

# Program Safeguard Systems Assessment

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## People's Republic of Bangladesh: Technical and Vocational Education and Training (TVET) Teachers for the Future (TTF) Program

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**Asian Development Bank**



## PROGRAM SAFEGUARD SYSTEMS ASSESSMENT

1. The proposed Asian Development Bank (ADB)'s Technical and Vocational Education and Training (TVET) Teachers for the Future (TTF) Program, a results-based lending (RBL) program, will strengthen TVET teachers' training delivery system to develop qualified TVET teachers inclusively in modern and emerging technologies. The TTF-RBL program will assist Bangladesh Government in expanding its broader development program coverage focusing on the TVET teacher training system, including: (i) facility expansion and operationalization, equipment procurement and utilization, virtual training system piloting; (ii) curriculum modernization, relevant TVET teacher recruitment and their training, training of trainers, establishment of industry linkage, continuous professional development, and arrangements of stipends; and (iii) policy formulation, development of training programs, monitoring and evaluation, and fiduciary management. The executing agency (EA) is Technical and Madrasah Education Division (TMED) under the Ministry of Education, and the implementing agency (IA) is the Directorate of Technical Education (DTE). The TTF-RBL program will establish training facilities (including new academic buildings and supplementary facilities in four sites) and extend or renovate training buildings at existing TVET institutions' premises. The program safeguards system assessment (PSSA) was conducted to identify any programmatic, institutional, and contextual risks of the program in terms of environmental and social safeguards implementation, and to assess the executing agency's capacity and commitment to manage risks following the Safeguard Policy Statement (SPS) (2009) of ADB.

### A. Program Environmental and Social Impacts and Risks

2. **Environment.** Under the output 1 which focuses on facility expansion and operationalization, the TTF-RBL program will assist TMED to upgrade and establish TVET teacher training facilities in 8 geographical areas of Bangladesh within the existing polytechnic institute campuses that include construction of academic buildings and dormitories and lending hand to several repairs, vertical expansions, renovations and retrofits for academic buildings and dormitories. Due diligence done for this PSSA within the identified scope indicates that the program is unlikely to cause any significant adverse impacts on the environment and all the expected adverse impacts will be restricted within the current polytechnic campus boundaries. However, the proposed civil works have potential to pose some adverse social and environmental impacts. The possible adverse environmental impacts from construction and renovation activities are site-specific, temporary, reversible, restricted within existing polytechnic campus premises and are not expected to take place in environmentally sensitive locations. High pitch construction noise, high volume dust generation and local ponding of water and construction wastes are expected to impact local environment and communities. Traffic congestion due to construction vehicles are also expected. Some worker occupational health safety issues might be observed during construction period. However, given the in-campus nature of construction, occurrence of community health safety issues is not envisaged.

3. Given the geographical location of the sites, specific nature of construction activities and size of the physical infrastructures, the environmental risks of the program have been categorized as "B" which will require to prepare site-specific Initial Environmental Examination (IEE) report including Environmental Management Plan (EMP) as per ADB SPS 2009. According to the Bangladesh Environment Conservation Rules (ECR) 2023 the safeguard category of the program is likely to be 'Orange' which will require to obtain Location Clearance Certificate (LCC) and Environmental Clearance Certificate (ECC) from the Department of Environment (DOE) by submitting the site-specific Environmental Impact Assessment.

4. **Involuntary resettlement.** Due diligence conducted in 8 selected sites, screened for Involuntary Resettlement (IR) in adherence to the country's and ADB's social safeguard guidelines. The methods employed included stakeholder consultations and a review of secondary data, aligning with Bangladesh's policies and legal framework for social safeguarding. This involved consultations with EA, IAs, CSOs, beneficiaries, and community members in 8 target divisional cities. The results of the due diligence categorized the proposed TTF-RBL program as "C" for Involuntary Resettlement (IR) impacts according to ADB SPS 2009 as the anticipated civil works are within existing boundaries of the targeted 8 sites. Therefore, no land acquisition will be required. The proposed interventions will not involve any temporary or permanent livelihood impacts or impacts on non-title holders since none are present within the premises.

5. **Indigenous peoples.** The proposed TTF-RBL program has been screened against the TTF-RBL social safeguard screening checklist for eligible activities developed by ADB. The Indigenous Peoples (IP<sup>1</sup> and Small Ethnic Communities (SEC)<sup>2</sup> risks categorization has also been done using the ADB approved checklists. TVET Teacher training will be delivered in eight divisions using existing campuses. The RBL program will not directly benefit or target IP. No negative impacts on customary land, livelihood or socio-cultural environment of any IP will be triggered due to the program interventions since there are no IP communities as per the SPS 2009, Safeguards Requirements 3 in the program impact zone. Any positive impacts will be at individual level to those who participate in the program. With this aspect, the IP category for the program is "C".

## **B. Safeguard Policy Principles Triggered**

6. Considering the activities and potential impacts that may be associated with the proposed RBL program and having reviewed the applicable safeguards policies and implementation practices of the Government of Bangladesh (GOB) and ADB's SPS 2009, the PSSA concludes that the several safeguard policy principles are triggered, as shown in Annex 1.

## **C. Diagnostic Assessment**

### **1. Assessment Methodology and Resources**

7. The PSSA is prepared adhering ADB's SPS 2009 according to the guidelines for safeguards requirements 01,02, and 03. The assessment is prepared following the OM section D18 and Technical Staff Guidance for Results-Based Lending for Programs (2021) through (i) a desk review of relevant national and international environmental laws, regulations, and policies, as well as due diligence of similar program-level environmental, Involuntary Resettlement, IP and SEC safeguard reports, standard bidding documents, and works contracts; (ii) site visits and consultation with community and stakeholders at the institutions of planned civil works; and (iii) consultation with key stakeholders via meetings and interviews between January 2020 and October 2023. The assessment includes (i) an equivalence assessment between national,

<sup>1</sup> ADB's SPS, SR 3 recognizes that IP could be termed differently in each country. For operational purpose, the term Indigenous People refers to (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; (iii) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and (iv) a distinct language, often different from the official language of the country or region area.

<sup>2</sup> The term Indigenous People in the context of ADB SPS 2009-as referred in SR 3-para 6 (page 56), will be replaced by SEC-Small Ethnic Communities for the program according to the constitutional requirement of Bangladesh in 15 amendment, section 23(A).

provincial, and local environmental, Involuntary Resettlement and SEC/Indigenous Peoples regulations (e.g., BECA 1995<sup>3</sup> and its amendments, ECR 2023,<sup>4</sup> NEP 2018<sup>5</sup> etc.) and ADB's SPS environment safeguard policy principles (2009); (ii) an adequacy assessment of program environmental management practices with regard to capacity for environmental impact screening; environmental management planning, implementation, monitoring, and reporting; and public engagement (through information disclosure, consultations, and grievance redress procedures); and (iii) identification of procedural gaps relating to information disclosure, public consultations, the grievance redress mechanism, environmental monitoring and reporting, and categorization criteria.

## 2. Environment

8. **Policy and legal framework.** The GOB has a set of laws, policies, rules, and regulations that target addressing environmental and social issues. The most important ones are the Bangladesh Environmental Conservation Act, 1995 (BECA, 1995)<sup>6</sup> and the Environmental Conservation Rules (ECR, 2023). Besides, there are various other acts, policies and rules that deal with specific areas like forests, wildlife, coastal areas, labor welfare, and occupational health and safety. The BECA is a set of laws enacted by the GOB in 1995 to conserve the environment, improvement of the environmental standards, and control and mitigation of environmental pollution. The ECR classifies industrial units or projects into four categories according to their location and impact on the environment. Each category (red, orange, yellow, and green) requires different levels of environmental assessment as a prerequisite for the government's issuance of the ECC and Location Clearance Certificate (LCC). For any red (most sensitive), orange (high to moderately sensitive) or yellow (minor to moderate sensitive) category project, an IEE must be submitted to the DOE to obtain clearance to proceed to construction. If orange category is upgraded to red upon DOE's review, a full EIA is required. All red category projects require DOE-approved IEE before proceeding to EIA preparation.

9. The ECR 2023 legally requires "public consultation" and information disclosure during environmental assessments. The ECR also specifies requirements for scoping, alternative analysis, impacts prediction methods and tools, EIA review, occupational health and safety, and environmental management plans. The ECR 2023 and supporting laws such as Air Quality Control Rules (2022), Sound Pollution Control Rules (2006) etc. lay down drinking water or surface water standards, ambient environment, and activity-wise discharge or emission standards for pollutants. The National Environmental Policy (NEP) 2018 is the central policy of the Government that directs all the policies. In addition to the central environmental policy instrument, a number of other national policy efforts have significant environmental content and applicable to this RBL program: (i) Bangladesh Biosafety Rules, 2012; (ii) Bangladesh Biological Diversity Act 2017; (iii) Natural Water Reservoir Conservation Act, 2000; (iv) National 3R (Reduce, Reuse & Recycle) Strategy 2010; (v) Bangladesh Climate Change Strategy & Action Plan (BCCSAP) 2009; (vi) National Adaptation Plan 2021; (vii) Bangladesh Delta Plan 2100; (viii) National Disaster Management Plan 2010; (ix) Noise Pollution (Control) Rules, 2006; (x) encroachment of water bodies (Urban open fields, gardens, natural water bodies, protection Act, 2000); (xi) occupational health, safety, labor welfare and child labor (National Building Code, 2020, Labour Act, 2006; and as amended in 2013), Labour Rules, 2015; (xii) National Child Labor Elimination Policy 2010; and (xiii) National Occupational Health and Safety Policy, 2013 and Public Procurement Rule, 2008).

<sup>3</sup> [Bangladesh Environmental Conservation Act, 1995](#) (accessed 5 November 2023).

<sup>4</sup> [Bangladesh Environmental Conservation Rules \(2023\)](#) (accessed 5 November 2023).

<sup>5</sup> [National Environment Policy \(2018\)](#) (accessed 5 November 2023).

<sup>6</sup> The Act was amended in 2000, 2002, and 2010.

Environment Courts Act, 2010, provides mechanism to deal with environmental complaints and offenses.

