

Consultative Feedback on the PRSP in Bangladesh: Making the PRSP Child-Sensitive

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February 16, 2005**

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Overview

We welcome the prominent place awarded to children's rights and advancement in the PRSP as a reflection of the Government's already demonstrated commitment to children. However, overall we would wish for children's rights and advancement not to be left as a separate issue, but for the need to improve the situation of children in Bangladesh to be recognised as fundamental to poverty reduction and for the impact on children of all policy options to be considered before decisions are made. **In this regard, it is imperative that the PRSP include a clear definition and analysis of childhood poverty as separate from adult poverty.** This analysis must disaggregate between different groups of children through using both quantitative and qualitative child focused indicators. The qualitative indicators should focus on the psychosocial effects of child poverty.

Bangladesh already has the beginnings of a children's rights policy framework. This includes the National Action Plan for children, the Plan of Action Against the Sexual Abuse and Exploitation of Children including Trafficking, and the Education for All: National Plan of Action II and the Concluding Observations of the CRC. Government's commitments in these areas should be fulfilled using the PRSP. These plans need to be explicitly linked with the PRSP as part of their implementation with a mid term expenditure review/three year rolling plan.

In the various policy matrices relating to children, there is an attempt to list various responsible agencies for each action item. However, the agencies listed in this column need to be thought through more. Community organisations (COs) are mentioned occasionally, but not consistently. *The COs and NGOs that are currently doing work in the areas outlined in the PRSP must be mentioned in the column.* In addition, many of the target areas do/will include multiple responsible organisations. *For effective implementation, a lead organisation must be clearly identified. Also, the workload responsibilities must be clearly divided amongst all parties.* This may require negotiation amongst the parties prior to implementation of the PRSP.

There is some fear that the PRSP as laid out by the government is too ambitious and therefore not achievable by 2007. This would be easily recognized if the matrix included a 'Time Frame' column with specific month targets for each activity. **Alternatively, clear priority areas need to be set and focused on.** We suggest the areas of:

- 1. Coherent, free and quality primary education system accessible to all children**
- 2. Free primary health care**
- 3. Mechanisms to protect children from abuse and exploitation**
- 4. A society which listens to children and prioritizes their rights**

OVERVIEW RECOMMENDATIONS:

1. Children's Rights Across Sectors

As acknowledged in the body of the PRSP text, all policies affect children and children's considerations should not be relegated to policy aimed directly and exclusively at children. The Government needs to develop a comprehensive multi-sector approach to Children's Rights and develop guidelines.

We are pleased that PRSP identifies the need to bring domestic legislation in line with the CRC, however, this is not reflected anywhere in the Matrix. This needs to be explicitly stated.

2. Linking PRSP to National and International Commitments

Stronger links must be made between the PRSP and the beginnings of a child rights policy framework that Bangladesh already has in place. The PRSP should be, essentially, the implementation strategy of these frameworks.

3. Information on and for Children

Data collection is a precondition of many of the activities of successful PRSP implementation but it is not listed as an activity in all areas (i.e. HIV/AIDs, Adolescent Health, etc.). Similarly, rights and information awareness should be promoted across all sectors for children.

Statistics given throughout the PRSP need to be given specific references.

4. Priority of Children's Directorate

Although we welcome the promotion of a Human Rights Commission and the promotion of a 'meaningful office of the Ombudsman', and "strengthening monitoring of child rights and child welfare", we are concerned that the establishment of a Children's Directorate doesn't appear in the matrix.

5. More Focus on Children who are the Most Marginalized

The children who are most marginalised, (from ethnic or religious minorities, children who are living in char, hoar, children living in tin bigha corridor, children of river gypsies, refugees, etc.) are most vulnerable and need to have top priority across the PRSP policy areas. Currently, the PRSP does not provide specific focus to vulnerable groups. For example, refugee children are not mentioned at all in the PRSP and the section on Tribal People is very short despite their unique needs. In addition, in at least two places in the PRSP there are strategies outlined to combat poverty for marginalized groups but the strategies proposed appear to be against the principles of participation and respect. (i.e. The PRSP recommends that Gypsy people should be given land to settle down. There is no evidence presented that the Gypsy people were consulted about what they want and this is what they recommended.) *Please note that the term "Tribal People" needs to be checked to ensure that this term is accepted by the people it is intended to encompass. Even if this term is acceptable, in the PRSP the term is incorrectly shortened to TP in some places and should be corrected .

