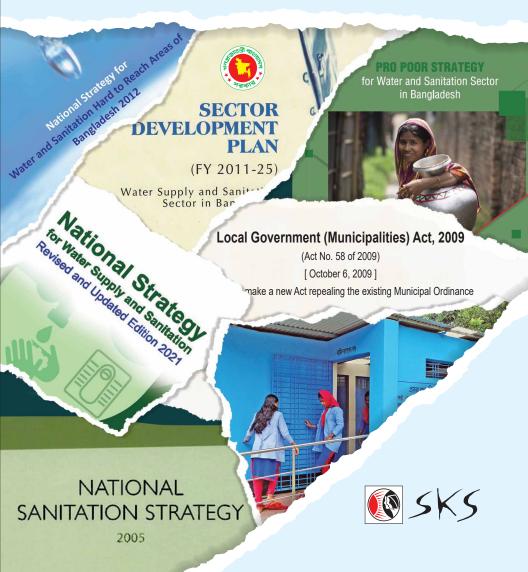




Review of WASH Policies & Programs Concerning Equitable & Inclusive SMSS/CWIS

M. Shafiqul Islam







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Conducted by: M. Shafiqul Islam





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ACRONYMS

ADP	Annual Development Programme
BNBC	Bangladesh National Building Code
BRAC	Bangladesh Rehabilitation Assistance Committee
СВО	Community-Based Organizations
CWIS	City Wide Inclusive Sanitation
DDLG	Deputy Director, Local Government
DPHE	Department of Public Health Engineering
ESDO	Environment and Social Development Organization
FANSA	Freshwater Action Network South Asia
FGD	Focus Group Discussion
FSM	Fecal Sludge Management
GDP	Gross Domestic Product
GO	Government
HLPW	High-Level Panel on Water
IDEAs	Impact on Development, Empowerment and Actions
IRF-FSM	Institutional Regulatory Framework for FSM
IMIS	Integrated Monitoring Information System
IRF	Institutional Regulatory Framework
JMP	Joint Monitoring Programme
LGD	Local Government Division
LGED	Local Government Engineering Department
LGIs	Local Government Institutions
MDG	Millennium Development Goal
MICS	Multi Indicator Cluster Survey
MoLGRD&C	Ministry of Local Government, Rural Development, and Cooperatives
MTBF	Medium-Term Budget Framework
NAP	National Adaptation Plan of Bangladesh (2023-2050)
NFWSS	National Forum for Water Supply and Sanitation
NGO	Non-Government Organization
PPP	Public-Private Partnership
PPRC	Power and Participation Research Center
PRSP	Poverty Reduction Strategy
PSB	Policy Support Branch
SACOSAN	South Asian Conference on Sanitation
SDGs	Sustainable Development Goals
SDP	Sector Development Plan
SKS	Samaj Kallyan Sangstha
SMS	Safely Managed Sanitation
SMSS	Safely Managed Sanitation System
SWAP	Sector-wide approach
TG	Thematic Group
ULGI	Urban Local Government Institution
UNICEF	United International Children's Fund
UP	Union Parishad
WASA	Water Supply and Sewerage Authority
WASH	Water, Sanitation, and Hygiene
WHO	World Health Organization
WSP	Water Safety Plan
WSS	Water Supply and Sanitation

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SKS Foundation is the Secretariat of FANSA-Bangladesh, a network of more than 120 NGOs & CBOs who are implementing programs and running advocacy in the field of WASH. As part of its advocacy network along with other members covering the South-Asian countries, FANSA-Bangladesh is focusing on promoting safely managed sanitation services (SMSS) following the City-wide Inclusive Sanitation (CWIS) approach. The City-wide Inclusive Sanitation (CWIS) approach is demanded to be promoted by the duty bearers of the selected cities/towns under some City Corporations and Municipalities through the implementation of the *'Rising for Rights for Strengthening Civil Society Network in South Asia to Achieve SDG 6'* project, supported by the Bill & Melinda Gates Foundation.

Targeting to run its policy advocacy for the promotion of CWIS, FANSA-Bangladesh felt the need to review the existing policies, guidelines, programs, budget allocation trends in the WASH sector, etc, and find the gaps in policy implementation for safely managed sanitation services following CWIS approach promotion. Concerning this, the Rising for the Rights Project conducted a study to review the relevant national policies & strategies, especially on sanitation promotion, and identify the core elements & gaps in favor of promoting the CWIS/SMSS. The study has chalked out the key gaps in implementing the policies & strategies, guidelines & regulations concerning SMSS promotion, and framed the advocacy agenda to sensitize relevant stakeholders in widening the scope of CWIS promotion in Bangladesh's urban cities/towns.

We gratefully thank Mr. M. Shafiqul Islam, Water, Sanitation and Policy Expert, and former Additional Secretary to the Government of Bangladesh who kindly agreed and took the pains in conducting such a comprehensive review of a series of WASH policies & strategies.

We express our sincere thanks to the concerned government officials, sector professionals, LGI representatives, local allies & community groups, and the FANSA-Bangladesh members across the country who contributed





to the conduction of the study by sharing valuable inputs, opinions & observations concerning the policy & strategy implementation issues in the WASH sector.

Thanks to my colleagues for translating the study findings into this publication. I hope the FANSA-Bangladesh & other like-minded networks, researchers, professionals, potential readers and information seekers will find this publication on WASH policy & strategy review useful for diversified needs & purposes.

Rasel Ahmed Liton

Chief Executive SKS Foundation



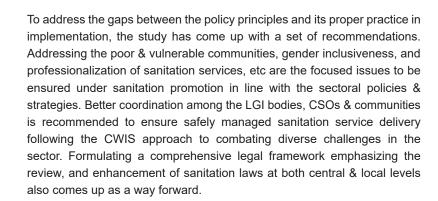
Preface

Bangladesh has made considerable progress in access to improved water supply & sanitation services. The country has also made remarkable progress in reducing the population without access to sanitation facilities. However, despite the elimination of open defecation, improved sanitation including sludge management is yet to be practiced. Alongside, the increasing population in urban areas is overloading the existing sanitation facilities. No adequate sanitation facilities & systems have been developed in the cities & towns centering the escalated population in the urban setting.

