in brief and accordingly draw

a free-hand map (Please use separate sheet)

C. Socio-economic Information

C1 What are the asset(s) that would be affected due to Subproject Interventions? Yes or No \Box Land □ Physical Structure (dwelling or commercial)..... □ Trees/crops..... □ Natural Resources (Water bodies/ Forest/ Public Pond).... □ Community Resource Property..... \Box Others (please specify).... C2 Land

C.2.1 Ownership of Land: Public/Private..... C.2.2 Type Land: Agricultural/ Homestead/ Low Land /Fallow/ Pond of Please specify.....

□ Does the subproject require additional land permanently or on a temporary basis?

□ To except voluntarily donated land what would be the legal procedure?

□ In case of land acquisition, will there be physical and/or economic displacement of people?

C2.3 Is there any **squatter/ encroacher/ leaseholder** residing on public lands? Yes/ No and specify type If yes.

□ What would be the total numbers of Affected Families?

.....

 \Box Is there any possibility of physical displacement?

.....

□ How will their livelihoods be affected? (example: due to loss of shelter and housing structure, loss of income source, loss of grazing field/ social network/ family bondage etc)

.....

□ Do the affected families have school going children? Yes/no If yes,.....how many such children are there?

C3 <u>Structure (Housing/Commercial)</u>

C 3.1 Type and total number of Housing structure that would be affected: (Type : Kachchatemporary structure made by tin/bamboo/ straw etc, semi-pucca- brick made structure with tin at roof and pucca-permanent brick made structure)

.....

C 3.2 Is there any commercial/ business structure that would be affected?

C 3.3 Ownership types of the affected structures: Private/ Leaseholder/squatter/encroacher Please specify.....

C 3.4 Is there any tenant identified using the affected structure? Yes/No

C 4. Trees and Crops

C 4.1 Is there any tree/plant that might be affected? Yes/no...... Total estimated number by size....?

C 4.2 Is there any social forestry /plantation project that would be affected? Yes/no.....

C 4.3 Is there any common fruit bearing tree that would be affected? Yes/i	no
Species	

C 4.4 Any agricultural land included with in the subproject footprint? Yes/no..... If yes, please provide necessary information regarding productivity of land, type and quantity of Crop that might be affected and market value

.....

.....

.....

C6. Is there any Natural Resource that might be affected? Example: Social forest, Beel, Depression area, Grazing field, Wet-land, etc Yes/No..... If yes, please describe regarding dependency on the Affected Resources

C7. Tribal Peoples

C 7.1 Is there any community of Tribal Peoples residing within or adjacent the project site? Yes/No......For how long?

C 7.2 Any Households of Tribal Peoples would be affected? Yes/No..... If yes, how many families would be affected?..... C 7.2 Is there any way that proposed project may pose any threat to cultural tradition and way of life of Tribal Peoples? Yes/No.....

C 8 Beneficiaries

C 8.1 Who are the Beneficiaries? How they would be benefited by the subproject? □ Access to health facilities/services? Yes/No..... □ Better access to schools, education and communication? Yes/No..... □ Project activities would provide income generating source. Yes/No...... Please describe..... □ Shall subproject promote marketing opportunities of the local products? Yes/No..... If yes, would that happen? Please how elaborate □ Are people ready to co-operate with the project? Yes/No..... Please elaborate the reasons C 9 How will the subproject create opportunities for Beneficiaries? 1. Prepared bv (Name): 2. Upazila Project Implementation Committee Name of the Committee Head (UNO): 01. Names of Committee Members participated in Screening 02. 3. Union Project Implementation Committee Name of the Committee Head (Chairman): 01. Names of Committee Members participated in Screening:

TERMS OF REFERENCE FOR ENGAGEMENT OF MONITORING CONSULTANT

SAFETY NET SYSTEM FOR THE POOREST (SNSP) PROJECT

1. Introduction

The Department for Disaster Management (DDM), under the Ministry of Disaster Management and Relief (MODMR), implements five of the key safety net programs in the country–Employment Generation Program for the Poorest (EGPP), Food for Works (FFW), Test Relief (TR), Gratuitous Relief (GR) and Vulnerable Group Feeding (VGF). Of these, EGPP, FFW and TR are workfare programs and account for approximately 70 percent of the total safety net allocation to MODMR. These programs operate in rural areas to provide employment to poor laborers to help build and maintain local infrastructure and institutions (mosques, schools, markets, community centres, etc).