Education

In the section on education, we cannot emphasise enough the importance of **free, quality, primary education** . The current quality of education is low and reduces pass rates and future employment prospects. Because children and parents realise all too well the limited return on education, children will be withdrawn from school and put into occupations which are perceived to provide them with better immediate and longer -term prospects. Poor quality education thus contributes to school drop out and child labour, including its more harmful manifestations. We would question the effectiveness of current modes of non -formal education targeted to poor and working children.

PRIORITIES:

1. Make formal schooling accessible for all children:

We would urge the government to ensure that mainstream primary education is made accessible, relevant and enjoyable to these children, rather than the current choice between a second class formal and a third class informal schooling.

2. Decentralization of Education System

Decentralization of education administration (including data collection) and planning is mentioned in the PRSP, but without sufficient emphasis or details i.e. involving schools, teachers, communities and children or clarifying adequately roles and responsibilities at each level. What is needed is a concerted 5 -year plan in which the finance and oversight of educational development is decentralised at regional levels so that decision -making and accountability for decisions moves closer to the community. Legislative and normative control would be retained at the central level (i.e. design of teacher qualifications and standards should be defined at the national level; however, local discretion must be permitted in the implementation of such standards if the education system is going to recover the dynamism necessary to address the problems that have beset it. *The first step is to bring together at the*

regional levels the UP chairman, parents, teachers, students, Upazila education officers, early school leavers, and other interested parties to discuss and prioritise the education issues they face.

3. Children's Participation

Children must be involved as full and equal members on School Management Committees and on all education issues. Parent -teacher meetings should be compulsory.

4. Financing Schools with Collaboration

Linking education financing for schools to their performance will only serve to provide greater funding for top schools and discriminate against those schools who most need additional resources. This is not a good solution. Financing of schools should go from the Union Parishad through three channels: School Management Committee, Union Parishad, Upazila Education Committee.

5. Strengthen EMIS and Community involvement in the Planning and Monitoring System:

National education planning is currently based on inadequate data provided by the EMIS and this is not mentioned in the PRSP. EMIS needs to be strengthened in order to collect good data and thereby providing good information to education planners. The existing monitoring system can be strengthened or it may be expanded, i.e. the Union Parishad Education Standing Committee can be involved in monitoring the schools in their constituencies, exchange (within the government sector), INSETT and *promoting community involvement in monitoring education and developing proper indicators (currently only mentioned as measuring the quality of girls and boys schools)*. Also, government needs to fulfil its responsibility in monitoring private schools as, contrary to the position taken in the PRSP, there are a flourish of poor quality private sector schools.

6. Review of the Cash for Education programme:

The Cash for Education programme helps some of the house hold to overcome the barriers of indirect education costs but needs to be carefully reviewed as a core component of education. It needs to be tailored to better reach the poorest by changing the requirements around attendance and marks achieved. These requirements exclude children who can't come regularly or achieve high enough marks (including working children). It must be considered alongside other activities for improving education in order to address the fundamental quality related issues for which children avoid going to school and issues of unmotivated teachers. In addition, an appropriate strategy needs to be developed to reduce the high cost of education at non-government institutions especially in urban areas . Moreover the system must be changed to allow working children to attend school. Piloting a community based mechanism to follow up both fulltime and seasonal working children could be a possibility.

OTHER:

Holistic Approach:

While quality education is an important contribution to addressing poverty, it can not do this by itself or in isolation from other basic services. The text puts forward education (4.J) as the sole effort which can achieve poverty reduction but this needs reconsideration.. In addition, a serious effort needs to be made to ensure transfer of quality approaches from the NGO sector to the government sector where they could truly impact on a large scale .

Achieving Quality Education:

Page 156 it mentions that quality of education is determined by: ' family circumstance...., parents ability to provide tutoring' - this is inaccurate as neither factor are preconditions to the delivery of quality education in school. These points unfairly pass the blame (and financial burden) back onto the families.