The FANSA-Bangladesh-run project "Rising for Rights for Strengthening *Civil Society Networks in South Asia to Achieve SDG 6*" has created a scope for advocacy in the WASH sector for promoting equitable, inclusive sanitation facilities for the people sensitizing the duty bearers of selected cities/municipalities. Concerning this, existing policies & strategies, guidelines, programs, and budget allocations in the WASH sector have been reviewed critically under a special study. The review focuses light on the principles of existing WASH policies & strategies, and pinpoints gaps in practice concerning the promotion of SMSS/CWIS. The review also reveals significant principles & directions in the relevant policies, strategies, acts & regulations in favor of promoting safely managed sanitation services following the CWIS approach.

Alongside gaps in policy implementation, the review also shows the lack of institutional arrangements for safely managed sanitation services (SMSS), and fecal sludge management (FSM) as no dedicated unit or division exists in the City Corporation, Municipality & Union Parishad indicating only an ad-hoc planning & implementation style by the IGIs. The study shows that financing in the promotion of SMSS/CWIS is more ad hoc and lacks a long-term planning approach at the LGI level which impacts the sustainable promotion & practice of safely managed sanitation services. The absence of an effective business model for FSM services also hinders private sector involvement in the sector. Regulations & accountability mechanisms at the local government institutions (LGIs) are underdeveloped, which is causing public sanitation facilities to be deficient, especially for women, girls, and individuals with disabilities, the review reflects.

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Considering the WASH sectoral policy principles and the gaps in implementation, the study upholds an advocacy plan outlining several tasks to enhance the promotion of sanitation practices by the local government institutions with a focus on safely managed sanitation services, fecal sludge management, and city-wide inclusive sanitation. The advocacy plan also emphasizes launching awareness & advocacy campaigns involving civil society and ensuring community engagement through Enter-Educate communication media for SMSS & CWIS promotion countrywide.

The study will certainly guide FANSA-Bangladesh in line with its mission to network & advocate to sensitize relevant decision-makers, duty-bearers & stakeholders for the promotion of SMSS in the cities & towns following the CWIS approach. Alongside, potential development practitioners, researchers, information seekers, and so on will find this review findings useful.

Joseph Halder

Director– Advocacy & Communication SKS Foundation, and Convener, FANSA-Bangladesh

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EXECUTIVE SUMMARY

The study reviewed & identified several policy gaps in Bangladesh's WASH sector with a particular focus on safely managed sanitation. Firstly, there is a lack of comprehensive data on safely managed sanitation systems, particularly in urban areas. Institutional arrangements for fecal sludge management (FSM) are fragmented, with no dedicated unit or division, leading to ad-hoc planning and implementation. Sanitation financing is often ad hoc and lacks a long-term planning approach, impacting the sustainability of services. The absence of an effective business model for FSM services hinders private sector involvement. The study findings emphasize the need for addressing the poor & vulnerable communities, gender inclusiveness, and professionalism of sanitation services, highlighting gaps in policies and their implementation. Local-level regulations & accountability mechanisms are underdeveloped, and public sanitation facilities are deficient, especially for women, girls & individuals with disabilities. Overall, these gaps underscore the need for comprehensive & coordinated policy reforms to ensure effective sanitation service delivery and address the diverse challenges in the sector.

The study proposes a holistic & inclusive framework approach to achieve SDG 6.2, ensuring universal access to adequate sanitation & hygiene while ending open defecation by 2030. The proposed steps include establishing a CWIS Steering Committee comprising diverse stakeholders, conducting a baseline assessment to understand current sanitation conditions, and developing a vision, goals & strategies through participatory efforts. The framework further advocates the creation of a detailed action plan, its phased implementation with monitoring & evaluation, and a long-term sustainability focus. Key considerations involve affordability, equity, climate resilience, technological innovation & community engagement to ensure the effectiveness and viability of the CWIS framework. This comprehensive approach aims to address the specific needs of different community groups, foster innovation & establish sustainable sanitation practices in the Bangladesh context.

The study outcome contains a proposed advocacy plan outlining several tasks to enhance sanitation practices in local government institutions (LGIs) in Bangladesh, with a focus on Safely Managed Sanitation (SMS), Fecal Sludge Management (FSM), and City-Wide Inclusive Sanitation (CWIS).

The plan includes developing communication materials for SMS & CWIS, launching awareness & advocacy campaigns, and involving civil society & desludging operators. It also suggests a comprehensive review of institutional mechanisms, organograms & human resources related to SMS & CWIS by December 2025, with an emphasis on private sector engagement. Additionally, research & development initiatives led by a core team are proposed, targeting December 2025. The plan outlines regulatory measures, including formulating model by-laws by December 2024 and business model guidelines by December 2025. Private sector engagement, FSM expos, hackathons, and the establishment of helplines and service providers' associations are also part of the multifaceted approach to enhance capacities, promote learning, and implement market-based approaches in SMS, FSM & CWIS from now & onwards.

The focus group discussions (FGDs) conducted in different locations revealed varied perspectives & challenges related to sanitation & hygiene in Bangladesh. In Gaibandha district covering Gaibandha Pourashava & Saghata upazila, the FGDs with local communities emphasized diverse definitions of sanitation & hygienic latrines, with participants recognizing the importance of safely managed sanitation. The findings highlighted gaps in awareness of sanitation-related laws, SDGs, and the need for inclusive practices. Recommendations included sanitation awareness campaigns, prioritizing household sanitary latrines, exploring fecal waste management, and collaboration with stakeholders.