10. **Institutional capacity and implementation practices.** The TMED as the EA will coordinate the TTF-RBL program while the DTE will manage the day-to-day program implementation. The RBL program has two other implementation partners: Education Engineering Department (EED) and Bangladesh Technical Education Board (BTEB). TMED will provide overall leadership, strategic guidelines, and inter-ministerial or organizational coordination for effective implementation of the program. DTE will be responsible for overall implementing the program. A program support unit (PSU) will be established at DTE. PSU would comprise of a management team led by the full-time Program Director (PD) supported by other staff. Program Director will manage PSU under the overall guidance and supervision of Director General (DG) of DTE. EED will execute the civil works under this program while BTEB will be responsible for curriculum revision.

11. Currently both the EA and IA do not have in-house capacity to carry out environmental due diligence and implementation of environmental safeguards. The program level management that is envisaged for the TTF-RBL program has three tiers. The Inter-ministerial Program Steering Committee (PSC) will be formed to provide overall guidance, policy advice and decision, and coordination of activities of the Program addressing contentious issues that may arise during implementation. The PSC will be chaired by the Secretary, TMED. As per the guidelines of the Planning Commission, a Program Implementation Committee (PIC) will be formed led by the Director General, DTE. a PSU will be established under the DTE, and a full-time Program Director will be appointed as per the government rules and regulations. The PSU is responsible for facilitating, coordinating, and monitoring the implementation of the TTF-RBL program. The PSU also will provide a common forum to discuss implementation issues and to make efforts to resolve problems emanating from implementation. If problems cannot be resolved at this level, these will be escalated to the PIC/PSC level for resolution. Given that DTE does not have enough experience in implementing environmental safeguard issues, the PSU will host a sperate fulltime safeguards unit consisting of expert consultants to implement and manage safeguards issues in the field.

12. **Grievance redress mechanism.** Given the nature of the program, it is expected that this program will not trigger any grievance during implementation of civil works and resettlement. The existing public grievance redress system (GRS) in TMED and DTE has not been fully functional due to its mandates and resulting lack of capacity as mentioned in para 11. The program envisages strengthening the grievance redress system with capacity building at the TMED and DTE and other relevant ministry and department levels. The strengthened GRS will be composed of two tiers: at site levels and at program level. Representatives from PSU concerned Ward Counselor/Chairman of City Corporation, site representatives from construction team, and a representative from concerned community, are all members of the GRS. The GRS will meet all affected persons who have grievances informally, as well as formally, to ensure speedy and out of court settlement, for as many disputes, as possible. Irrespective of the GRS decisions, an aggrieved person will be free to access the country's legal system at any stage. The key functions of a GRS will be focusing to (i) record the complaints, (ii) settle the grievances in a consultative fashion, (iii) report to the aggrieved parties about the solution, and (iv) refer the unresolved cases to higher authorities. The grievances should be resolved at the site level and the solution agreed with the aggrieved person.

13. **Programmatic risks.** Programmatic risks associated with adverse environmental impacts are not expected to be significant. Construction and operational activities are not expected to

increase the risk of increasing environmental impacts through interaction with other activities. Natural disasters and climate change impacts may affect outcomes of the construction program. The TTF-RBL program will ensure that climate changes risks and natural hazards are considered in finalizing building designs. As mentioned earlier, TMED and DTE do not have enough experience in implementing environmental safeguards at project levels. Hence, with the involvement of other government departments for implementation of the TTF-RBL program, staff capacity building and hiring safeguards specialists will be needed for effective safeguards management. As mentioned earlier, the safeguards team located at the PSU will be responsible for continuous monitoring and reporting back to the DG of DTE and ADB. The team will be submitting semi-annual Environmental Monitoring Reports to ADB safeguards team for review and suggestions.

14. **Institutional risks.** Institutional risks are not expected to be significant. There is a possibility of poor coordination and lack of alignment among the key implementing agencies, which can be a major “roadblock” for TTF-RBL program. Another major issue regarding the safeguards is that the EA and IA do not have in-house trained environmental and social safeguards staff, as mentioned earlier. To safeguard these risks, PSU will be fortified with a dedicated Central Safeguards Unit lead by the Deputy Project Director (DPD) and overall coordination by the PD. A Safeguard Focal Person will be assigned at the Central Safeguards Unit, who is the DPD of the program, while a fulltime environmental specialist will be assigned for the entire program period. The Central Safeguards Unit will be responsible for implementing the environmental and social safeguard provisions during the Program implementation. Since this program is very much like other skill development projects aided by ADB, existing environmental assessment procedure will be reviewed for its effectiveness and updated based on the final findings from the Environmental and Social Safeguards Assessment. Based on the preliminary findings, focus will be given to strengthening at the PSU and EED levels. This proposed program will continue to provide technical guidance, allowing continuous improvement on BTEB, DTE and EED’s E&S safeguards measures implementation capacity.

15. **Contextual risks.** The construction and renovation will take place within the targeted campuses. The sites are located within urban setting within existing polytechnic campus boundaries which are not within 10km buffer zone of any environmentally sensitive areas declared by the Bangladesh Government (e.g., Ecologically Critical Areas (ECA), Protected Area (PA), Sanctuary, Forest etc.). Hence, the program activities are not proposed in sensitive E&S settings where likely impacts may be intensified. There are no known legacy or unresolved issues that might affect the commitment and the performance of the program.

16. **Gaps identified.** This assessment found the following key gaps between the RBL program safeguards systems and relevant environment related safeguards system prevailing in Bangladesh: (i) lack of scope of monitoring of EMP implementation process and corrective actions requirements within the current GOB laws, rules and regulations; (ii) inadequate quality reporting of EMP implementation progress, which is a requirement in the RBL program; and (iii) a lack of grievance redress mechanism in safeguards system within BTEB, DTE and EED. The major potential weakness in implementing the RBL program has been found as: (i) possibility of poor coordination and lack of alignment among the key implementing agencies; (ii) lack of trained safeguards staff at the executive agency; and (iii) inadequate capacity in implementing social and environmental safeguards. These weaknesses will be addressed through agreed program action plans.

### 3. Social Safeguards

### a. Involuntary Resettlement

17. **National legal system.** There is no comprehensive national Involuntary Resettlement policy. The national policy governing in this aspect is the Acquisition and Requisition of Immovable Property Act 2017 (ARIPA) is Bangladesh's primary legislation on eminent domain for land acquisition and requisition. The policy is only applicable once land acquisition is triggered. Impacts on non-titled persons or livelihood are not eligible for any compensation or comprehensive restorative action plans. Land Acquisition applies Eminent Domain. There are also no legal eligibilities for non-titled settlers or squatters to receive compensation for their economic losses due to land acquisition.

18. **Land acquisition and involuntary resettlement assessment.** The Involuntary Resettlement principles of ADB SPS 2009 apply to program-related components and activities causing involuntary resettlement indirectly. For the proposed program interventions, land acquisition or any Involuntary Resettlement impacts will not be required, since all infrastructure development will be completed within the existing premises under the ownership of respective training institutions. According to the due diligence and screenings conducted in 8 selected locations, it has been established that no temporary or partial IR impacts will be caused from the program interventions. The participants including TVET institutions' Principals and teachers, district/Upazila administrations and officials, TVET students, graduates, their parents, and community people shared "what worked" and "what did not work" in current TVET system in Bangladesh. It would be critical to maintain coordination for the project with local community expectation and concerns and identify means to ensure the program interventions adequately reflect needs-based capacity enhancement initiatives that are practical with local socio-economic contexts.

### b. Small Ethnic Communities

19. **Policy and legal frameworks.** The peace accord signed in 1997, promised to bring stability and development to CHT<sup>7</sup> region. According to the peace accord, enactment of the three revised Hill District Council Acts and Regional Council Act, and Hill District Local Government Council Acts of 1989" (Acts XIX, XX, XXI of 1989). These three acts established autonomous bodies known as Hill District Councils in the three districts of the CHT as well as the establishment of Ministry of CHT Affairs. Chittagong Hill Tracts Regional Council is the local government body responsible for the welfare and administrative operations in CHT.

20. **Current practices, gaps identified, and mitigation measures.** The development partners endorse the safeguard policies of ADB and the World Bank to foster full respect for indigenous peoples' identity, dignity, human rights, livelihood systems, and cultural uniqueness, as defined by the indigenous peoples themselves, so that they (i) receive culturally appropriate social and economic benefits, (ii) do not suffer adverse impacts as a result of projects, and (iii) can participate actively in projects that affect them. The proposed program will focus on vulnerable persons. However, SEC/IP impacts will not be triggered. The detailed IP assessment is presented in the annex.

21. **Grievance redress mechanism.** Given the nature of the program, it is expected that this program will not trigger any grievance during implementation of civil works. the existing GRS will be strengthen (see para. 12) to address and manage any grievances on environmental and SEC

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<sup>7</sup> The three hill districts of Rangamati, Khagrachari and Bandarban in the Bangladesh are collectively known as the Chittagong Hill Tracts (CHT).



issues. The key functions of a GRS will be focusing to (i) record the complaints, (ii) settle the grievances in a consultative fashion, (iii) report to the aggrieved parties about the solution, and (iv) refer the unresolved cases to higher authorities. The grievances should be resolved at the site level and the solution agreed with the aggrieved person.

#### D. Safeguard Program Actions

22. Given the variations identified in the earlier sections, the following key actions are proposed across all three safeguard areas (environment, indigenous peoples, and involuntary resettlement): (i) implement the Environmental Assessment and Review Framework (EARF) and environmental management plans (EMPs) (as drafted) for compliance with safeguards; (ii) designate a safeguards team at PSU with some on-field safeguards operatives; and (iii) build the capacity of PSU and field personnel at the project management level, including the ability to conduct impact assessments, continue meaningful consultations with the targeted campuses, and disclose safeguard plans and reports.

23. The PSSA identified safeguard-related program actions that relate mostly to institutional strengthening, as described in Table 1.