Methodology:

Learning methodology needs to be changed. Too much emphasis on memorisation to be changed to greater comprehension, creativity and use of information – this requires a change in the methods of evaluation as well.

In addition to devising a competency test for end of primary, there is a need to revise all assessment methods in the primary cycle as exams remain inappropriate for the most part.

Integrated and Equitable Education:

Equivalence of qualifications and education standards need to be implemented, and a common core curriculum in the medium term and through unification of the education system in the longer term.

Gender:

There is very little concretely proposed in relation to gender in education - and what is there is simply understood as girls' education. For example, it has been reported that there is an increasing issue of boys performing less well than girls in primary/secondary schools which does need to be at least acknowledged.

Inclusive Education:

Primary school teacher training must include a component on how to create an 'inclusive' education environment for children, all schools should have a plan on how to deal with children who are developmentally challenged and to promote the inclusion of children from ethnic minorities, more teachers should be recruited from their own community. Government should NOT be seeking to financially support NGO schools for disadvantaged groups (page 160) but should seek to have inclusive government schools. Reasons for children dropping out amongst marginalized groups must be analysed separately from mainstream children.

Also, it is unclear what the role of a GAD cell in the NCTB is - simply to revise curriculum with a gender perspective? If so, what about other differences - ethnic groups disability etc?

Involving Teachers

Teachers' right to be remunerated for their work should be acknowledged and unified pay structures need to be established. Also, local teachers should be hired. We would suggest a statutory role in local government for teachers, possibly through union parishads.

Also, introduce training on effective communication skill for all teachers at primary and secondary level.

Page 160 mentions 'a rationalised system for teacher placement'. The term 'rationalisation' is one that is jargon that means closing small rural primary schools in a bid to make more 'effective' (and less child friendly) schools

Private tutoring needs to be curtailed - a student should only be allowed for private tutoring when he/she is facing problems. Teachers are to ensure that most children are capable to complete their tasks in school.

Prevention of Violence, Abuse and Demoralisation:

Physical violence is recognised in the PRSP but not psychological which is more damaging to children in education institutions including schools. Teachers need to develop alternative methods for classroom management.

Introduce psychosocial counseling service at all primary and secondary level education.

Linking Cognitive Development with Education

Stronger links need to be made between nutritional needs and education. Children will only be able to receive the full benefits of an education if their nutritional needs are met.

ECD:

Primary education system should be equipped with facilities for providing support on early childhood development – ECD should be supported financially by local government

Health & Nutrition

Overall, the strategies for ensuring access to health care are well thought through and would have a tremendously beneficial impact on children's welfare and prospects if implemented. However, we are concerned that an over-reliance on non-government services providers with inadequate regulatory capacity in government will lead to a reduction in quality and an increase in direct and indirect costs of accessing health care. On the contrary, government should retain its role, alongside private and non-governmental providers, and be equally as accountable and transparent for delivering essential health services to the poor, particularly women and children.

If the spread of HIV/AIDS is to be prevented among adolescents (page 141), it will be necessary to ensure that health services and information are accessible to adolescents in a non-threatening environment [in the Thana Health Complexes or MCWCs – currently the Marie Stopes Clinic Society (MSCS) has been given the responsibility to try out 10 MCWCs for Adolescent Friendly Health Services but it has not taken shape].

Malnutrition is one of the most significant threats to child development currently in Bangladesh. As such, we believe a much stronger emphasis must be given in the PRSP to this issue. Current measures aimed at combating malnutrition are inadequate and evidence does not support the effectiveness of the approaches currently adopted.

PRIORITIES:

1. Adolescent friendly services

AFS should be treated as a top priority by all providers. An adolescent health strategy needs to be drafted and implemented. This strategy needs to include more than just training of the providers, but also things such as increased accessibility/referral mechanisms, proper timing, affordability, quality, programme design and monitoring by adolescents etc. (Responsibilities in this area need to include Bangladesh Shishu Academy).

2. Focus on Working Children

Develop a targeted health service package for the working children and available for them; establish yearly health check up, nutritional and health assessment for adolescents, including working children supported by the institutions/employers; formulate and monitor policies to protect reproductive health rights of the working children with the employers association/employees, Increase awareness raising about the information on services through child sensitive media, and popular theatre, increase awareness of working children on reproductive health and nutrition issues;. Responsibilities should include Bangladesh Shishu Academy, MWCA, BGMEA, Employer's Associations.