In Barisal City Corporation, the FGD, with community representatives, students, and local authorities, showcased a complex sanitation landscape. Participants provided diverse definitions of sanitation & hygienic latrines, with varying perceptions of the sanitation rate. Challenges included inadequate enforcement of sanitation laws, issues with public toilets, and barriers to implementing safely managed and inclusive sanitation. Recommendations covered awareness campaigns, school sanitation education, strengthened sanitation laws, stakeholder engagement, and climate resilience initiatives. The FGD with civil society representatives in Barisal City Corporation addressed the perspectives of sanitary masons, equipment businessmen, students, and community organizers. Participants described sanitation as cleanliness, emphasizing the importance of safely managed and inclusive sanitation. Challenges included shared latrines, inadequate waste management, and climate change impacts. Recommendations focused on

preventing project duplication, enforcing sanitation laws, establishing a sanitation committee, coordinating awareness campaigns, city planning, and improving waste disposal.

In Sreemangal Pourashava, the FGD with civil society representatives identified low sanitation rates, insufficient waste disposal mechanisms, and limited awareness of SDGs and sanitation laws. Recommendations emphasized the immediate establishment of dumping stations, the allocation of dedicated budgets, enhanced public toilets, inclusive sanitation facilities, and extensive awareness campaigns. The FGD with local community representatives in Sreemangal Pourashava involved sweepers, sanitation workers, toilet leaseholders, and NGO workers. Participants defined sanitation as clean and safe latrines, highlighting challenges with unhygienic latrines and a lack of awareness regarding inclusive sanitation and the SDGs. Recommendations included increasing water sources & latrines, repairing houses, creating alternative job opportunities, and launching public awareness campaigns on sanitation & climate change impacts. Overall, the recommendations across FGDs underscore the importance of awareness campaigns, stakeholder engagement, strengthened enforcement of sanitation laws, and inclusive approaches to address the diverse challenges in sanitation & hygiene across different locations in Bangladesh.

The key informant interviews with Pourashava authorities & stakeholders have yielded comprehensive recommendations for improving sanitation activities in various areas, including Barisal City Corporations, Gaibandha Pourashava, Sreemangal Pourashava, and Bangladesh as a whole. In Barisal City Corporations, recommendations encompass the implementation of city-wide inclusive sanitation programs, enhancing the legal framework, providing training & essential equipment, clarifying roles, promoting collaboration, sharing information on sewage management, understanding Pourashava legislation, improving law implementation, adopting inclusive solid waste management, digitizing the Pourashava budget, and continuing Sustainable Development Goals (SDG)-aligned initiatives. Similarly, Gaibandha Pourashava is advised to conduct a manpower assessment, integrate WASH & cleanliness branches, invest in solid waste management infrastructure, reevaluate budget allocations, prioritize sanitation awareness programs, implement menstrual management programs, enhance legislation and enforcement, engage in long-term planning, collaborate & share information, and invest in fecal sludge management infrastructure.

Sreemangal Pourashava is recommended to address manpower shortages, integrate WASH & cleanliness branches, enhance solid waste management, improve legislation & enforcement, expand menstrual management programs, review & increase budget allocations, coordinate with external initiatives, implement inclusive practices, explore sustainable funding strategies, and promote NGO support for awareness programs. Recommendations from ITN BUET involve awareness enhancement for new officials, improved enforcement of existing laws, clarifying stakeholder engagement & responsibilities, financial planning & allocation, community involvement & public awareness, training & manpower development, private sector engagement in research, improvements in solid waste management, expansion of sewage management initiatives, and adaptation of Pourashava budget management. Additionally, the recommendations drawn from the Additional Chief Engineer at DPHE emphasize the need for enhanced awareness, legal framework review, technical capacity strengthening, stakeholder engagement, rural extension of CWIS programs, organizational manpower enhancement, and skilled manpower development within the DPHE to effectively implement sanitation initiatives. These recommendations collectively contribute to a holistic approach to addressing sanitation challenges in Bangladesh. Finally, recommendations from the CEO of the CWIS-FSM Support Cell suggest enhanced awareness and training, decentralized implementation, stakeholder engagement, resource mobilization, and innovation, gender-responsive & inclusive planning, long-term planning & leadership, acceleration of SDG implementation, continuous skill development, integrated waste management & 3R principles, and flexible Pourashava organograms & budget allocation. These collective recommendations aim to fortify sanitation activities, improve regulatory frameworks, enhance waste management practices, and ensure sustainable & inclusive WASH programs.

Based on the field assessments and expert discussions, the advocacy agenda for citywide inclusive sanitation focuses on a few key points to drive positive change. It begins with the urgent need for a comprehensive legal framework, emphasizing the review and enhancement of sanitation laws at both Pourashava and national levels. The agenda stresses the implementation of inclusive sanitation programs, calling for collaboration with stakeholders and active community engagement. To address challenges in waste management, it advocates for capacity building & training, emphasizing the importance of well-equipped personnel. Additionally, the agenda underscores

the significance of coordination and collaboration between *Pourashava* bodies, sweepers, NGOs & other stakeholders for an efficient approach. Transparency is promoted through information-sharing initiatives, including the digitization of Pourashava budgets. Understanding Pourashava legislation, improving the implementation of laws, and adopting inclusive solid waste management practices are integral components of advocacy. Aligning initiatives with Sustainable Development Goals (SDGs) and ensuring they contribute to broader development objectives are also highlighted. The suggested recommendations involve multi-stakeholder collaboration, advocacy & awareness campaigns, policy advocacy, capacity building, resource mobilization, monitoring & evaluation, community engagement, public-private partnerships, technology integration, and comprehensive long-term planning to ensure sustainability and resilience in sanitation initiatives.





1. Background of the Study

The urban landscape of South Asia is undergoing a significant transformation, driven by the relentless growth of its population. By the year 2030, it's estimated that more than 55% of the population in the region will be residing in urban areas with a particular focus on the burgeoning cities of South Asia. This demographic shift is especially pronounced in Bangladesh, a country already characterized by its high population density, with a staggering 1286 individuals inhabiting every square kilometer as of the year 2020. Notably, this population density is even higher in urban centers compared to rural areas.

Several key factors contribute to this urbanization trend in Bangladesh. The relatively vulnerable economic conditions prevailing in rural areas, coupled with limited employment opportunities and inadequate access to healthcare & education, are compelling individuals to migrate from rural to urban regions. Additionally, the allure of industrialization, the centralization of services and facilities, and improved transportation networks are further fueling the rapid urbanization of Bangladesh. However, despite these significant demographic changes, the lack of effective urban planning by government authorities and insufficient regulation of private developers are hampering the development of well-structured & organized cities in the country.