The Government of Bangladesh (GOB) has requested follow-on support to the US\$150 million EGPP³assistance provided by IDA since 2008 to improve the design and implementation of MODMR's programs. The MODMR has prepared this Social Management Framework (SMF) to deal with potential social issues that may arise during implementation of the small scale sub-projects.

2.0 Project Description

SNSP is a follow on to the IDA support provided to EGPP and is expected to be a second phase of a long-term programmatic engagement, improving over time the design and implementation of the MODMR's programs. This results-based operation will continue operational support for EGPP as well as technical assistance support to the additional programs – FFW, TR, GR and VGF – in order to allow the MODMR to leverage global good practices in the areas of building targeting, program administration and M&E systems.

3.0 Project Development Objective

The Project Development Objective (PDO) is to improve the equity, efficiency and transparency of key social safety net programs to enable the poorest households to better cope with poverty and vulnerability.

To meet its objective, the project will focus on achieving results in three areas: (i) improving targeting of program resources to the poorest areas and households to promote more pro-poor coverage; (ii) strengthening program information systems and monitoring capacity to ensure efficient administration, and (iii) strengthening governance and accountability measures for increased transparency.

³ Employment Generation Program for the Poorest - IDA Credit No. 4833

4.0 Project Components

Three components are proposed for this programmatic operation: (i) a results-based Main Program Component (MPC) that aims to support a systematic approach to implementation of EGPP, FFW, TR, GR and VGF while financing short-term employment; (ii) an Operational Support Component (OSC-1) for DDM for project implementation and capacity strengthening, and (iii) an Operational Support Component (OSC-2) for the Bangladesh Bureau of Statistics to develop the Bangladesh Poverty Database (BPD). The MPC will finance cash payments paid under these programs, particularly via EGPP, based on a set of agreed results that are applicable to EGPP, FFW, TR, GR and VGF. The OSCs will finance all inputs like monitoring systems, personnel, IT hardware, motorcycles and computers and consultants, and therefore is a kin to technical assistance windows for DDM and BBS respectively.

Component 1: Main Program Component: Under this component the project will finance a portion of the consolidated expenditures of the EGPP (from January 2014 – December 2018) to support the innovations to EGPP, FFW, TR, GR and VGF programs though the three results areas based on DLIs. IDA support will be in the form of financing cash transfers, of which EGPP is the only fully cash-based program.

Component 2: Operational Support Component to DDM: While DDM implements some of the largest safety net programs in the country, it has a very limited budget with which to implement and monitor these programs. The objective of this component is to strengthen DDM's institutional capacity, and thus can be seen as a financing instrument for the inputs needed to meet the DLI targets under component 1. Activities financed under this component include: (i) preparation of the overall Operations Manual based on the revised guidelines for the implementation of the DDM programs (EGPP, FFW, TR, VGF and GR); (ii) development of the specifications for the consolidated program MIS that will include a full set of modules including selection and verification of eligible beneficiaries, registration of selected beneficiaries, payments/transfers, case management, grievances and appeals; (iii) improving program monitoring at the field level; and (iv) strengthen program management with the help of a consolidated program MIS.

Component 3: Operational Support Component – **BBS**: The objective of this component is to support the Bangladesh Bureau of Statistics (BBS) in the development of the Bangladesh Poverty Database (BPD) that will be used to better target the poor in DDM programs, and by other key safety net programs implemented by other Government agencies. The BPD consists of a set of uniform, objective and transparent criteria to select the poor, and is likely to reduce the overall costs and errors associated with targeting. This Database - consisting of roughly 35 million households out of which around 10 million can be expected to be poor- will also help in improving the coordination, efficiency and effectiveness of all social safety nets.