3. Governance and Co-ordination:

We would recommend the establishment of a nutrition co-ordination cell with an inter-sectoral remit to ensure co-ordination and maximisation of impact of a variety of nutrition-related interventions, such as increased household income, women's empowerment through education, literacy, elimination of gender discrimination (girl child), women's control over household resources and access to safety net provisions implemented by various line ministries. In addition, while private and non-governmental providers are both important in ensuring truly widespread coverage, it is essential that government retain its role in the provision of health services.

We need to re-design the nutrition programme and integrate it with health and other relevant sectors. We must establish a strong monitoring and evaluation component of both the health and nutrition programmes – a separate body or institution/s may be engaged to have neutral information and transparency of the programme achievements for adjustments. Further

improvements or changes to the health and nutrition programmes could come through a national expert advisory body accountable to government, donors, children and civil society. Responsibilities need to include Bangladesh Breast Feeding Foundation, Bangladesh National Nutrition Council, MLGRD&C and City Corporations (Urban)

OTHER:

- Age gap - the 6-9 age group is largely missing in the health and nutrition sections.
- Domestic violence – has a direct impact on health. It causes around 10% of maternal deaths which is one of the direct contributors of MMR but also indirectly hampers normal development of the child in the mother's womb.
- Specific health and safety issues of children in different geographical locations, regions (like hill tracts, rural areas) like snakebites, injuries from wild animals, etc., should be addressed
- Primary health care should be strengthened in addressing topical diseases
- Indicators should be segregated by gender and geographical area
- Community-based psycho-social support structure needs to be available to children including specific provisions for counselling services for children in government health care centres
- The text included CNU expansion issue but it is missing in the matrix. To rehabilitate and manage the severely malnourished children we need to establish an appropriate protocol adapted to the rural and urban setting.
- School-feeding - is a short term measure that may increase the enrolment and attendance in schools but the programme's role in addressing malnutrition among the school children has not been adequately proven. School feeding programmes should be seen as one component of a comprehensive strategy to tackle malnutrition.
- Improve child and mother's health - the target is under 5 but in the action the matrix included School Health Services. In future priorities - we can add: Increase full immunisation coverage (Child, adolescents and mother); Increase caregiver's knowledge on early childhood (conception - 5 years); Further strengthening of facility based and community based IMCI; Develop pro-poor national drug policy; Display clients charter of rights in all the facilities; Undertake more concrete steps to produce skilled health technologists. Under responsibilities, include MWCA (MMR is also related to women facing domestic violence).
- Reproductive health - Client segmentation on the basis and ensure specific services: further expansion of SBA (GoB/Private/NGOs/CBOs); strengthening EoC facilities (first aid, basic and comprehensive) as women friendly and responsive centres; develop policy for the working women to support her maternity expenses (demand side financing Scheme!) for the 1st two child with minimum 3-5 years gap (breast feeding child's right protection and addressing reproductive right of the mother). Responsibilities should include MWCA, Bangladesh Shishu Academy.
- **Mother and child nutrition**--The current nutrition programme intervention relies on the improvement of mother and child caring practices, and thus focuses on growth monitoring and promotion through supplementary feeding, but has been found to be ineffective alone. Simultaneous efforts need to be in place to, for example, ensure household food security, access to affordable quality health services including sanitation, etc.
- a policy needs to be adopted for preventing interruptions of the nutrition programme interventions or a long term programming. We should establish referral centres for treating and rehabilitating severely malnourished children, women and lactating mothers. Increase awareness among the caregivers and lactating mothers on the importance of exclusive

breast feeding appropriate and adequate complementary feeding after 6 months up to 2 years