**Table 1: Safeguards Program of Actions**

Action Description	Responsibility	Time frame	Measurement indicator
1. Hard copies of the relevant EMP(s) are kept at construction site	Implementing partner (EED), contractor(s)	During camp setting and site clearance at construction site	Hard copies of EMP available at construction site offices
2. A Central Safeguards Unit to be established at the PSU consisting of a safeguard's focal person, environmental specialist, and a civil engineer. The team will be led by Deputy Project Director who will be assigned as the 'safeguards focal person' for the program	DTE	Within 4 weeks of program commencement. The Environmental Specialist needs to be employed full time during the entire construction period, then can be employed part time for the rest of the project period.	A Central Safeguards Unit is formed and detailed information of the team is shared with ADB
3. Separate Safeguards Training program should be arranged for the EED and DTE personnel and Contractors to sensitize them on safeguards issues	Environmental Specialist appointed at PSU at DTE	Within 8 weeks of program commencement	Separate safeguards programs arranged for the BTEB, DTE staff and contractors, and information shared with ADB
4. Location Clearance Certificate and Environmental Clearance Certificate to be obtained for each construction location (either obtained individually for each site or obtained as a cluster)	DTE, Environmental Specialist at PSU	Within 10 weeks of program commencement	A copy of ECC from DOE kept at all sites and shared with ADB safeguards team.
5. Semi-annual Environmental Monitoring Report during construction and annual report during operation until Program Completion Report is issued for the RBL for ADB's review and approval.	DTE, Environmental Specialist at PSU	Within one month of progress reporting period (Jan – Jun and Jul – Dec)	ADB approved continuous EMRs during construction period

ADB = Asian Development Bank, BTEB = Bangladesh Technical Education Board, DTE = Department of Technical Education, DOE = Department of Environment, ECC = Environmental Clearance Certificate, EMP = Environmental Management Plan, EED = Education Engineer Department, PSU = program support unit.

Source: Asian Development Bank.

24. **Involuntary Resettlement related program actions.** The due diligence revealed that the proposed TTF-RBL program falls under category “C” IR impacts. Therefore, there is no requirement for a comprehensive action plan to manage IR issues. However, a one-time “Screening” activity is to be provisioned for the TTF-RBL program before the works contract award to assess any IR impacts in case of change in scope. As well as building the PSU staff’s capacity on SPS and national laws for improved management of social safeguards.

25. **Indigenous People safeguard-related program actions.** The PSSA has identified program actions related to safeguarding, primarily focused on enhancing institutional and program capacities. The assessment acknowledges that there are no major significant gaps in the TMED and DTE. Recognizing the importance of effective program management, PSU, will be established to oversee, implement, and coordinate the proposed TTF-RBL Program. Social safeguards related actions are detailed in the following Table 2.

**Table 2: Social Safeguard Related Action Description**

<b>Social Safeguards</b>			
<b>Action Description</b>	<b>Responsibility</b>	<b>Time frame</b>	<b>Measurement indicator</b>
1. Undertake screening and impact assessment. The program is category C for IR and SEC or Indigenous People. In case of impacts, the PSSA and PAP will be revisited and updated to assess triggered policy principles, identify action description to mitigate the risks and assess stakeholders’ capacity to manage the risks.	Implementing agencies (DTE), TMED, MOE	Implementation period- only in case of scope change	One time activity prior works contract award.
2. While implementation and development of various program scopes, the proposed program will undertake necessary efforts, such as consulting with beneficiaries, addressing social barriers, and raising awareness among TVET teachers and students.	Implementing agencies (DTE), TMED, MOE	Implementation period	Initiatives to be reflected in progress report for the project.

DTE = Department of Technical Education IR = Involuntary Resettlement, MOE = Ministry of Education, PSSA = program safeguard system assessment, PAP = program action plan, SEC = Small Ethnic Community, TMED = Technical and Madrasa Education Department, TVET = Technical and Vocational Education and Training.

Source: Asian Development Bank.

## **E. Conclusion**

26. The overall environmental safeguard risk is *moderate* because (i) there is a moderate likelihood of program activities leading to some adverse impacts on the environment; (ii) the adverse impacts tend not to be in environmentally or socially sensitive areas; (iii) the program operations are unlikely to have significant adverse impacts and would not be at risk of disasters; (iv) program activities are small in scale, well known, and manageable with existing processes and procedures; (v) none of the program’s activities are expected to have negative impacts on SEC/IPs, women, the poor, and other vulnerable groups; (vi) the institutional, contextual, and programmatic risks are well understood and limited in impact; (vii) EED and DTE as well as the local governments have experience in managing risks, although capacity building and training measures may be needed; and (viii) risk management measures are predictable and readily available.

### ANNEX 1: Safeguard Policy Principles Triggered

Principles	Description
<b>Environmental safeguards</b>	
<p><b>Principle 1:</b> Use a screening process for each proposed project, as early as possible, to determine the appropriate extent and type of environmental assessment so that appropriate studies are undertaken commensurate with the significance of potential impacts and risks.</p> <p><b>Principle 2:</b> Conduct an environmental assessment for each proposed project to identify potential direct, indirect, cumulative, and induced impacts and risks to physical, biological, socioeconomic (including impacts on livelihood through environmental media, health and safety, vulnerable groups, and gender issues), and physical cultural resources in the context of the project's area of influence. Assess potential transboundary and global impacts, including climate change. Use strategic environmental assessment where appropriate.</p>	<p>The proposed RBL program has been screened against the RBL environmental and social screening checklist for eligible activities developed by ADB. Environment and climate risk categorization have also been done using the ADB approved checklists.</p> <p>As an overall mitigation plan, an EARF has been developed specifically for this program and is applied to ensure avoiding environmentally sensitive areas for construction and guide the environmental assessment and mitigative measures. The EARF sets out procedures, guidelines and standards related to screening of the planned physical infrastructures, possible renovation works and preparation of extensive environmental management and mitigation plan. The EARF seeks to ensure environment-friendly design and mitigate environmental and health safety risks associated with construction of labs and academic building facilities in consistent with the environmental features of the targeted sites.</p> <p>Based on the suggestion from environment categorization and guidance of the EARF, subproject wise IEEs are under preparation, which include temporal and spatial scopes of adverse impact assessment at various levels including physical, biological, and socioeconomic risks. The IEE(s) also include cumulative impact assessment and global impacts if there is any.</p>
<p><b>Principle 3:</b> Examine alternatives to the project's location, design, technology, and components and their potential environmental and social impacts and document the rationale for selecting the alternative proposed. Also consider the 'no project' alternative.</p>	<p>Although the expected construction activities are not large, they are still expected to create a large carbon footprint. But given the nature of geography and in-campus construction, the structures may not require elaborate measures to mitigate impacts. However, alternatives in terms of type of materials and technology are explored (e.g., solar panels, rainwater harvesting, non-asbestos-containing materials, green building designs, low carbon emission construction materials, etc.) during the feasibility studies and preparation of the IEEs.</p>
<p><b>Principle 4:</b> Prepare an environmental management plan (EMP) that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or</p>	<p>As per guidance of the EARF appropriate, required IEEs are in preparation. Site-specific EMPs are stipulated within the IEEs. The site-specific EMPs include the proposed mitigation measures, environmental monitoring and reporting</p>

Principles	Description
organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators. Key considerations for EMP preparation include mitigation of potential adverse impacts to the level of no significant harm to third parties, and the polluter pays principle.	requirements, institutional or organizational arrangements, implementation schedule, indicative budget, capacity development and training measures, and performance indicators.
<b>Principle 5:</b> Carry out meaningful consultation with affected people and facilitate their informed participation.	The construction will take place within campus premises on designated baren lands permitted by the TMED authority. Hence, impacts on the community living outside the campus boundaries are insignificant. Consultations have been conducted with faculties and students during the preparation of IEEs, reflecting in the preparation of EMPs and presented in the relevant section of the IEE reports which are under preparation.
<b>Principle 6:</b> Disclose a draft environmental assessment (including the EMP) in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. Disclose the final environmental assessment, and its updates if any, to affected people and other stakeholders.	The IEEs including EMPs, as required, are under preparation. When ready and approved, they will be disclosed on ADB's website for public viewing. The IEE(s) will also be uploaded in the Executing Agency's website as well. A hard copy of the IEE documents will be kept at the Project Director's office and construction sites.
<b>Principle 7:</b> Implement the EMP and monitor its effectiveness. Document monitoring results, including the development and implementation of corrective actions, and disclose monitoring reports	The implementation of the EMP is a requirement which is stipulated in the IEEs which are under preparation. The Program Support Unit (PSU) established under this project headed by the Project Director (PD) appointed by TMED will serve to facilitate, coordinate, and monitor all project activities under this RBL program. A central safeguards team will be established under the PSU headed by the Deputy Project Director as Team Leader of the unit. The Team Leader together with a full-time civil engineer and a full-time environmental specialist will form the Central Safeguards Unit which will oversee the monitoring and implementation of the EMPs that are stipulated in the IEE(s). This team will oversee implementation, take corrective actions and report back to the PSU. A capacity building program will be designed for the PSU to comply with ADB and country safeguard system. The PSU will be responsible for submitting bi-annual environmental safeguards monitoring reports to ADB. ADB after approval of the reports will

Principles	Description
	disclose on website as per Access to Information Policy (2018) for public viewing.
<b>Principle 8:</b> Do not implement project activities in areas of critical habitats	<b>This policy principle is not triggered.</b> The construction will take place within the existing campus premises of city's-built area. There are no government declared Ecologically Critical Areas (ECA), Protected Areas (PAs), National Parks or Sanctuaries within the 5km buffer zone of the proposed sites. Any activity in critical habitats will be excluded.
<b>Principle 9:</b> Apply pollution prevention and control technologies and practices consistent with international good practices	The EARF was prepared based upon the national and international laws and regulations and ADB's SPS 2009. Additionally, the IEE(s) under preparation will formulate detailed guidelines for good environmental management practices and ensure environmentally friendly and climate resilient construction activities. Prevention of pollution guidelines, greenhouse gas reduction mechanisms, containment of hazardous materials etc. will be stipulated in the EMPs.
<b>Principle 10:</b> Provide workers with safe and healthy working conditions and prevent accidents, injuries, and disease. Establish preventive and emergency preparedness and response measures to avoid, and where avoidance is not possible, to minimize, adverse impacts and risks to the health and safety of local communities.	Construction activities may generate solid waste, dust, noise, and wastewater that should be reduced or disposed of appropriately. They may also result in injuries to workers. Contractors will be required to strictly observe construction health and safety requirements. The EARF and the EMPs stipulated in the IEEs will identify such potential impacts and the corresponding mitigating measures. These risks will be monitored during the construction period against the approved EMP. The IEE and EMP will be included in the bidding document and then in the works contract.
<b>Principle 11:</b> Conserve physical cultural resources and avoid destroying or damaging them by using field-based surveys that employ qualified and experienced experts during environmental assessment.	Anticipated construction works will be within existing campus premises owned by the government. Construction activities are required to comply with the EARF and EMP(s) stipulated in the IEE(s). No damage to physical and cultural resources will be allowed.