5. Project Areas

In terms of coverage, these three programs are implemented nationwide targeting the poorest upazilas (sub-districts) of Bangladesh. Currently EGPP allocations at the upazila level is based on the 2005 poverty maps whereby 60 percent of the program allocations are distributed to upazilas with poverty rates of 35 percent or higher; 35 percent of the allocations are made to upazilas with poverty rates between 34 and 21 percent, and 5 percent of the allocations are made to upazilas with poverty rates below 20 percent.

Under the project, the allocation formula for EGPP will be updated with the most recent Household Income and Expenditure Survey (HIES) 2010 and the 2011 Population Census and the geographical targeting will be strengthened. Resource allocations for the other programs are disproportionately determined by population and one of the disbursement linked indicators (DLI) under the project will focus on changing the allocation formulate for FFW, TR and VGF such that incrementally they provide a greater weight on poverty rates and thus allocate greater resources to upazilas with larger proportion of poor households.

6. Expected outputs:

o Services of financial management and procurement personnel availed.

- o Services of Field Supervisors are availed.
- o Digitalized reporting, monitoring and supervision system is established.
- o Transport facility for the Field Supervisors provided.
- o Systematic targeting methodology is established.
- o Training is provided for beneficiary targeting and enrolment process.
- o A team of Government officials will have received exposure to global best practices.
- o The Ministry's overall capacity to deliver quality social protection projects is improved.

Since the location of all of the sub-projects is not known at this stage there is also the possibility of triggering the Bank's Policy (OP 4.10) Tribal Peoples, should the sub-projects be implemented in tribal areas or areas where Tribal people are present. A Tribal People's Planning Framework, is therefore included in the SMF.

7. Safeguards and M&E Approach for the Project

No private land acquisition is expected to take place under the Program. Since most sub-projects will be carried out in rural settings where squatters are not widely found, no major displacement is expected. Due to very large number and nature of sub-projects (up to 37,000 or more) to be implemented within the project period, the MODMR will use the screening procedures outlined in the SMF to identify, assess, evaluate, mitigate and monitor social impacts of each sub-project. These procedures include the following key points.

□ The Project Implementation Officers (PIOs) along with and Upazila Project Implementation Committee will be responsible to screen all of their sub-projects using a check-list to identify possible social impacts related to either land acquisition resettlement or the presence of TPs in the project areas;

 \Box No involuntary land acquisition is anticipated under the project. If small quantities of land are at all required for some sub-projects (though this is unlikely), it may be avoided by changing sub-project design or the land owner may offer the land willingly on a voluntary basis. A review of sub-projects implemented under the previous EGPP programs shows that private land acquisition has never been triggered; since the nature and scale of the projects will remain the same as before, no land acquisition is anticipated for this project. Therefore, World Bank policy on involuntary resettlement is not likely to be triggered on grounds of private land acquisition.

 \Box The Bank will sponsor an independent verification and validation study by a third party monitoring agency via a random audit based on a sample of projects to ensure that adequate safeguards were in place, in line with the provisions of the SMF.

 \Box During the periods of the employment generation scheme implementation, a "mobile M&E" team will be employed to support capacity building and assist with implementation of safeguards mitigation plans. The M&E team can be staffed with project personnel and/or external consultants as needed.

□ Assessments are required to provide information on program implementation, the effectiveness of targeting and the impact of the program on household net incomes and coping strategies in response to shocks. Assessments should include both external validation and an impact assessment based on surveys of beneficiary and non-beneficiary households. External validation would be conducted in a random sample of union parishads each program cycle. The validation exercise would examine whether program implementation guidelines are followed and whether program benefits reach the intended beneficiaries.

□ Qualitative assessments: To complement the quantitative work, beneficiary and nonbeneficiary assessments would be conducted. This work would examine how well the program is working, including perceptions of targeting, of leakages/corruption, the quality of works produced under the SNSP, the value of the infrastructure projects (both to participants and to non-participants), and impacts of the program on internal and external migration as well as on social empowerment.