- Food quality & access safe food for all: we need to increase access to information/awareness on safe, secured and nutritious food through mass media and education materials; strengthen monitoring through functional coordination between the Sanitary Inspector (MOH&FW/DGHS) and the Food Inspector (MOF) and effective enforcement of regulation related to food safety and security issues including their accountability with clear delineation of their roles and responsibilities; introduce a policy for the hard core poor or women headed household or disadvantaged family who could access fortified food free of cost (Atta and Cooking Oil and Iodized salt etc. responsibilities could include WFP, MLGRD&C, NGOs/CBOs); control food adulteration; enforcement of law against tinned food advertisements and promotion; encourage families to home garden, rear poultry, promote fish culture supported through existing line department and crop diversification activities; increase awareness about safe and secured nutritious food item preparation and consumption; encourage private sectors and business communities to establish Food Fortification Plants and development of distribution system. Responsibilities should include WFP, Consumers Association of Bangladesh(CAB), MLGRD&C, MWCA
- Health governance and finance: In future priorities column it has been suggested to create an Academy: *Establishment of National Academy for Health and Population Management* which is not at all going to impact on the poor people rather will be creating another white elephant in the health system. Instead, we should strengthen the capacity of Bangladesh Shishu Academy(BSA) and Child Right's organizations e.g., as Manuser Jonno as the facilitating body for the BSA. Responsibilities should include MCWA, MOHFW, MOL, MOInf, MOE, Bangladesh Shishu Academy.
- Improve school health services (in the child rights matrix) and provide health training on orientation of worm infestation, supply of iron folic acid tablets for school girls etc; also, train providers on de-worming children; ensure supply of anthelmintics to institutions/community settings and develop a mechanism for monitoring of distribution (2 rounds a year through directly observed method of swallowing on the spot); ensure supply and distribution of IFA among the girls (Iron and Folic acid) through the existing health and educational institutional outlets

Protecting Children

The problem of violence against children is probably one of the greatest unrecognised issues affecting children. There needs to be a clear link on how child sexual abuse, exploitation and trafficking, physical and psychological punishment are linked to child poverty. **Children living in poverty are more vulnerable to certain form of abuse and exploitation, and in order to address child poverty we need to have a better understanding on how child poverty and child protection issues are inter-linked.** We simply do not know the extent of abuse and neglect currently prevalent. However, the state can contribute to addressing these issues by:

1. Assessing the Magnitude of the Problem

Terminology must be clearly defined and used explicitly. If the issue is sexual abuse or sexual harassment, these terms should be used and not hidden under a generic term 'violence'. Once the terminology is clear, an assessment of the current extent of abuse and neglect should be undertaken. This will *partially* involve a concerted campaign to assess the magnitude of the problem and increase public recognition of it, which is covered in the body of the PRSP but not in the matrix. In addition, a review should be undertaken to assess the implementation of the NPA on the protection children from sexual abuse, exploitation and trafficking.

2. Promoting Children's Rights to Protection and Changing Adult Behaviours

Prevention of abuse and exploitation - undergo massive awareness raising campaigns, targeting families, of the right of children to dignity and respect including their right not to be

physically punished (legal right, after changing legislation). Future priorities could include: continue awareness raising campaigns promoting the rights of children; undergo massive parenting campaigns to promote increased communication with and respect for children and promoting other forms of child correction

3. Developing a Community Response

Community structures need to be in place to deal with violence, abuse and exploitation of children. Developing community response to violence must include ALL members of the community (i.e. political members, adults with and without children, children, NGOs, businesses) – awareness raising of the benefits for everyone of a safe community for all but with specific focus on teachers and employers as they are the ones that spend the most time with children.

In addition, a large number of children grow up on their own without being cared for by parents or are isolated from parental care. These children currently have to fend for themselves without protection. Protection systems for these children must be designed, with their involvement, to assist and support them in a way that protects and promotes their rights. Adoption rights of children are not mentioned in the child rights matrix – in the women's advancement section, there is mention of adoption as a future priority.

OTHER:

- Children themselves say that efforts must be made to ensure that boys are not idle and are encouraged to seek education, employment and recreational activities.
- Birth registration – the target should be 100% of children born in 2007 and beyond are registered. This will need to include UNO/DC, Civil Surgeons, birth attendants and registry personnel, and other local government administration.
- There should be specific support structure for abused children, early pregnant mothers
- In the text, 5.370, there is mention of building 'open house' shelters for street children in the urban areas where street and working children can take rest, bathe, wash their clothes, play, be entertained, etc. – this is not mentioned in the matrix
- **Transportation** – the safety of children in relation to transportation is mentioned in the child rights section but nowhere in the specific section on transportation. Child-friendly transportation solutions must be specified i.e. ticketing systems, seating systems, etc.