ADB = Asian Development Bank, EARF = Environmental Assessment and Review Framework, ECA = Ecologically Critical Area, EMP = Environmental Management Plan, EED = Education Engineer Department, IEE = Initial Environmental Examination, PA = protection area, PD = Program Director, PSU = program support unit, SPS = Safeguard Policy Statement, TMED = Technical and Madrasa Education Department.  
Source: Asian Development Bank.

## Social Safeguards

<b>Involuntary Resettlement</b>	
<b>Principle 1.</b> Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks.	<p>Only Principle 1 has been partially triggered: Screenings have been conducted for eight selected sites to confirm IR impacts.</p> <p>The program is not expected to trigger land acquisition or involuntary resettlement. IR category is C. All construction works under the TTF-RBL program will be completed within existing boundaries or campus of TTTC, VTTI or Polytechnics.</p> <p>Therefore, the Involuntary Resettlement principles of ADB SPS 2009 will not trigger for the works under this program.</p>
<b>Principle 2.</b> Carry out meaningful consultations with affected persons, host communities, and concerned nongovernment organizations.	
<b>Principle 3.</b> Improve, or at least restore, the livelihoods of all displaced persons with needed assistance.	
<b>Principle 4.</b> Provide physically and economically displaced persons with needed assistance.	
<b>Principle 5.</b> Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards. In rural areas provide them with legal and affordable access to land and resources, and in urban areas provide them with appropriate income sources and legal and affordable access to adequate housing.	
<b>Principle 6.</b> Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter negotiated settlements will maintain the same or better income and livelihood status.	
<b>Principle 7.</b> Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets.	
<b>Principle 8.</b> Prepare a resettlement plan elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule.	
<b>Principle 9.</b> Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner,	

<b>Involuntary Resettlement</b>	
before project appraisal, in an accessible place and a form and language(s) understandable to affected persons and other stakeholders	
<b>Principle 10.</b> Conceive and execute involuntary resettlement as part of a development project or program. Include the full costs of resettlement in the presentation of project's costs and benefits	
<b>Principle 11.</b> Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout project implementation.	
<b>Principle 12.</b> Monitor and assess resettlement outcomes, their impacts on the standards of living of displaced persons, and whether the objectives of the resettlement plan have been achieved by considering the baseline conditions and the results of resettlement monitoring.	

<b>Indigenous Peoples</b>	
<b>Principle 1.</b> Screen early on to determine (i) whether indigenous peoples are present in, or have collective attachment to, the project area; and (ii) whether project impacts on Indigenous peoples are likely.	Triggered: All eight sites have been screened. The construction works will be within the existing campus of existing teachers training or vocational learning institutions in eight selected institutions. The program will not negatively impact the SEC/IP people. This policy principle is therefore not triggered since there are no existing settlements near to the existing campus or within adjacent area. No impacts on SEC/IP communities are anticipated.
<b>Principle 2.</b> Undertake a culturally appropriate and gender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on Indigenous Peoples. Consider options the affected Indigenous Peoples prefer in relation to the provision of project benefits and the design of mitigation measures. Identify social and economic benefits for affected Indigenous Peoples that are culturally appropriate and gender and intergenerationally inclusive and develop measures to avoid, minimize, and/or mitigate adverse impacts on Indigenous Peoples.	This policy principle is not triggered as the modern TVET Teacher training will be delivered in existing campuses of selected training institutes in eight divisions. During the design of the TTF-RBL program, consultations have been conducted with key stakeholders on SEC/IP social safeguards and associated social risks.  The SEC/IP communities will not have any negative or direct positive impacts. But the facilities will be open for all capable participants to benefit with special focus to vulnerable persons.

<p><b>Principle 3.</b> Undertake meaningful consultations with affected Indigenous peoples and their communities, and with Indigenous people's organizations, to solicit their participation.</p>	<p>Partially Triggered: To solicit SEC/IP participation in the program design a comprehensive stakeholder consultation occurred during the design of the TTF-RBL program, with 69 participants. Approximately 35% of the participants were women. Selection criteria prioritized Indigenous people (IP), persons with disability, and those with poor and vulnerable backgrounds. The consultation aimed to ensure active participation of SEC/IP people, addressing their concerns in program design and implementation. It sought to identify capacity-building needs, exchange views, and incorporate recommendations into the proposed TTF-RBL program.</p> <p>No SEC/IP communities will be negatively affected by the program and therefore, this policy principle will not be triggered.</p>
<p><b>Principle 4.</b> Ascertain the consent of affected Indigenous Peoples communities to the following project activities: (i) commercial development of the cultural resources and knowledge of Indigenous Peoples; (ii) physical displacement from traditional or customary lands; and (iii) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual uses that define the identity and community of Indigenous Peoples. For the purposes of policy application, the consent of affected Indigenous Peoples communities refers to a collective expression by the affected Indigenous Peoples communities, through individuals and/or their recognized representatives, of broad community support for such project activities. Broad community support may exist even if some individuals or groups object to the project activities.</p>	<p>This policy principle is not triggered as the modern TVET Teacher training will be delivered in all eight divisions through existing TTTC, VTTI and Polytechnics.</p>
<p><b>Principle 5.</b> Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected Indigenous peoples participate in the design, implementation, and monitoring and evaluation of management arrangements for such areas and natural</p>	<p>This policy principle is not triggered. All construction works under the TTFP program will be completed within existing boundaries or campus of TTTC, VTTI or Polytechnics. Any activities that may lead to Involuntary Resettlement impacts will be excluded from the program.</p>



resources, and that their benefits are equitably shared.	
<b>Principle 6.</b> Assisted by qualified and experienced experts, prepare an Indigenous people's plan (IPP) that is based on the social impact assessment, draws on indigenous knowledge, and encourages the participation of the affected communities of indigenous peoples.	The TTF-RBL program will specifically target dimensions of poverty and social exclusion that extend beyond mere income considerations. The examination of the PSSA and SEC/IP screening checklist indicates that SEC/IP individuals are not expected to experience adverse impacts. This policy principle will not be triggered.
<b>Principle 7.</b> Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected Indigenous Peoples communities and other stakeholders. The final IPP and its updates will also be disclosed to the affected Indigenous Peoples communities and other stakeholders.	Since the program do not trigger IP safeguards, separate IPP has not been prepared at this stage. The PSSA includes documentation on consultation. This will be disclosed to ADB website. The program QPR will include one paragraph on social safeguards to reflect updates on monitoring of social safeguards issues.
<b>Principle 8.</b> Prepare an action plan for legal recognition of customary rights to lands and territories or ancestral domains when the project involves (i) activities that are contingent on establishing legally recognized rights to lands and territories that Indigenous Peoples have traditionally owned or customarily used or occupied, or (ii) involuntary acquisition of such lands.	This policy principle is not triggered as the modern TVET Teacher training will be delivered in all eight divisions through existing TTTC, VTTI and Polytechnics. No negative impact on customary land or cultural norms will be triggered. SEC/IP safeguards category is C for the project.
<b>Principle 9.</b> Monitor implementation of the IPP using qualified and experienced experts; adopt a participatory monitoring approach, wherever possible; and assess whether the IPP's objective and desired outcome have been achieved, taking into account.  The baseline conditions and the results of IPP monitoring. Disclose monitoring reports.	SECP/IPP preparation will not be required. This policy principle is not triggered as the modern TVET Teacher training will be delivered in all eight divisions through existing TTTC, VTTI and Polytechnics. SEC/IP category is C for the program.

ADB = Asian Development Bank, IPP = Indigenous People's Plan, PSSA = program safeguard system assessment, SEC/IP = TTTC = TVET teacher training institutions, TTF RBL = TVET Teachers for Future program through results-based lending, TTFP = TVET Teachers for Future program, VTTI = vocational training institute, TVET = Technical and Vocational Education and Training.  
Source: Asian Development Bank.

## ANNEX 2: ENVIRONMENT SAFEGUARDS ASSESSMENT

1. The proposed results-based lending (RBL) program is aligned with Asian Development Bank's (ADB) Strategy 2030, ADB's Country Partnership Strategy 2021–2025 for Bangladesh and contributes to strategic objective 3 (strengthen human capital and social protection) by enhancing the quality of the workforce through better education and skills development. The proposed interventions complement the ongoing initiatives of government and other development partners. Technical and Vocational Education and Training (TVET) Teachers for the Future (TTF) is included in the Indicative Country Pipeline and Monitoring 2023–2025. The proposed RBL program will support teacher development area. The program will not include high value procurement contracts and packages. The major outcome envisaged for the RBL program is Industry-oriented TVET teachers developed inclusively in modern and emerging technologies, where the key outputs are: (i) inclusive access to modern TVET teacher training environments improved, (ii) relevance and quality of TVET teacher training system strengthened, and (iii) policy environment and institutional capacity for TVET teacher development improved.

2. **Initial risk assessment for environment:** Following activities under the RBL program will take place: (i) facility expansion and operationalization; equipment utilization; virtual training capacity; inclusive access; (ii) curriculum; teacher recruitment; teacher training; training of trainers; industry linkage; continuous professional development; stipends; and (iii) policy formulation; training programs; monitoring and evaluation and fiduciary.

3. Output 1 of the proposed RBL program is defined as: inclusive access to modern TVET teacher training environment improved. This output includes (i) renovating existing TVET teacher training institutions (TTTC/VTTI) and selected polytechnic institutes; (ii) expanding TVET teacher training space within the premise of selected polytechnic institutes in all divisions; and (iii) strengthening the system for efficiently utilizing the facilities and equipment. Major activities are: (a) renovating, constructing and efficiently operating TVET teacher training facilities (smart classrooms, workshops, labs and supplementary facilities) with adequate equipment for selected modern technologies (mechanical, electrical and electronics, civil engineering, information and communications technology (ICT), and agriculture and food processing) including green skills, providing total physical seat capacity of at least 1,000 in 8 divisions; (b) installing and efficiently utilizing training equipment, including in an 4IR center established under the program, for teacher training, applied projects for industries, and training of students in new technologies; and (c) developing virtual training system with customized or self-developed digital content (supported by digital content studio), which are accessed by TVET teachers in all divisions. A plan will be developed to implement the national green building certification scheme.