As the urban population continues to swell, essential services such as water supply & sanitation systems are becoming increasingly strained & overburdened. The urban centers are grappling with inadequate sanitation facilities that have not kept pace with the rising population. This deficiency can be attributed to the absence of appropriate policies, guidelines & regulations, and the inadequate allocation of budgetary resources. The ramifications of this deficiency extend beyond inadequate sanitation, as it directly impacts public health, productivity, competitiveness, and overall quality of life, thereby exerting significant pressure on the national economy.

To address these pressing challenges, the government and development partners have recognized the importance of implementing a Safely Managed Sanitation System (SMSS) to meet the growing needs of urban populations. As part of the advocacy network covering South Asian countries, FANSA-Bangladesh has also directed its attention toward SMSS within urban areas, with a particular focus on promoting City-wide Inclusive Sanitation (CWIS). This initiative is being undertaken through the "*Rising* for Rights for Strengthening Civil Society Networks in South Asia to Achieve SDG 6 project" (hereinafter referred to as the "Rising for the Rights Project").

To effectively advocate for CWIS & SMSS promotion, it's imperative to conduct a comprehensive review of existing policies, guidelines, programs & budget allocation trends related to water, sanitation & hygiene (WASH) in urban areas. Identifying gaps in policy implementation & action is crucial to formulating an effective advocacy strategy. Consequently, there is a pressing need to evaluate the strengths & weaknesses of existing WASH and sanitation policies, assess gaps in their implementation, and provide insights to facilitate the effective promotion of CWIS as an approach to achieving Sustainable Development Goal 6 (SDG-6).

SKS Foundation, as the secretariat of FANSA-Bangladesh and the host organization for implementing the Rising for the Rights Project, hired an individual consultant capable of providing the assignments. This effort marks a critical step toward addressing the sanitation challenges brought about by rapid urbanization in Bangladesh and aligning with international goals for sustainable development.

2. Objectives

The assignment is aimed at achieving the following objectives:

- a) Review of WASH Policies and Programs
- b) Identifying Key Gaps in Policy Implementation
- c) Formulating an Advocacy Agenda

3. Scope of work

The matrix on assignment objectives, vis-à-vis, scope of work, vis-à-vis, activities is as below:

SI. No.	Objectives	Scope of work	Activities
1.	Review of WASH Policies and	A comprehensive review of policies & strategies on WASH, with special	Collect & review national WASH policies, strategies, programs & budget documents.
	Programs	emphasis on Citywide Inclusive Sanitation (CWIS) and Safely	Extract features related to CWIS & SMSS.
		Managed Sanitation System (SMSS).	 Analyze, internalize & suggest directions for promoting equitable & inclusive CWIS & SMSS.

SI. No.	Objectives	Scope of work	Activities
2.	Identifying Key Gaps in Policy Implemen- tation	Identifying gaps & issues related to policies, strategies, planning, implementation & monitoring of CWIS & SMSS.	 Identify gaps & issues in existing documents. Analyze these gaps & issues, and if necessary, discuss & validate this information. Come up with potential solutions to these gaps & issues.
3.	Formulating an Advocacy Agenda	Formulate advocacy agenda to mitigate gaps/issues and plan & implement CWIS & SMSS.	 Stakeholder mapping & analysis Develop Advocacy Framework Develop a communication strategy to sensitize stakeholders for CWIS & SMSS.

4. Methodology

The framework for carrying out the assignment is shown below:

- a) Phase-1
 - Desk Research: Collect relevant WASH Policies, Strategies, Circulars, Program & Project documents related to WASH in Bangladesh from secondary sources either through Google search and/or by contacting specific relevant ministries, departments & agencies.
 - Internalization: Upon reading & taking notes of relevant information, the consultant tried to internalize the entire enabling factors, issues, gaps & potential recommendations after discussion & brainstorming with concerned partners along with SKS colleagues.
 - Inception Report: Based on desk research & internalization, an Inception Report was submitted to SKS Foundation, and based on agreed upon methodology the detailed assignment activities were initiated.



b) Phase-2

- Field Mission Preparation: The consultant prepared templates & questionnaires for interviewing field missions to capture the understanding & perception on WASH, especially on CWIS & SMSS among local stakeholders.
- Field Mission: The field mission conducted in Gaibandha Pourashava, Saghata Upazila of Gaibandha district, Barisal City Corporation of Barisal district, and Sreemangal Pourashava of Moulvibazar district, brings a localized perspective to the study. Carried out transit walks, focus group discussions (FGD), key informant interviews (KII), and citizen dialogue to gather firsthand information about the challenges, successes & implementation status of the policies at the grassroots level.
- Online Key Informant Interview (KII): Online KII was carried out among selected stakeholders to capture the perception & understanding of the policy, strategy, and implementation process of WASH, especially concerning CWIS & SMSS.

 Data Analysis & Gap Findings: Upon collecting all information, the data was analyzed and gaps vis-à-vis solutions were identified.

c) Phase-3

- **Prepare Matrix on Gaps vis-a-vis Solutions:** Based on available data & information, a review of WASH sector regulatory and legal frameworks, as well as financial provisions, to support the implementation of policies and strategies at the local government level was conducted, which reflected in form of a matrix with potential solutions.
- Develop CWIS/SMSS Advocacy Framework & Communication Strategy: Gaps/issues and solutions lead towards developing a framework for CWIS/SMSS Advocacy framework including communication.

d) Phase-4

<u>Consolidate Findings & Prepare Draft Report</u>: The entire backend activities & findings were consolidated in a draft report and submitted for review.

Discussion on the Draft Report with Stakeholders, and Final Report: Stakeholder consultation and discussion to be held to review the draft and upon feedback the draft report will be finalized.