Children in contact with the judicial and social welfare systems

PRIORITIES:

1. Restoring the Spirit of the 1974 Children's Act:

Where reference is made to children in the juvenile justice system, it is important to note that children need to be treated entirely separately and differently from adults and that the justice and social welfare administrations must implement and practice the spirit of the *1974 Children's Act*, which is developmental rather than corrective or punitive. The removal of a child whether that child is an offender, under trial or a victim (as is often the case) should be treated as the last resort.

The juvenile justice system must be more clearly separated from the formal justice system. This system must be designed to always promote the best interests of the children and would be a fully restorative justice system, as is already outlined in the present legislation, Children Act 1974. This legislation needs clarification and implementation. Once clarified, this system would require such aspects as: Alternative Dispute Resolution for children possibly involving the village court and arbitration council at the local level (to be reviewed for suitability), juvenile courts in all districts with provision of services, integration of the juvenile justice system with services provided by Youth, Women and Social Welfare Ministries at the local level (therefore need to be included in column of responsible agencies).

Safe homes must be understood as entirely separate from Kishore Unnayan Kendros. Safe homes should not be a training centre but rather, as the name suggests, a place children can go for short periods to keep them safe. There should be NO training component delivered in the safe home, rather only assessment and referral to appropriate training centres in their community if necessary.

PLEASE NOTE that in the Good Governance Matrix, the correctional centres for children are NOT at Lalmatia or Dhaka and the one at Jessore is a district centre so the Tongi and Konabari centres should be listed as under Gazipur District.

Kishore Unnayan Kendros need to be recognized as industrial/training schools as per the legislation. Their administration should be adjusted accordingly.

2. Ensuring abuse is not perpetrated by its own organisations (eg the juvenile justice system):

We are happy to see that this is somewhat covered in the matrix of the PRSP but needs further details: create and implement policy (with extensive training) within all government run or funded institutions that come into contact with children that strictly forbids, any sort of abusive treatment of children, even in the name of discipline. Children will have recourse for complaint within all institutions. Future priorities can include: regular inspection of all government institutions to ensure child protection; ensure children coming into contact with government institutions the right to contact the Children's Ombudsman/Advocate at any time

OTHER:

- Mandatory evaluation of NGOs work with Hard Core Poor's children. Monitoring of the children's outcomes necessary, not just the income levels. This should be built into all programme planning, and not a separate reporting structure.
- In the children rule, physical punishment should be repealed.
- "Domestic violence" must be clearly defined for proper response
- Adopt the draft Social Policy for Care and Protection of Children
- Review the Children Act 1974 and Rules 1976 [department of Social Services started a process and it needs to be continued]
- It is important to analyse the Criminal Justice System reform activities conducted to date (i.e. those listed in section 5.416) for their actual impact on children.
- Cross jurisdictional issues – children who come into contact with the law in a location that is disputed between two police jurisdictions need to have top priority to have the matter resolved quickly.
- Probation – will only work for children if the community is supportive of the probation system and thus, relationship building between police, probation officers and the community is a must. The community must have confidence in the system for it to work for children.

Working Children

While child labour is rooted in poverty, it is also related with lack of quality relevant education and adult attitudes in which sending children to work is acceptable. Poverty and vulnerability to shocks also causes households to send children to work in order to cope and survive. The priority here must be to protect children from present and future harm as a result of work.

Harmful child work results from:

1. poor quality education
2. poverty
3. unregulated, exploitative employment practices, mostly in the informal sector.