4. From an environmental perspective, the benefits from the program include disaster resilient and climate friendly TVET teacher training institutions' (TTTI's) campuses which include construction of academic and hostel buildings. The risks are expected to be moderate given that the projected civil works will be restricted within the polytechnic campuses. Demolition of some old two-storied buildings in two possible sites are also expected to pose short-term site specific and mitigatable impacts on the existing environment.

5. The possible environmental impacts from construction activities are site-specific, temporary, reversible in nature, restricted within existing polytechnic premises and are not expected to take place in environmentally sensitive locations. At this phase, it is envisaged that new constructions of academic and administrative buildings in four sites will be done in existing TTTC, VTTI, and two polytechnic sites with some minor renovation works in existing polytechnics. An Environmental Assessment and Review Framework (EARF) has been developed specifically

for this program and will be applied to ensure avoiding environmentally sensitive areas for construction and guide the environmental assessment and mitigative measures. Community and occupational safety risks are expected from construction activities. The EARF sets out procedures, guidelines and standards related to screening of the TTTI physical infrastructures, possible demolition works and preparation of extensive environmental management and mitigation plan. The EARF seeks to ensure environmentally friendly design and mitigate environmental risks associated with construction of TTTI facilities in consistent with the environmental features of the targeted sites. New construction may create a large carbon footprint on the local ecology and contribute to carbon emission. To mitigate, Constructions will be done using modern construction methods which use less water and more weather durable materials. Rainwater Harvesting systems and Solar Panels will be instilled to conserve water resources and energy. Energy saving technologies will be used to minimize the carbon footprint of the construction and operation. Plantation and green area creation will be done within TTTI campus to enhance carbon sequestration.

6. To date, given the sites, specific nature of construction activities and size of the physical infrastructures, the environmental risks of the project have been assessed as moderate and categorized as “B” which will require to prepare site specific IEEs as per ADB SPS 2009. According to the ECR 97 and its amendments by the DOE, the project might be categorized as “Orange B” which will require to obtain Location Clearance Certificate (LCC) and Environmental Clearance Certificate (ECC) from the DOE by submitting the site-specific Environmental Impact Assessment.

#### A. Environmental Screening Checklist:

Screening questions	Yes	No	Remarks
<b>A. Project siting</b> Is the project area adjacent to or within any of the following environmentally sensitive areas?			
▪ Cultural heritage site		X	All proposed sites are within a well-developed campus area. No cultural heritage site or legally protected areas found nearby.
▪ Legally protected area (core zone or buffer zone)		X	
▪ Wetland		X	
▪ Mangrove		X	
▪ Estuarine		X	
▪ Special area for protecting biodiversity		X	
<b>B. Potential environmental impacts</b> <b>Will the project cause:</b>			
▪ impairment of historical/cultural areas; disfiguration of landscape, or potential loss/damage to physical cultural resources?		X	There are no known historic/cultural areas nearby. The proposed areas are within existing polytechnic campuses.
▪ disturbance to precious ecology (e.g. sensitive or protected areas)?		X	The proposed sites are already developed and used as campuses. Local ecology has been modified during land development of the current campus. However, there is no protected area or sensitive ecology nearby the campuses.

Screening questions	Yes	No	Remarks
<ul style="list-style-type: none"> <li>alteration of surface water hydrology of waterways resulting in increased sediment in streams affected by increased soil erosion at construction site?</li> </ul>	X		The Khulna Polytechnic site is near lowland which is not used. Careless construction process may dump sediment in the lowland and deteriorate water quality and create waterlogging as well. The Chattogram site is located on a steep strip of land where water runoff can be fast. However, both campuses have adequate drainage systems. Therefore, the potential sedimentation problem can be avoided through implementing the EMP.
<ul style="list-style-type: none"> <li>deterioration of surface water quality due to silt runoff and sanitary wastes from worker-based camps and chemicals used in construction?</li> </ul>	X		The Khulna Polytechnic site is near lowland which is not used. Careless construction process may dump sediment in the lowland and deteriorate water quality
<ul style="list-style-type: none"> <li>increased air pollution due to project construction and operation?</li> </ul>	X		Air pollution is likely. Mostly dust will be generated along with some SO <sub>x</sub> , NO <sub>x</sub> , CO and CO <sub>2</sub> from worksite generators, excavators, and drilling machines. EMP to be followed.
<ul style="list-style-type: none"> <li>noise and vibration due to project construction or operation?</li> </ul>	X		Construction works likely to generate noise and vibration, especially during pile driving, drilling, hammering etc. EMP to be followed.
<ul style="list-style-type: none"> <li>involuntary resettlement of people? (physical displacement and/or economic displacement)</li> </ul>		X	The proposed sites are within existing campus premises. Involuntary resettlement is not expected.
<ul style="list-style-type: none"> <li>disproportionate impacts on the poor, women, and children, indigenous peoples, or other vulnerable groups?</li> </ul>		X	The RBL program ensures that the benefit of this program offers equal opportunities for all communities.
<ul style="list-style-type: none"> <li>poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases (such as STIs and HIV/AIDS) from workers to local populations?</li> </ul>	X		Camp site sanitation and Solid waste management is likely to be poor. The EMP will ensure proper management
<ul style="list-style-type: none"> <li>creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents.</li> </ul>	X		Poor sanitation in the camp site may lead to temporary breeding habitats for diseases. EMP to be followed. Workcamp will be ensured to be placed in safe distance from the local residences and campuses.
<ul style="list-style-type: none"> <li>social conflicts if workers from other regions or countries are hired?</li> </ul>	X		Local labor will be hired. However, since all the sites are not populated (except students and teachers), social conflicts are not expected.
<ul style="list-style-type: none"> <li>large population influx during project construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)?</li> </ul>	X		Construction and operation will be on campus. Hence the additional burden on social infrastructure and services are expected to be increased by manageable. EMP to be followed.
<ul style="list-style-type: none"> <li>risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction and operation?</li> </ul>	X		There is always a risk of occupational health and safety during construction work. Accidents may happen. However, no radiological hazard is anticipated. EMP to be followed.

Screening questions	Yes	No	Remarks
<ul style="list-style-type: none"> <li>risks to community health and safety due to the transport, storage, and use and/or disposal of materials such as explosives, fuel, and other chemicals during construction and operation?</li> </ul>	X		Potential risk is envisaged since the campuses are located within respective city's industrial circles. Transportation trucks/vehicles during construction works may cause accidents to the pedestrian (i.e., local communities). EMP to be followed.
<ul style="list-style-type: none"> <li>community safety risks due to both accidental and natural causes, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project construction, operation, and decommissioning?</li> </ul>	X		
<ul style="list-style-type: none"> <li>generation of solid waste and/or hazardous waste?</li> </ul>	X		Small amount of solid waste and construction waste is expected to be generated. EMP to be followed.
<ul style="list-style-type: none"> <li>use of chemicals?</li> </ul>	X		Drilling fluids will be used for pile driving. Use of water resistant and saline resistant chemicals during construction is also envisaged. Generators, excavators, drilling machines will use oil. EMP to be followed.
<ul style="list-style-type: none"> <li>generation of wastewater during construction or operation?</li> </ul>	X		Generation of construction wastewater is expected. During operation, a small amount of domestic wastewater from labor camp is also expected. EMP to be followed.

**Asbestos Screening:**

Screening Questions	Yes*	May be*	No	Remarks *For those with answers of <b>YES</b> and <b>MAYBE</b> , document the potential likelihood of asbestos being encountered.
<b>Does the proposed project involve, or potentially involve, any of the following activities that are commonly associated with asbestos use:</b>				
• Construction/commissioning of a new asset?	X			New academic buildings and dormitories will be constructed. However, construction materials containing asbestos will be avoided.
• Refurbishment / demolition of an existing asset?	X			Demolition is not expected. However, refurbishment is expected. Hence, existence of Asbestos in building materials is possible. An asbestos control plan will be developed along with the EMP
• Post-disaster response, involving reconstruction, repair, or removal of damaged assets?			X	
• Maritime activities?			X	
• Water supply, sanitation, wastewater, sewerage, or water hygiene initiatives?	X			Water supply lines will be installed at the new facilities. Asbestos free construction materials will be used.
• Earthworks, remedial activities, or solid waste management?	X			Earthworks are required for new construction. Asbestos control plan will be devised before commencement of construction and EMP will be followed.
• Power, telecommunications, or energy supply infrastructure?			X	No separate energy supply structure will be constructed. The existing power main will be used.
• Maintenance, demolition, transportation, or disposal of wastes associated with the above activities?	X			Earthworks materials and refurbishing spills will be transported for proper disposal. Asbestos control plan will be devised before construction and will be enforced with the EMP.

**Climate Risk Screening:**

Screening Questions		Score	Remarks <sup>8</sup>
<b>Location and Design of project</b>	Is the siting and/or routing of the project (or its components) likely to be affected by climate conditions including extreme weather-related events such as floods, droughts, storms, landslides?	0	
	Would the project design (e.g. the clearance for bridges) need to consider any hydro-meteorological parameters (e.g., sea-level, peak river flow, reliable water level, peak wind speed etc.)?	1	Yes, the project needs to consider the monsoon climate and possibilities of water logging. Planning needs to consider effective drainage system
<b>Materials and Maintenance</b>	Would weather, current, and likely future climate conditions (e.g. prevailing humidity level, temperature contrast between hot summer days and cold winter days, exposure to wind and humidity hydro-meteorological parameters likely affect the selection of project inputs over the life of project outputs (e.g. construction material)?	0	Construction work needs to avoid monsoon season. However, flooding is not likely.
	Would weather, current, and likely future climate conditions, and related extreme events likely affect the maintenance (scheduling and cost) of project output(s)?	1	Monsoon heavy downpour and extreme temperature during the summer may impact building maintenance.
<b>Performance of project outputs</b>	Would weather/climate conditions, and related extreme events likely affect the performance (e.g. annual power production) of project output(s) (e.g. hydro-power generation facilities) throughout their design lifetime?	0	Unlikely, given the nature of the building.

Options for answers and corresponding score are provided below:

Response	Score
Not Likely	0
Likely	1
Very Likely	2

Responses when added that provide a score of 0 will be considered low-risk project. If adding all responses will result to a score of 1–4 and that no score of 2 was given to any single response, the project will be assigned a medium-risk category. A total score of 5 or more (which includes providing a score of 1 in all responses) or a 2 in any single response, will be categorized as high-risk project.