ANALYSIS OF POLICIES & REGULATIONS



Policy Directions & Gaps in Implementation of CWIS & SMSS in Bangladesh

The Citywide Inclusive Sanitation (CWIS) approach addresses the pressing need for sustainable and equitable sanitation services in urban areas, to ensure that all residents have access to fair and durable sanitation facilities. CWIS is essential for meeting the targets outlined in the Sustainable Development Goals (SDGs) by fostering safe and healthy urban environments. To accomplish this, it is necessary to reorganize sanitation services into public service systems. CWIS systems strive to provide secure, equitable, and sustainable sanitation services to every person in a city, including those from marginalized and vulnerable communities. To achieve these objectives on a large scale, it is vital to rectify the deficiencies of current sanitation markets by establishing publicly managed sanitation service systems that incorporate both sewered and non-sewered approaches. The following discussions indicate the gaps & issues identified on the way to finding the implementation of CWIS (Citywide Inclusive Sanitation) and SMSS (Safely Managed Sanitation Services) in Bangladesh:

1. Government Commitment & Regulations: The government of Bangladesh has shown a strong commitment to improving sanitation services, as reflected in its *National Strategy for Water Supply and Sanitation 2021*. The strategy emphasizes the importance of inclusive sanitation, community participation, and the integration of water, sanitation & hygiene (WASH) services. But in many cases, they are not fully active. There is a need for stronger regulatory frameworks governing safely managed sanitation services regarding treatment standards for wastewater management systems' safe disposal practices that promote sustainable operations across urban areas effectively. However, based on the review of the legislation and relevant policies & strategies, and the outcome of the FGDs & KIIs, the following are some key instances that show the gaps in the regulation as well as implementation:

a) The Local Government (City Corporation) Act, 2009 (section 50), city corporations can constitute 15 standing committees, if needed, they can constitute more. There are two WASH-related standing committees on waste management, water & electricity. But sanitation & hygiene are not mentioned here. Moreover, in section 41, city corporations must maintain waste management, including the cleanliness of toilets, etc. Even the city corporation can impose penalties,



especially for those who connect their sewer line with the drain. But The city corporations, including pourashava, are reluctant to impose penalties for such kinds of offenses. The government formulated many regulations related to public health. In some cases, the LGIs need to prepare by-laws to implement the regulations. But it's rare in practice.

- b) LGD issued a circular for the "Pourashava Water Supply and Fecal Sludge & Sanitation Management Guidelines, 2023" on 14 March 2023. There is an instruction in the circular that each pourashava will practice this for six months and then they will prepare the by-laws on it. But no pourashava has done this so far. In 2017 the LGD prepared the "Institutional and Regulatory Framework for Faecal Sludge Management (IRF-FSM) and "National Action Plan for the Implementation of Institutional and Regulatory Framework for Fecal Sludge Management (2021-2030)". This implementation plan was formulated into the framework after four years.
- c) As per the provisions of the Local Government (Pourashava) Act, 2009, Section 55 of the Act), there is no committee on WASH, but it's mentioned that if needed, they can constitute another committee like water & sanitation, waste disposal, etc. Though, water & sewerage and waste management are the main responsibilities of the pourashava. Pourashava Model Tax Schedule, 2014: The inclusion of this tax schedule document is relevant as it outlines the taxation system employed by the Pourashavas. Understanding the tax structure is essential to assessing the financial capacity & sustainability of the Pourashavas in delivering water supply & sanitation services.
- d) As per Section 45(1) (Jha) of the Local Government (Union Parishad) Act, 2009, each Union Parishad will constitute a standing committee on sanitation, water supply & sewage. 13 standing committees need to be constituted by the UP. Practically, it's very difficult for UP to make all these committees functional because they have limited manpower & budget. Section 47 of the Act instructs to perform 39 types of functions, including water supply, but sanitation & hygiene are not mentioned. On the other hand, UP can impose penalties for polluting the water & environment, etc., and unhygienic toilets, urinals, etc. But in practice, it's not to apply; even the UP officials are

not fully aware of these provisions (section 89 and the 5th schedule of the Act).

- e) Most important is that the citizens are also unaware of the provisions of the Act to protect their rights. On the other hand, Section 63 of the Act describes that there are 9 departments of 7 ministries whose relevant officials are transferred to the UP to provide service at the doorsteps of the citizens. These practices are very limited in case of implementation.
- f) The Pro-Poor Strategy for the Water and Sanitation for Water Supply Sector in Bangladesh, 2020, is a good inclusive document to protect the rights of marginalized people. This document is also not well circulated and is limited in practice.
- g) The Bangladesh National Building Code, 2020, is a set of relevant guidelines for constructing & maintaining buildings, including provisions for safe water supply & sanitation facilities. Its inclusion is important to assess compliance with building standards in the sanitation sector. But this is not used in many cases.

a) The National Adaptation Plan (NAP) of Bangladesh (2023–2050) highlights the importance of climate change adaptation in the water supply & sanitation sector. It emphasizes addressing climate risks and building resilience in infrastructure planning & development. But the people are not aware of this valuable document.

b) Strategies & Technical Guidelines for Climate-Resilient Water Supply and Sanitation Services for Pourashavas in Bangladesh published by DPHE in December 2020. This document provides strategies & technical guidelines for improving water supply & sanitation services in Pourashavas. It doesn't create huge awareness for the Pourashava officials and the citizens. [Details of the analysis of the relevant policy documents are given in Annex I.]

Gaps & Issues Identified from FGDs

With the participation of the Mayor, Councilor, Standing Committee Members, Technical officers, Slum Officer, Social Development Officer, Sweeper, Mason, Local entrepreneur, Vacue Tag operator under the City Corporation and Municipalities, and representatives of the CSOs, Citizens groups & allies & Local NGOs, the FGDs focused on and determined the difference between the concept & reality of safely managed sanitation and city-wide inclusive sanitation at the individual, community & local government levels. The participants verbally shared the anticipative WASH scenarios and upheld the current perception of the people about WASH in the locality.