Child labour is a complex issue and the simple removal of children from work can prove harmful to them in the immediate and long term. We would recommend:

PRIORITIES:

1. Education

Re-double efforts to provide quality education to all children (see education section)

2. Poverty alleviation measures

3. Mobilise Adults against Exploitation

Mobilise adults who have the power to reduce child labour at the community level to improve working conditions and ensure exploitation is prevented. These include employers themselves, local officials, police, parents and professional associations. This will include strong principles of Corporate Social Responsibility and

- a. Introduction of minimum wage policy for child labour;
- b. Policy for minimum age for admission in to work, apprenticeship, working hour, leave, time off, overtime, physical condition, health facilities, learning and development (Education and training) etc.;
- c. Amended country's existing labour code's in line with CRC and ILO -182;
- d. Creating access to mainstream education for working children through, for example, introducing a double shift at the primary level education.
- e. Targeted health service package for the working children and available for them (see health section)
- f. Re-examine the apprenticeship program and make them shorter to avoid the current lengthy exploitation of children's free labour. Instead, initiate a short skill course that will increase their employability
- g. The draft Child Labour policy must be fully adopted by 2005

Children's Voice

We welcome the priority given to direct actions to improve children's rights and advancement, in particular the recommendation on building platforms for children's voices to be heard. This will not only ensure that children's issues are brought to the fore in the national debate as they are experienced by children themselves, but has the potential to improve the general governance situation with relation to the participation of ordinary people in decisions that affect them. However, we have not seen any reflection of these measures in the policy matrix.

- Children's special sessions in the National Parliament should be reflected in the matrix and assigned a clear lead ministry.
- In addition, we would recommend that children are given a clear role in the monitoring of the implementation of this PRSP and that structures are provided for this to occur.
- From an adult's perspective, poverty reduction may be about food, shelter, health, clothing, education, etc., but a child also needs to play and other forms of extracurricular development which would turn them into healthy (not only in terms of physique) citizens. This area of the PRSP is rather inadequate.

Girl Child

- Evidence does not support the effectiveness of female secondary school stipend programmes, which are inequitable and do not increase secondary school performance (pages 123 & 125).

- There is already a law in place that was designed to protect children from early marriage. That law should be reviewed and amended for its proper and immediate implementation.

Industry

It is not clear from the document what will be the impact on the phase-out of the current textile quota regime (pages 71 and 75 appear to give slightly contradictory analyses on these points). If there is a serious impact on employment in the ready-made garment sector, this will have a significant impact on children, both directly due to the number of under 18 year olds employed in the sector and indirectly as many of the adult workers are primary care givers. If the impact is significant, then the Displaced Workers Rehabilitation programme, while the measures appear both appropriately targeted and well suited to the economic environment, will not be adequate to offset this impact at the scale described in the text. We can find no reference to this programme in the policy matrix

Given the likely impacts of the phase-out of the MFA, measure promoting export diversification (page 76) should specifically target subsectors which will provide employment opportunities and promote women's involvement in currently male-dominated subsectors. It does not appear to do this currently. Again, we cannot find reference to these measures in the policy matrix.

On pages 88 and 89 the employment opportunities suggested for women appear to be all in highly skilled sub-sectors requiring a reasonable level of education. Opportunities will also need to be sought in low-skilled sectors. A key constraint to women's employment at all skill levels is the availability of appropriate child care. Such a programme, if implemented on a wide scale, could make a huge difference to women's labour force productivity and the welfare of children.

- **The PRSP should encourage and enforce childcare provision by employers in the formal sector (through legislation and tax breaks) and should consider support to NGO/community childcare provision in the informal sector.**

Given the importance of the informal sector in providing livelihoods for the families of poor children, ***the policy of applying VAT to this sector should be reviewed***. Returns here are marginal in the face of competition from cheap imports, and when they are reduced the effects are felt very directly in terms of reduction of employment and more dubious labour practices, particularly the exploitation of child workers.

Ship breaking is the major source of iron in Bangladesh. In addition, the total investment in ship breaking industry is about 8000 crore taka and the earned revenue by the government is about 1100 crore taka per year. In recent days, the numbers of child workers are increasing rapidly in ship breaking industry. According to the advocacy project activities of YPSA, the number of child workers is about 22% of the total workers of ship breaking industries. Due to the Manga, soil erosion, poverty, lack of employment and education, natural disaster and lack of government initiatives forces the child workers to work in this sector. It is well known that the working environment of ship breaking is very unsafe, especially due to the workload and high number of serious accidents. It is an extremely dangerous and unsuitable place for child workers.