**Result of Initial Screening (Low, Medium, High):** Score 2 (medium Risk project)

<sup>8</sup> If possible, provide details on the sensitivity of project components to climate conditions, such as how climate parameters are considered in design standards for infrastructure components, how changes in key climate parameters and sea level might affect the siting/routing of project, the selection of construction material and/or scheduling, performances and/or the maintenance cost/scheduling of project outputs.

### ANNEX 3: SOCIAL SAFEGUARDS ASSESSMENT

1. The due diligence, conducted in 8 target sites, screened for Involuntary Resettlement (IR) in adherence to the country's and ADB's social safeguard guidelines. The methods employed included stakeholder consultations at central and site level, site visits, and a review of secondary data, aligning with Bangladesh's policies and legal framework for social safeguarding. This involved consultations with executing agency (EA), implementing agencies (IAs), civil society organizations (CSOs), beneficiaries, and community members in 8 target divisional cities. The results of the due diligence categorized the proposed TTF-RBL program as 'C' for Involuntary Resettlement (IR) impacts according to ADB SPS 2009 as the anticipated civil works within existing campuses/boundaries of the targeted 8 sites.

2. The PSSA on safeguards and associated risks revealed that there are no anticipated adverse impacts on SEC/IP groups, encompassing tribes, minor races, ethnic sects, and local communities, within the designated program areas across the eight target sites. The proposed TTF-RBL program is Category C for SEC/Indigenous people. There is no anticipated adverse impact on SEC people by the TTF-RBL program according to the screenings conducted and national housing and census data-Bangladesh Bureau of Statistics (2010/2022) indicates that neither national/local laws nor anthropological research identify the presence of indigenous peoples, minorities, or cultural communities inhabiting or utilizing the specified program sites and adjacent areas. ADB's Safeguard Policy Statement 2009 policy principles remain untriggered, as the primary focus is on enhancing access to quality technical education and training for TVET teachers and teacher educators across all eight divisions, utilizing existing TTTC/VTI, and 33 polytechnics. During program execution, a GESI friendly action plan can be formulated as necessary, with monitoring reports generated. The TTF-RBL program aligns with national poverty reduction and inclusive growth strategies outlined in the PP2041, 8th Five-Year Plan, SDGs, and other Policy Action Plans.

3. **Indigenous peoples or ethnic population.** ADB's SPS, SR 3 recognizes that IP could be termed differently in the DMC. It also recognizes that there is no universally accepted definition of IP and goes by an identification process of IP communities impacted by an ADB funded project. For operational purposes, SPS (2009) the term Indigenous Peoples is used in a generic sense to refer to a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees: (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; (iii) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and (iv) a distinct language, often different from the official language of the country or region are.

4. The definition of Ethnic Population is used as per Ethnic Cultural Institution law 2010 of Bangladesh. The indigenous people of Bangladesh are ethnic communities in the Chittagong Hill Tracts, Sylhet Division, Rajshahi Division, and Mymensingh Division areas of the country.<sup>9</sup> It is observed that the total ethnic minority population is 1,650,159 (Men: 824,751 and Women: 825,408). Out of the total population, the ethnic minority accounts for 1.00%. Among the divisions, the highest ethnic minority population (2.99%) is noted in Chattogram, and the lowest (0.05%) in Barishal.<sup>10</sup> The tribal populations include the Chakma, Marma, Tripura, Tanchangya, Assamese,

<sup>9</sup> Government of Bangladesh, Minority Rights Group International. 2015. Dhaka.

<sup>10</sup> Government of Bangladesh, Population and Housing Census 2022, BBS. Dhaka,



Keot (Kaibarta), Chak, Pankho, Mro, Murang, Borm, Lushei, Khyang, and Khumi, differing markedly from the Bengali majority of Bangladesh in language, culture, physical appearance, religion, dress, and farming methods.<sup>11</sup>

5. The ethnic (tribal) population in Bangladesh is mainly concentrated in the three hilly districts namely, Bandarban, Khagrachhari, and Rangamati. Very low literacy rate of total rate for the males and females of ethnic population is observed as compared to the literacy rate of total population (national) level rates for both gender.<sup>12</sup> Moreover, consultation and secondary sources reveals that relative to the total population, Bangladesh has a small indigenous or ethnic population. Other than the three hilly districts, they also live in several districts (Sylhet, Rajshahi, Dinajpur, Mymensingh, Rangpur, Bogra, Natore, Khulna, Tangail, Jamalpur, Sherpur, Netrokona, Sunamganj) of Bangladesh.

6. The PSSA on safeguards and associated risks revealed that there are no anticipated adverse impacts SEC/IP groups, encompassing tribes, minor races, ethnic sects, and local communities, within the designated program areas across the eight target sites. The proposed TTF-RBL program is Category C for SEC/IP. There is no anticipated adverse impact on SEC people by the TTF-RBL program as the investigation indicates that neither national/local laws nor anthropological research identify the presence of indigenous peoples, minorities, or cultural communities inhabiting or utilizing the specified program sites. ADB's Safeguard Policy Statement 2009 policy principles remain untriggered, as the primary focus is on enhancing access to quality technical education and training for TVET teachers and teacher educators across all eight divisions, utilizing existing TTTC, VTTI, and polytechnics. Contrarily, SEC/IP, and small ethnic communities stand to gain advantages through their involvement in the contemporary TVET program facilitated by the proposed TTF-RBL initiative. During program execution, a GESI friendly action plan can be formulated as necessary, with monitoring reports generated. The TTF-RBL program aligns with national poverty reduction and inclusive growth strategies outlined in the PP2041, 8th Five-Year Plan, SDGs, and other Policy Action Plans.

7. **Land related risk and impacts on Involuntary Resettlement.** The program is committed to refraining from the involuntary acquisition of private land and ensuring there is no physical displacement of residents during the implementation of activities under the TTF-RBL program. No private land will be acquired for the program. In case of scope changes during implementation, the Program Support Unit (PSU) is responsible for notifying and closely coordinating with the Executing Agency (EA) and Implementing Agency (IA) for further actions. After thorough examination, it has been confirmed that the proposed TTF-RBL program falls under category "C" for Involuntary Resettlement (IR) impacts as all program actions will be limited to the existing available lands within the boundary of the targeted sites (polytechnics VTTI, and TTTC), that are not being used for any physical settlements or economic activities, that would trigger involuntary resettlement.

8. **Institutional capacity on Involuntary Resettlement.** Several reports and frameworks on Involuntary Resettlement (IR), prepared by TMED, were reviewed during the due diligence process for the TTF-RBL program. TMED and the DTE have successfully implemented several externally funded projects supported by EU, ILO, JICA, and the World Bank. These projects, similar in nature, mandate close monitoring of land acquisition and requisition in accordance with

<sup>11</sup> "Indigenous peoples of the Chittagong Hill Tracts". The indigenous world – Asia. IWGIA – International work group for indigenous affairs. Retrieved 11 December 2013.

<sup>12</sup> Population and housing census 2011 (national report, Volum-1, Analytical report), Bangladesh Bureau of statistics, Statistics and Information Division, Ministry of Planning.

ARIPA, 2017, as well as specific requirements outlined by the donors. Evidence indicates that both the EA and IA possess the capacity to manage IR-related issues, aligning with the Involuntary Resettlement principles of ADB SPS 2009 by engaging experts. ADB will ensure inclusion of the project EA and IA in regular safeguards capacity development activities.

9. **Identification of gaps and proposed mitigation measures:** For the proposed TTF-RBL program interventions, there will be no need for land acquisition or any Involuntary Resettlement impacts, as all civil works/infrastructure development will take place within the existing premises, thus avoiding any involuntary resettlement impacts. Participatory consultations were conducted with representatives from various groups, totaling 69 participants (approximately 35% women) in stakeholder consultations. Additionally, a consultation with industries involved 38 companies.

10. Participants included 12 high officials from IMED and DTE, 25 TVET teachers and administrators from both private and public institutes, 6 representatives from CSOs, and 42 industry representatives and associations (encompassing small, medium, and large-sized industries, along with the SME Foundation). Also, 10 current/ex-TVET students participated. The purpose of these consultations was to understand how the TTF-RBL program would ensure the active participation of key stakeholders and consider their concerns in the program design.

11. Specifically, the goal was to identify needs for capacity-building, foster partnerships, exchange views and suggestions with stakeholders, and incorporate recommendations into the proposed TTF-RBL program design. It is crucial to maintain coordination with local communities, address their expectations and concerns, and identify means to ensure that program interventions adequately reflect needs-based capacity enhancement initiatives related to Involuntary Resettlement (IR). Furthermore, it is emphasized that provisions will be in place to address any other resettlement-related grievances that may arise during implementation.

## A. Screening

### INVOLUNTARY RESETTLEMENT SAFEGUARDS

Probable Involuntary Resettlement Effects	Yes	No	Remarks
1. Will there be land acquisition?		X	
2. Is the site for land acquisition known?			Not applicable
3. Is the ownership status and current usage of land to be acquired known?			Not applicable
4. Will easement be utilized within an existing Right of Way (ROW)?			Not applicable
5. Will there be loss of shelter and residential land due to land acquisition?			Not applicable
6. Will there be loss of agricultural and other productive assets due to land acquisition?			Not applicable
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?			Not applicable
8. Will there be loss of businesses or enterprises due to land acquisition?			Not applicable
9. Will there be loss of income sources and means of livelihoods due to land acquisition?			Not applicable
10. Will people lose access to natural resources, communal facilities, and services?		X	
11. If land use is changed, will it have an adverse impact on social and economic activities?		X	
12. Will access to land and resources owned communally or by the state be restricted?		X	