The following gaps & issues were identified in the FGDs:

- a) Most people are not aware of sanitary latrines, including city-wide inclusive sanitation.
- b) On average, 80% of the toilets in the Pourashava area of Gaibandha district are not hygienic.
- c) There is no sanitary pad disposal management system in the locality.
- d) Only 8–9% of latrines have piped water connections.
- e) About 10% of people practice open defecation.
- f) Approximately 30–40% of latrines have the disposal issue of fecal sludge. Normally, the sweepers collect the sludge from the latrines during the night and dispose of it there as they think fit. There are no instructions from the Pourashava on how to dispose of the fecal sludge in the said area. There is no FSM treatment system in Pourashava.
- g) No WASH awareness campaigns or training were held for the citizens.
- h) The meetings of the standing committee are not held regularly, and there is no standing committee yet to be formed.
- Most of the LGIs are suffering from a lack of budget to conduct awareness campaigns, skill development for the Pourashava staff for FSM, and plant installation.



- j) Almost in every Pourashava, there is no clinical waste management system. It's creating a huge problem for the local people.
- k) Still, almost 50% of the households are using single-pit latrines.
- I) Approximately 15% of the households are sharing their latrines.
- m) Almost all the toilets are not inclusive.
- n) There is no proper survey of the WASH scenarios in the local area.
- o) The local people are experiencing the symptoms of climate change, like frequent floods, droughts, etc. So, they need some protective measures to combat climate change.
- p) The overall WASH scenario for sweepers is the worst. Their living conditions are bad in comparison with those of the mainstream. Whereas they are working for the cleanliness of the city. [Details of the analysis of the FGDs are given in Annex II.]

Gaps & Issues Identified from KIIs

The following gaps & issues were identified by the relevant officials covered under KIIs:

- a) Almost all the officials agreed to the change or formulation of the regulations regarding WASH, especially FSM.
- b) They are also convinced that training and awareness-building programs need to be taken immediately.
- c) Collaboration and cooperation between GO-NGO are essential.
- d) Digitalization is very important to ensure transparency, accountability, and timely delivery of services to citizens.
- e) SDG-aligned programs need to be taken by the LGIs.
- f) Long-term programs are very important for the city authority to make them successful & sustainable.



- g) Some sort of reorganization of the existing manpower and the need to engage more efficient staff with current knowledge & technology in the organization.
- h) It's needed to increase the budget for WASH and mobilize local resources to run the organization smoothly.
- i) Legislation and enforcement enactment are not properly happening in the area.
- j) Almost 100% of households have given their sewerage connection to a Pourashava drain.
- k) Involvement of the private sector is not sufficient and, in some cases, is zero.
- I) Gender-responsive, inclusive planning for WASH is absent. [Details of the analysis of the KIIs are given in Annex III.]

2. Inclusive Approach: CWIS aims to provide sanitation services to all residents regardless of their income level or location. It focuses on improving access to basic facilities such as toilets, waste management systems, and sewerage networks. This approach aligns with the Sustainable Development Goals (SDGs), specifically SDG 6 on clean water and sanitation.

3. Public-Private Partnerships: The government has encouraged public-private partnerships for the implementation of CWIS projects. This approach involves collaboration between government agencies, private sector entities, NGOs, and communities to ensure effective service delivery.

4. Limited Awareness: Despite policy commitments from the government, there is still limited awareness among communities about the benefits of improved sanitation practices. Many residents continue to use open defecation or inadequate latrines due to a lack of knowledge or cultural barriers. For instance, it may be mentioned that the *Bangladesh Water Act, 2013, and Bangladesh Water Rules, 2018* are very good regulatory tools to establish water governance in the country, but people are not aware of those.

5. Financial Constraints: Implementation at scale requires substantial financial resources that may not be readily available for local governments or communities. Insufficient funding can hinder infrastructure development for CWIS projects.

6. Maintenance Challenges: While efforts have been made to improve access to sanitary facilities through construction initiatives, ensuring long-term functionality remains a challenge due to inadequate maintenance mechanisms within communities or institutions responsible for operation & maintenance.

7. Equity Issues: Although CWIS aims for inclusivity in service provision across income levels & locations within cities, there are still disparities in access among different social groups such as slum dwellers or marginalized populations residing in remote areas.

Addressing these gaps requires multi-stakeholder collaboration involving policy-makers at national/regional/local levels alongside community engagement programs aimed at raising awareness about improved hygiene practices while providing technical support where needed.



A FRAMEWORK FOR SAFE & INCLUSIVE SANITATION PROMOTION



By adopting a holistic & inclusive approach, Pourashava authorities in Bangladesh can develop & implement sustainable CWIS frameworks that achieve SDG 6.2 of ensuring access to adequate and equitable sanitation and hygiene for all and ending open defecation by 2030. The development of a sustainable city-wide inclusive sanitation (CWIS) framework for Pourashava in Bangladesh is currently in progress. It's a comprehensive approach that integrates waste management, water supply, sanitation & hygiene practices within a city or Pourashava and focuses on improving access to clean water, proper sanitation facilities, and promoting hygienic behaviors while managing solid waste efficiently & sustainably.

WASH Framework for SMSS/CWIS

Governance & Integrated Urban Planning	Fiscal Sustainability
Key Focus Areas:	Key Focus Areas:
1. Vision & long-term strategic	1. Accountability and transparency
planning	2. Revenue and financial autonomy
2. Stakeholder participation	3. Expenditure management
3. Data management	4. Management of debt and other
4. Trend analysis	obligations
5. Land use & zoning	
6. Urban growth pattern	
7. Informal settlements	
8. Transport & mobility integrated	
with land use	
9. Cultural heritage	
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Enabling Environment

WASH Services			
Service Delivery	Climate Resilience	Environment & Resources	Economics
Key Focus Areas:	Key Focus Areas:	Key Focus Areas:	Key Focus Areas:
1. Improved services	1. Clean energy	1. Clean environment	1. Economic performance
2. Reliability	2. Energy efficiency	2. Clean public health	2. Business climate innovation & entrepreneurship

WASH Services				
Service Delivery	Climate Resilience		Environment & Resources	Economics
Key Focus Areas:	Key Focus Areas:		Key Focus Areas:	Key Focus Areas:
3. Quality of services	3. Greenhouse gas reduction		3. Production & reuse pattern	3. Livelihood opportunities
4. Timely operation & maintenance	4. Climate Change Adaptation		4. Recycling pattern	4. Shared prosperity
5. Monitoring & evaluation	5. Disaster Risk Reduction			5. National & Global appeal
6. Users' satisfaction				
7. Learning & sharing				

There is a need for a framework to deliver effective, efficient, and quality WASH services. This requires an enabling environment governed by 'Governance Integrated Planning' and 'Fiscal Sustainability'. Therefore, it's important to investigate both the framework for enabling the environment as well as the framework for WASH services, which comprises service delivery, climate resilience, environment & resources, and economics as shared in the above matrix.