8. The major objectives of engaging an Independent Monitor are to:

□ Assess the overall approach of project activities

□ Verify results of internal monitoring;

□ Assess whether SMF objectives have been met; specifically, whether livelihoods and living standards of the community people especially the wage laborers worked in the sub-projects have been restored or enhanced;

9. Scope of Work -Specific Tasks

□ Compliance monitoring will cover

(i) adequacy of organizational mechanism for implementing the SMF,

- (ii) restoration of incomes of the beneficiaries,
- (iii) settling complaints and grievances, and
- (iv) Provisions for adequate budgetary support by SNSP for implementing the SMF;

□ The independent consultant will set up a set of baseline indicators reviewing available data and or collecting primary data for monitoring and evaluation, building upon the Projects' own record keeping system. It may also include maps, charts, photographs of the subproject area during preparation of the monitoring report.

Specific tasks of the monitor are to:

a. Establish system of internal monitoring to assess progress in meeting key targets in the project implementation including budget and time frame, consultation, grievance and special issues and benefits.

b. Conduct regular reviews, based on internal monitoring and evaluation reports, involving key stakeholders including people's representatives. Reach consensus on actions required to proper implementation of the subproject.

c. Establish a system for Independent monitoring and evaluation to assess achievement and suitability of project objectives.

d. Establish monitoring and evaluation reporting methods and reporting requirements.

e. Involve local people especially beneficiaries, implementing agency Union Parishad and community in Project monitoring and evaluation using appropriate methods.

f. Include an ex-post evaluation of SMF to be conducted by the independent monitor after completion of the Project.

g. Review lessons learned for social management framework making and planning.

$\hfill\square$ In specific to the Project the independent monitor should perform the following activities

a. Monitor the authenticity of the data and the approach for generation of those.

b. Review justification for changes in SMF and budget.

c. Verify progress and achievement of implementing agency and devise formats for estimating various indicators responsible for achievement of progress.

□ Consultation with Local People, Project Management and other Stakeholders

Formal and informal discussion must be undertaken with key stakeholders for assessing the issues monitoring Project. The main objective of these meetings will be to ensure the participation and generation of compatible views and ideas.

Monitoring Issues	Monitoring Indicators
Budget and Timeframe	 i. Have all staff at different levels as per project formulation been appointed and mobilized for field and office work on schedule? ii. Have all subprojects been identified with adequate screening? iii. Have capacity building and training activities of the project staff been completed on schedule? iv. Are funds for project implementation being allocated in time
Consultation, Grievances and Special Issues	 i. Have consultations taken place as scheduled including meetings, groups, community activities? ii. Have any aggrieved persons submitted grievance to the GRC? What were the outcomes? iii. Have conflicts been resolved?
Benefit Monitoring	 i. What changes have occurred in patterns of occupation compared to the pre-project situation? ii. What changes have occurred in income and expenditure patterns compared to pre-project situation? ii. Have peoples income kept pace with these changes? iii. What changes have occurred for wage laborers involved in project civil works.

10. Potential Monitoring Indicators

10.1 Indicator to monitor Tribal Peoples

□ □ Family Bondage and Social Network

□ □ Social Interaction with those of the non-Tribal population.

□ Interactions and relationships with other Tribal peoples' groups in the same and other areas.

 \Box \Box Cultural aspects that are affected

 \Box \Box Interactions and mutual tolerance between the groups

□ □ Present distance between the settlements and other common amenities.

 \Box \Box Land tenure pattern

 $\Box \Box$ Access to common property resources

□ □ Household's present economic activities, and the extent to which they affected

11. Study Duration

The independent monitor will be employed with intermittent inputs of total four man months.

12. Reporting Requirement

Half yearly monitoring report should be submitted to the PIO and simultaneously to the Project Director.

13. Minimum requirements

The successful candidate will meet the following:

□ University degree in social sciences;

 \Box 10 years experience in conducting Social Studies

□ A minimum of 5 years relevant experience as an independent Monitor of social issues;

□Knowledge of National Laws regarding land administration and acquisition/requisition

□Knowledge of Tribal peoples' groups in Bangladesh;

□Fluency in English and Bangla.