- Medium and large scale industries – directly and indirectly rely on child labour
- Gas sector – the impact of repeated accidents in the gas sector on children's lives should be analysed
- Ship breaking - public policy needs to be developed to specifically address the conditions of this overall shipbreaking situation, especially the children workers' condition.

Water

- A moratorium on ground water extraction should be declared until and unless the extraction is authorised by competent authorities.

- Dredging system – look to other countries (North Korea) for low cost possibilities

Agriculture

We would caution that the focus in the agricultural sector on commercial agriculture may be unrealistic in the medium term given existing levels of infrastructure and would act to the detriment of marginal farmers and the landless in the long term. The current trend of increasing landlessness is likely to be exacerbated by unregulated, export oriented production (in a similar manner as has already occurred with the shrimp industry) and to significantly reduce the effectiveness of other poverty reduction measures.

- As poultry farming increases, women and children become more involved in the handling of and exposure to drugs (i.e. hormones) and pesticides. These chemicals have a direct and indirect impact on their health and reproductive systems that must be acknowledged and addressed through awareness raising on safe handling.

Social Safety Nets

Social safety net programmes can have a huge impact on the welfare and prospects of children and their absence or poor implementation ensures the intergenerational transmission of poverty.

It will be necessary to radically review the role of the Ministry of Social Welfare. The majority of its current activities have very small impact, further stigmatise disadvantaged groups, perpetuate a patron role for the state, are highly inequitable, rarely transparent and have no overall strategic impact on poverty. The MSW should be involved in the future implementation of social safety net programmes once its current administrative problems can be solved. With a portfolio of effective, high impact social welfare interventions administered efficiently and transparently, the MSW could have a key role to play in poverty reduction.

- Child welfare indicators such as participation in harmful child work, incidence of child malnutrition and ability to send children to school should be included in criteria for social safety net programmes. Children should be incorporated into the existing social safety net run by the government like the VGD with specific focus on the needs of functional and actual child-headed households.
- The government should investigate the possibility of promoting such social protection measures as social insurance schemes and health 'coupons'.

Governance

We welcome the prominence given to the importance of local governance in the new PRSP. In particular, access to an equitable system of justice and participation in community decision-making are essential to allow poor households to escape the poverty trap and to redress the currently highly inequitable balance of power at the local level.

- Local governance – specific budget and human resources should be allocated at local government institutions level for the implementation and monitoring of the PRSP.
- There needs to be a greater emphasis on structures for participation of poor households and children in union parishad decision-making and school governance and considerable support from central government to the development of a system of community courts which is fair to those without power, particularly women, children and religious and ethnic minorities.
- Improving Implementation Capacity – to improve implementation capacity, sensitisation to children's rights and issues is a must.
- Children must be acknowledged as having a direct role in good governance (5.404 – Table 7). They can determine where they feel comfortable to operate and be included there. Local government is probably the centre of this area as much of the local government jurisdiction has the greatest impact on children's lives. In addition, Local government needs to be extensively involved in monitoring (see monitoring).

- Implementation – still sits largely with the central government even though other actors, including local govt, have a role. This role should be explicitly acknowledged.
- Examples of good governance (5.403) – agencies listed have not been analysed to understand properly why they are good examples and whether these agencies with such difference governance styles are compatible with each other and replicable. If they are considered examples of good governance because of their relative autonomy from central government control, is this sufficient for good governance? What about accountability to the people?
- User fees – must be abolished in order to ensure that the poorest children have access to services.

Monitoring and Evaluation

- Transparency – need to clearly identify how the monitoring is going to be transparent. Media will play a vital role in communicating information both ways – from the people, including children, to the government and vice versa.
- Organizations outside of government need to be fully included in the main monitoring mechanisms. Having an option of hearing from outside organizations is not enough (8.10).
- Whatever monitoring mechanism is decided on, children need to be actively involved at least in the fields that directly affect their lives (education, protection, development, etc.). Children need to be included in consultations by the proposed NFPF (8.12). The Terms of Reference of the NFPF should be drafted in consultation with civil society, including children.
- Local government needs to have a more prominent role in monitoring which, in turn, will also amplify children's voices in the monitoring system.
- We welcome the inclusion of NPA monitoring into the PRSP, however, children need to be explicitly mentioned as being key players in the monitoring process.