For rolling out the framework, the following steps are required:

Step 1: Establish a CWIS Steering Committee

The CWIS Steering Committee should be composed of representatives from all concerned. The CWIS Steering Committee should be composed of representatives from all relevant stakeholders, including the Pourashava or Pourashava, other local government agencies, NGOs, donors, and community members. The committee will be responsible for overseeing the development and implementation of the CWIS framework.

Step 2: Conduct a Baseline Assessment

The Baseline Assessment will help identify the current state of sanitation in the Pourashava or Pourashava. This will include assessing the existing

sanitation infrastructure & services as well as the needs of different groups within the community, such as women, children, people with disabilities, and marginalized communities.

Step 3: Develop a CWIS Vision, Goals & Strategies

The CWIS Vision, Goals & Strategies should be developed in a participatory manner, with input from all stakeholders. The vision should articulate the desired future state of sanitation in the Pourashava or Pourashava. The goals should be specific, measurable, achievable, relevant & time-bound. The strategies should outline the key actions that will be taken to achieve the goals.

Step 4: Develop a CWIS Action Plan

The CWIS Action Plan should prioritize and sequence the key actions that need to be taken to implement the CWIS framework. The plan should also identify the resources required as well as the roles & responsibilities of different stakeholders.

Step 5: Implement the CWIS Action Plan

The CWIS Action Plan should be implemented in a phased manner, with regular monitoring & evaluation to ensure that it's on track and meeting its objectives.

Step 6: Sustain the CWIS Framework

The CWIS Framework should be designed to be sustainable in the long term. This will require the commitment of all stakeholders as well as the allocation of adequate resources. Here are some specific considerations for developing a sustainable CWIS Framework in Bangladesh:

a) Affordability: The CWIS Framework should be affordable for the Pourashava, or Pourashava and its residents. This may involve exploring innovative financing mechanisms, such as public-private partnerships.

b) Equity: The CWIS Framework should ensure that all residents, including the poor & marginalized, have access to safe & affordable sanitation services.

This may involve targeted interventions, such as subsidies for sanitation facilities & services for low-income households.

c) Climate Resilience: The CWIS Framework should consider the impacts of climate change and design infrastructure & services that are resilient to extreme weather events. This may involve investing in green infrastructure, such as Rainwater Harvesting Systems and constructed wetlands.

d) Technological Innovation: The CWIS Framework should embrace technological innovation to improve sanitation services and reduce costs. This may involve exploring new technologies for fecal sludge management and waste recycling.

e) Community Engagement: The CWIS Framework should ensure the active participation of the community in all stages of planning & implementation. This will help to build ownership & support for the CWIS program.



ADVOCACY AGENDA FOR SMSS & CWIS PROMOTION



As part of the advocacy agenda, it would be beneficial to sensitize stakeholders, such as policy-makers, relevant government officials, and civil society organizations about the overlapping mandates and the need for clear coordination mechanisms. This will allow for a better understanding of the institutional arrangements and facilitate necessary revisions, if required, to ensure the smooth implementation of sanitation promotion initiatives. The following agenda could be taken for running advocacy centering the SMSS, FSM & CWIS issues:

1. Dialogue with the Government on Identified Policy Gaps

The analysis of existing policies, as initiated at the beginning of this report, sets the stage for a proactive engagement with various stakeholders, operating at different levels, to ensure comprehensive & effective policy frameworks.

At the local government levels (LGIs), it's imperative to initiate dialogues that not only highlight the existing policy landscape but also identify the gaps that may hinder the successful implementation of SMSS, FSM, and CWIS initiatives. Local authorities play a pivotal role in tailoring policies to the unique needs of their communities. Engaging with school administrators, teachers, parents, and local community leaders will provide insights into the specific challenges faced at the grassroots level. This collaborative approach will aid in crafting policies that are not only contextually relevant but also responsive to the evolving nature of digital communication.

Simultaneously, dialogue at the national government level is equally critical. By engaging with policy-makers and relevant government agencies, it can build on existing frameworks and advocate for comprehensive revisions that address emerging challenges in the digital space. Drawing parallels with successful models in other sectors, such as the WASH (Water, Sanitation, & Hygiene) initiatives, provides a precedent for NGOs to collaborate with governments in formulating and revising policies. This collaborative effort ensures that policies are not only comprehensive but also benefit from a diversity of perspectives.

Furthermore, the dialogue should extend beyond policy formulation to encompass implementation strategies and enforcement mechanisms. It's essential to bridge the gap between policy creation and effective execution by fostering partnerships between government bodies, NGOs, educational institutions, and technology stakeholders. This collaborative ecosystem will catalyze the successful implementation of SMSS, FSM, and CWIS policies.

In conclusion, the identification of policy gaps in the realm of SMSS, FSM, and CWIS is the first step toward creating a robust and adaptive framework. By initiating dialogues at both local government & national levels, they lay the foundation for policies that are not only comprehensive but also cognizant of the unique challenges faced by diverse communities. Building on successful models from other sectors, it can leverage the collective expertise of stakeholders to formulate the digital age.