## INDIGENOUS PEOPLES' SAFEGUARDS

### A. Indigenous Peoples Impact Screening Checklist

KEY CONCERNS (Please provide elaborations on the Remarks column)	YES	NO	Remarks
<b>A. Indigenous Peoples Identification</b>			
1. Are there socio-cultural groups present in or use the project area who may be considered as "tribes" (hill tribes, schedules tribes, tribal peoples), "minorities" (ethnic or national minorities), or "indigenous communities" in the project area?		<b>X</b>	There are no indigenous people (IP) are living in the program area though the TTF- RBL program sites are in eight division in Bangladesh.
2. Are there national or local laws or policies as well as anthropological research and studies that consider these groups present in or using the project area as belonging to "ethnic minorities", scheduled tribes, tribal peoples, national minorities, or cultural communities?		<b>X</b>	The investigation indicates that neither national/local laws nor anthropological research identify the presence of indigenous peoples, minorities, or cultural communities inhabiting or utilizing the specified program sites.
3. Do such groups self-identify as being part of a distinct social and cultural group?		<b>X</b>	
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?		<b>X</b>	
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?		<b>X</b>	
6. Do such groups speak a distinct language or dialect?		<b>X</b>	
7. Has such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?		<b>X</b>	
8. Are such groups represented as "Indigenous Peoples" or as "ethnic minorities" or "scheduled tribes" or "tribal populations" in any formal decision-making bodies at the national or local levels?		<b>X</b>	
<b>B. Identification of Potential Impacts</b>			
9. Will the project directly or indirectly benefit or target Indigenous Peoples?		<b>X</b>	
10. Will the project directly or indirectly affect Indigenous Peoples' traditional socio-cultural and belief practices? (e.g. child-rearing, health, education, arts, and governance)		<b>X</b>	
11. Will the project affect the livelihood systems of Indigenous Peoples? (e.g., food production system, natural resource management, crafts and trade, employment status)		<b>X</b>	
12. Will the project be in an area (land or territory) occupied, owned, or used by Indigenous Peoples, and/or claimed as ancestral domain?		<b>X</b>	
<b>C. Identification of Special Requirements</b>			
<i>Will the project activities include:</i>			
13. Commercial development of the cultural resources and knowledge of Indigenous Peoples?		<b>X</b>	
14. Physical displacement from traditional or customary lands?		<b>X</b>	
15. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, spiritual uses that define the identity and community of Indigenous Peoples?		<b>X</b>	

<b>KEY CONCERNS</b> (Please provide elaborations on the Remarks column)	<b>YES</b>	<b>NO</b>	<b>Remarks</b>
16. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by Indigenous Peoples?		<b>X</b>	
17. Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by Indigenous Peoples?		<b>X</b>	

<b>B. Anticipated project impacts on Indigenous Peoples</b>		
<b>Project component/ activity/ output</b>	<b>Anticipated positive effect</b>	<b>Anticipated negative effect</b>
1. Output 1: Inclusive provision of modern TVET teacher training expanded.	None	None
2. Output 2: Quality and relevance of TVET teacher training system strengthened.	None	None
3. Output 3: Policy environment and governance of TVET teacher development improved.	None	None

12. **Policy and legal frameworks.** The legal framework in the country, including laws, policies, and acts, is designed to safeguard people from tribes, minor races, ethnic sects, and communities or Small Ethnic Communities (SEC), encompassing tribes, minor races, ethnic sects, and local communities, thereby ensuring social safeguards. The Constitution of the People's Republic of Bangladesh solidifies human and fundamental rights for women, asserting equality before the law and entitlement to equal legal protection for all citizens (as stated in article 27). It explicitly prohibits discrimination based on religion, race, caste, sex, and place of birth.

13. The National Skills Development Policy, endorsed in 2020, places a strategic focus on marginalized groups, aiming to empower individuals by enhancing their skills, knowledge, and qualifications to facilitate access to decent employment opportunities. Furthermore, the National Education Policy of 2010 aligns its objectives with the cultivation of human values, specifically aiming to promote and develop the languages and cultures of indigenous and small ethnic groups. It also advocates for special measures to advance education in identified educationally backward areas, ensuring the continuity of national history, tradition, and culture through intergenerational processes. Additionally, the policy strives to eliminate socio-economic discrimination, irrespective of race, religion, or creed, and works towards eradicating gender disparity within the educational system.

14. The Persons with Disabilities' Rights and Protection Act, enacted in 2013, aligns with the commitments outlined in the United Nations Convention on the Rights of Persons with Disabilities (CRPD). By removing barriers, this legislation empowers individuals with disabilities to live their lives on par with their non-disabled counterparts. It ensures unfettered access to various societal amenities, encompassing infrastructure, communication, transportation, information, and technology. Moreover, the Act safeguards persons with disabilities, guaranteeing them equitable treatment, the enjoyment of their rights, and access to government-provided facilities.

15. Furthermore, the peace accord signed in 1997, promised to bring stability and development to CHT<sup>13</sup> region. According to the peace accord, enactment of the three revised Hill District Council Acts and Regional Council Act, and Hill District Local Government Council Acts

<sup>13</sup> The three hill districts of Rangamati, Khagrachari and Bandarban in the Bangladesh are collectively known as the Chittagong Hill Tracts (CHT).

of 1989” (Acts XIX, XX, XXI of 1989). These three acts established autonomous bodies known as Hill District Councils in the three districts of the CHT as well as the establishment of Ministry of CHT Affairs. Chittagong Hill Tracts Regional Council is the local government body responsible for the welfare and administrative operations in CHT.

16. **Institutional capacity:** At the apex of the hierarchy, the Ministry of Education, led by a secretary, serves as the overarching executing agency. TMED is tasked with establishing a Project Steering Committee (PSC), chaired by the Secretary of the Ministry of Education, and comprising representatives from implementing agencies (polytechnics, VTTI, TTTC) and other stakeholders. This committee's mandate is to ensure the project attains its outcomes, outputs, and targets while addressing any implementation issues that may arise. Concurrently, DTE will establish a distinct Program Support Unit (PSU) responsible for overseeing program activities and outputs. The PSU will play a crucial role in facilitating, coordinating, and monitoring the progress of the TTF-RBL program's implementation. Additionally, the PSU will be provided with capacity building to enhance skills in addressing and resolving issues related to program implementation. If challenges prove insurmountable at the PSU level, they will be elevated to the PSC for resolution.

17. Programmatic risks. The examination and findings of the PSSA demonstrate the full alignment of the proposed TTF-RBL program with ADB's Safeguard Policy Statement. Through stakeholder consultation, several issues related to inclusiveness and social safeguards, particularly concerning SEC/IP, were identified and addressed during the program's design. Identified issues encompass the target percentage of SEC/IP teachers, the establishment of a selection criterion prioritizing SEC/IP, GESI-friendly initiatives, capacity building of the IA on managing social safeguards, and monitoring/reporting of SEC/IP issues. By addressing these elements, the proposed TTF-RBL program can achieve greater comprehensiveness, leading to maximum benefits for beneficiaries. The PSSA identified specific areas under each output that enhance the inclusivity of the TTF-RBL program, as follows:

18. The implementation of initiatives, including the modernization and expansion of TVET teacher training facilities, as well as the promotion of inclusive access to blended TVET teacher training in eight divisions under Output 1, 'Inclusive provision of modern TVET Teacher training expanded,' will occur within the existing premises of the targeted polytechnics, TTTC, and VTTI. However, throughout the construction, expansion, and operationalization phases, the proposed TTF-RBL program should consider establishing physical infrastructure that is friendly to differently abled persons to enhance mobility and accessibility. The proposed TTF-RBL program will undertake necessary efforts, such as consulting with beneficiaries, addressing social barriers, and raising awareness, to ensure that the targeted percentage of SEC/IP teachers and students have access to facilities and equipment for blended TVET teacher training. Additionally, addressing provisions such as transportation and stipends is crucial to encourage teachers and students from disadvantaged groups/SEC to successfully complete TVET teacher training.

19. Actions like curriculum modernization, TVET teacher recruitment, TVET teacher training, training of teacher educators, industry linkage, continuous professional development, and stipends under the output-2 "Pedagogy and skills of TVET teachers and educators in modern and emerging technologies enhanced" will be implemented across all eight divisions through existing polytechnics and TTTC & VTTI. Consequently, operational activities are not anticipated to elevate the risk of increased social impacts through interactions with other activities. However, during the development/ updating of the curriculum and TVET teacher recruitment, the proposed TTF-RBL program will ensure cultural appropriate measures to ensure SEC/IP or small minority groups are heard, enhancing inclusivity in the curriculum and recruitment process through consultation with the relevant stakeholders.

20. Furthermore, actions like TVET teacher management, and development system enhancement, action plan formulation, training programs, monitoring, and evaluation under the output-3 "TVET teacher management, development, and reporting system improved" are not expected to heighten the risk of increased social impacts through interaction with other activities. It is noteworthy that the PSSA revealed the in-house capacity within the EA and IA to manage social safeguards issues that are adequate for the low-risk program interventions. However, ADB will continue to engage with the EA and IA and enhance staff capacity to assist the EA and IA in effectively managing social safeguards during policy formulation, training programs, monitoring, and evaluation.

21. ADB's commendable safeguard track record in education operations in Bangladesh positions it to provide expert advisory support to the PSU during the implementation of the TTF-RBL program. Finally, the PSSA and SEC/IP screening reveal that the programmatic risks associated with adverse social impacts are not expected to be triggered for this program.

22. The development partners endorse the safeguard policies of ADB and the World Bank to foster full respect for indigenous peoples' identity, dignity, human rights, livelihood systems, and cultural uniqueness, as defined by the indigenous peoples themselves, so that they (i) receive culturally appropriate social and economic benefits, (ii) do not suffer adverse impacts as a result of projects, and (iii) can participate actively in projects that affect them.



## **B. Stakeholder Consultation**

23. **Summary of the stakeholder consultation.** A total of 69 participants (approximately 35% women) took part in the stakeholder consultation in Khulna. This group comprised 6 high officials from IMED, 6 higher officials from DTE, 25 TVET teachers and administrators (from both private and public institutes) across various polytechnic institutions, VTTI, TTTC, 6 representatives from CSOs, 4 industry representatives and industry associations, and 10 current/ex-TVET students. The selection criteria prioritize participants from Indigenous people (IP), disabled individuals, and those with poor and vulnerable backgrounds. The purpose of the consultation was to understand how the program would ensure the active participation of key stakeholders and consider their concerns in the program design. Specifically, the aim was to identify the needs for capacity-building partnerships, exchange views and suggestions with stakeholders, and incorporate recommendations into the proposed TTF-RBL program design. And this has been also assured to the stakeholder participants during consultations.



24. In addition to this, a consultation with industries was conducted during the project design period. A total of 38 companies participated in the consultation, with 11 of them, including small, medium, and large-sized industries, and the SME Foundation (an apex institution for SME development by the Ministry of Industries), participating in informal consultations. The remaining 27 companies participated in the survey. The purpose of the industry consultation was to determine possible partnerships with teachers from TVET institutes, understand the needs for technical solutions related to modern and emerging technologies, and assess the feasibility and conditions for industry-based teacher training. Various methods were employed to engage with industries for consultations, including virtual platforms, written records, face-to-face discussions, industry visits, surveys, and a detailed plan was developed outlining the consultation process, questionnaires, and reporting.

25. Group specific views, insights and recommendations are as follows:


Stakeholders		Purpose, views, insights, and recommendations
TVET Students (current and past)		<p>The purpose of the TVET students' consultation is to understand needs and form of support for the underprivileged TVET students to pursue their career of complete TVET programs. Furthermore, to identify availability of resources, need for refurbishment and equipment for training, gaps of applied research in the current TVET system that are required of TVET students and future TVET teachers.</p> <p>During the consultation, the TVET students (current and past) stated that:</p> <ul style="list-style-type: none"> <li>• The English language serves as one of the key barriers for Indigenous people (IP) and those with poor and vulnerable backgrounds to engage themselves as TVET teachers or professionals.</li> <li>• Current TVET students feel discouraged from choosing TVET teaching as a profession due to the observed misbehavior, poor morality, and lack of ethical values among existing TVET teachers in both private and public sectors. Furthermore, students have also reported that their teachers are not able to serve as good human beings or role models.</li> <li>• In many cases, TVET students receive practical/lab classes conducted by lab technicians who lack a technical or engineering background. Very few TVET teachers conduct lab classes, with the majority focusing on theoretical classes.</li> <li>• There is a lack of monitoring systems to track TVET teachers' class conduction after receiving training, especially when the training is intended to improve the quality of teaching.</li> <li>• Difficulty arises in finding qualified TVET teachers from indigenous people, disabled individuals, and those with poor and vulnerable backgrounds, as these groups are often less respected in society, contribute less to decision-making processes, and may hesitate to express their opinions when necessary.</li> <li>• Limited access to the industry for practical or on-the-job technical training is a challenge for those from poor and vulnerable backgrounds due to factors such as poverty, remoteness, poor transport facilities, lack of representation, poor communication skills, and a lack of confidence.</li> </ul> <p>The student group recommends the following:</p> <ol style="list-style-type: none"> <li>1. Implement a strong monitoring system in classrooms so that students from poor and vulnerable backgrounds can benefit maximally from trained teachers, who will be equipped with training on 4IR.</li> </ol>




Stakeholders		Purpose, views, insights, and recommendations
		<ol style="list-style-type: none"> <li>2. Assign TVET teachers to projects alongside students so that both parties can take ownership of the project outcomes, providing TVET students with additional learning benefits.</li> <li>3. Recruit lab technicians from engineering backgrounds to ensure that TVET students, including those who are poor and underprivileged, receive training from experts.</li> <li>4. TTTCs/TVET centers can assist students in finding valued employment opportunities.</li> <li>5. During training, determine stipends based on the socio-economic context of TVET teachers and students.</li> </ol>
		
<b>TVET teachers and administrator (including TMED and DTE)</b>		<p>Pictures of consultation with past and existing trainees.</p> <p><b>The purpose</b> of the TVET teachers' consultation is to understand needs and form of support for the indigenous and poor or vulnerable background TVET teachers to pursue their career as TVET teachers. Furthermore, to identify availability of resources, need for refurbishment and equipment for their career path in the current TVET system that are required TVET teachers.</p> <p>During the consultation, the TVET teachers stated that:</p> <ul style="list-style-type: none"> <li>• Public perceptions toward technical education are poor, as parents prioritize general education and its certificates over technical education.</li> <li>• Only a small percentage of youth participate in TVET programs, and those who complete such programs often feel isolated, as society does not value TVET certificate holders. As a result, the younger generation has limited opportunities to engage with their communities, and TVET graduates face challenges in accessing job information.</li> <li>• Poverty is a significant hindrance to choosing a career as a TVET teacher, as many graduates immediately engage in traditional jobs like auto-mobile garage work and electrical work.</li> <li>• Technical education has yet to be recognized in society as a dignified job,</li> </ul>



Stakeholders		Purpose, views, insights, and recommendations
		<p>especially among indigenous people (IP) and those from poor and vulnerable backgrounds. Parents often believe that skills can be acquired through practical experience and learning by doing, making the choice of becoming a TVET teacher beyond their imagination.</p> <ul style="list-style-type: none"> <li>Furthermore, VTTI, TTTC, and Polytechnic institutions have limited facilities to provide access for disabled individuals as both students and teachers.</li> </ul> <p>During consultations with TVET teachers and administrators, several recommendations were made: (i) consider criteria for selecting TVET teachers that prioritize indigenous people (IP) and those from poor and vulnerable backgrounds; (ii) ensure that training accommodations are safe, secure, and friendly for disabled persons and indigenous people; (iii) provide financial incentives to cover family relocation costs; and (iv) implement motivational and awareness programs to increase the participation of women, indigenous people, and those from poor and vulnerable backgrounds in TVET programs as both teachers and students.</p>
		
		Picture: Consultation with teachers
Employers		<p><b>The purpose</b> of the employers' consultation is to collect information, ideas, opinions, and insights from a wide range of industries to determine the strategies, activities under the TTF program. Furthermore, the consultation will provide clear understanding about the partnerships among TVET institutions and industries by analysing gaps, challenges, and opportunities for the indigenous and poor and/or vulnerable background TVET teachers.</p> <p>The industry consultation revealed the following key points:</p> <ul style="list-style-type: none"> <li>Small-sized industries were found to manually manufacture their products across all five technology areas. Medium-sized industries, on the other hand, employ automated/technical solutions with a human touch for their existing productions.</li> <li>SMEs and large-sized industries are actively seeking support from various TVET institutes for tasks such as testing production, recruiting talents,</li> </ul>

Stakeholders		Purpose, views, insights, and recommendations
		<p>maintenance, installation, and certification. Most companies have in-house experts but invest in building their capacity through in-house training. They acknowledged a shortage of experts, particularly those experienced in modern technology, both within their own companies and in Bangladesh.</p> <ul style="list-style-type: none"> <li>• SMEs and large companies are in the process of adopting new technologies/machineries to expand their income. However, they face challenges in acquiring in-house and external experts for the production process.</li> <li>• The SME Foundation's current priorities include promoting modern technology, raising awareness, and providing training on enterprise development and addressing policy anomalies prejudicial to the legitimate interests of SMEs.</li> <li>• Most consulted companies have partnerships with Business Associations/Chambers, different polytechnic institutes, and TVET institutes for industry attachment training for both teachers and students.</li> <li>• Some companies lack systemic industry-based training for TVET teachers and students but facilitate study tours and provide training in polytechnic institutions' classrooms.</li> <li>• Consulted companies expressed the need for industry attachment training to grow their business but struggle to develop partnerships with Polytechnic Institutes and TTTCs/VTI.</li> <li>• The industry lacks awareness about NTVQF or other BTEB-approved competency standards, relying on practical skills testing for technician recruitment.</li> <li>• Companies provide industry-based training to TVET teachers and students without a specific curriculum, highlighting the recommendation for a structured curriculum for such training.</li> <li>• In the survey involving 27 companies, almost 100% of respondents expressed the usefulness of the RBL program for teachers and emphasized the various ways teachers could contribute to improving the industry's productions and services.</li> </ul> <p>Employers/Companies' recommendations include:</p> <ol style="list-style-type: none"> <li>1. TVET teachers require industry-based training for 15 days to one month.</li> <li>2. Companies willing to accommodate trainees based on the TVET institutes' requirements.</li> </ol>

Stakeholders		Purpose, views, insights, and recommendations
		<p>3. Many companies mention the availability of in-house experts to facilitate TVET teacher training.</p> <p>4. Employers/Companies' conditions for providing industry-based training to TVET teachers include:</p> <ul style="list-style-type: none"> <li>✓ Financial support.</li> <li>✓ Business confidentiality.</li> <li>✓ Maintained safety and security of the factory premises.</li> <li>✓ Opportunities for learning from various locations in Bangladesh, not limited to a specific polytechnic institute.</li> <li>✓ Adherence to industry rules and regulations.</li> <li>✓ Learner's screening process to be done by the industry based on their demand.</li> <li>✓ Opportunities to increase the brand value for both parties.</li> </ul>
		<p>Picture: Consultation with Employers-industry, etc.</p>
<p><b>Community and CSO</b></p>		<p><b>The purpose of the community and CSOs' consultation</b> is to collect information, opinions and insights and gather solicits views and suggestions from vulnerable communities. The community and CSOs have pointed out the following issues:</p> <ul style="list-style-type: none"> <li>• TVET teacher recruiters face significant challenges in securing qualified teachers, particularly those with practical skills or the ability to demonstrate them.</li> <li>• Parents and family members discourage engagement as TVET teachers due to lower payment. For instance, a qualified technical person, such as an engineer, receives a higher salary than a teacher.</li> <li>• Private TVET institutions encounter challenges in obtaining qualified teachers due to job uncertainty (project-based) and societal acceptance issues, especially for female teachers.</li> <li>• Lack of awareness among parents about TVET and job opportunities.</li> <li>• Indigenous people (IP), disabled individuals, and the poor are inherently less empowered to raise their voices. They are also less equipped to express themselves, feel shy, and lack confidence due to their socio-economic background.</li> <li>• Early marriage and multiple marriages are predominant factors that deter participation in TVET training and teaching.</li> </ul>

Stakeholders		Purpose, views, insights, and recommendations
		<p>In response to these challenges, the community and CSOs recommend:</p> <ol style="list-style-type: none"> <li>1. Inclusive program design, considering access for comparatively lower-performing teachers, 4IR training for teachers from private TVET institutions, and provisions for female TVET teachers.</li> <li>2. Advantaged communities will benefit from the proposed RBL program through the inclusion of private TVET teachers in 4IR training.</li> <li>3. Provision for partnerships between private and public VTTI/TTTCs to facilitate access to 4IR training for private TVET teachers.</li> </ol>
		
Picture: Stakeholder consultation		Consultation with NGO/CSO
		Consultation with the officials of IMED and DTE

26. It has been confirmed to the participants that the outcomes and recommendations from the consultations will be reflected in program design. While implementation and development of various program scopes, the proposed program will continue consultations with beneficiaries, addressing social barriers to the SEC/IP, differently abled and vulnerable persons and raising awareness among TVET teachers and students.