2. Behavioral Change Communication & Advocacy

A comprehensive approach to communication and advocacy for promoting SMSS, FSM, and CWIS involves:

- a) There is a need to develop a short SMSS & CWIS Promotion Strategy or Guidelines through a participatory process with civil society members, concerned stakeholders, and relevant committee members.
- b) Behavioral Change Communication (BCC) materials should be culturally appropriate, relevant, accessible, clear, participatory, and interactive to address the specific needs or challenges of the target groups.
- c) Emphasis should be given to private sector engagement for service delivery and sustainability through investment in infrastructure & services.
- d) Providing training & support to desludging operators on health & safety measures, proper handling of sludge, and environmental protection measures.
- e) It's necessary to fix the specific timeline for training & support activities to ensure a time-bound approach for promoting positive behavioral change or achieving the development agenda.

3. Awareness & Education of the Population

Raise awareness about the importance of sanitation & hygiene and promote safe sanitation practices among all segments of the population. This can be done through public awareness campaigns, school education programs, and community engagement initiatives. But this awareness should be started by the existing and newly recruited officials of the respective organizations. They should get proper training on SMSS, FSM, and CWIS regularly.

Recognition of the importance of public awareness & education in promoting SMSS, FSM, and CWIS initiatives is essential. For example, campaigns, school programs, and community engagement cover a broad spectrum of target groups. Some of the specific plans for public awareness could be identified, and steps could be taken for implementation. For example, a campaign could focus on promoting the SMSS or FSM of CWIS. The posters, radio programs, and community meetings could be included in the campaign. Even the components of social media must be used in the current context. It's also helpful to include motivational materials based on local culture & heritage. For example, Gambhira is very popular in the Rajshahi region. It's also very important to find out the potential challenges that may arise during public awareness & education activities, such as language barriers, cultural sensitivities, and limited resources. So, these challenges or barriers should be mitigated by applying appropriate measures.

4. Stakeholder Engagement

In the context of promoting SMSS, FSM, and CWIS, the agenda emphasizes the importance of collaboration among various stakeholders, including the government, NGOs, donors, and the private sector, in promoting inclusive development. This approach aligns with the principle of inclusive development, which emphasizes the active participation of all stakeholders in decision-making processes. The agenda identifies a common goal for inclusive & safely managed sanitation, which provides a clear direction for stakeholders and ensures that all efforts are focused on achieving a common objective. To ensure sustained engagement, the agenda should specify mechanisms for ongoing collaboration & coordination among stakeholders, such as concerned meetings, collaborative planning sessions, and mutually shared resources. The agenda could also benefit from including examples of successful stakeholder collaborations in similar contexts to provide inspiration & guidance for future collaborations and demonstrate the potential benefits of working together.

5. Advocacy with the Political Parties

Political parties are the driving force behind running the country. They are the actors to play a significant role in shaping policies and decision-making processes in any country. As leaders of their supporters, they have a considerable influence over the political landscape. Their supporters, who are also stakeholders in many development initiatives, have an impact on political leaders. Engaging political supporters at the grassroots level can make advocacy efforts more manageable. These supporters not only participate in political movements but also take part in development-related issues. Collaborating with them on such issues can be advantageous if aligned with the targeted agenda.

The concept of Thinking and Working Politically (TWP) has gained prominence in various countries, and it's essential to address some challenges and limitations while working with political parties. In Bangladesh, several NGOs have been successful in including their demands on WASH in the manifestos of political parties during election preparations. This approach has shown positive results in promoting development initiatives.

To ensure effective advocacy with political parties, it's crucial to identify common goals & objectives that align with the party's manifesto. Collaborating with political supporters at the grassroots level can help to build trust and support for development initiatives. Regular meetings and joint planning sessions can facilitate ongoing collaboration & coordination among stakeholders. Sharing resources & expertise can also enhance the effectiveness of advocacy efforts.

So, engaging political parties and their supporters in development initiatives can lead to positive outcomes. However, it's essential to address challenges & limitations while working with political parties and ensure that advocacy efforts align with the party's manifesto. Regular meetings, joint planning sessions, and shared resources can facilitate ongoing collaboration & coordination among stakeholders.



RECOMMENDATIONS & CONCLUSION



Recommendations

In Bangladesh, there have been notable advancements in enhancing access to sanitation facilities in recent years. However, substantial obstacles persist that must be addressed to attain universally safe & managed sanitation for everyone. To accomplish this objective, a comprehensive strategy is required that encompasses all facets of the sanitation chain, including infrastructure development, public awareness, and capacity building. Some of the critical priorities are:

1. Development of LGIs' Vision & Mission

For sustainable development, to ensure the well-being of the residents, and to create a harmonious & progressive community, it needs to develop the vision & mission of a Pourashava. It's possibly creating an enabling green, clean, and safe environment to achieve quality life for the citizens by ensuring access to quality essential services. During the development of the vision & mission, it's essential to ensure the active & meaningful participation of the people. So, they can express their feelings, aspirations & opportunities. People can take part in the development process through their participation. It's experienced that the community does not always like the infrastructure, like a jungle of concrete. They like an environment where they and the next generation can live without any environmental hazards. They want good education and health care services for themselves, with equal opportunities for anybody with tolerance among residents of different ethnicities, religions & backgrounds. By exercising this vision and the stated mission, a Pourashava can create a positive, accountable, transparent & vibrant community that meets the needs & aspirations of its citizens. This vision & mission will be very helpful in achieving the targets of SMSS, FSM, and CWIS.

2. Institutional Arrangements

According to the identified gaps, the following steps are recommended to be taken at different levels:

a) City Corporation Level

 Due to a lack of clear institutional arrangements for FSM at the local government level, fragmented responsibilities and inadequate coordination, limited capacity and resources, and the absence of a dedicated regulatory framework for FSM, the sector's performance, including enforcement of standards, was non-performing. It's recommended to establish an FSM set-up including a standing committee at the city corporation level with

clear roles & responsibilities for service delivery, regulation, financing & monitoring with sufficient capacity & manpower, including funding. It's necessary to formulate a standard by-law for FSM that needs to be practiced by each city.

- The city authority should take immediate action to stop the sewerage connection of households and any establishment with the drain. The City Corporation should conduct a mobile court against this type of offense. If it's not included within the jurisdiction of the mobile court, then proper steps must be taken to include it.
- The City Corporation should come forward to formulate the by-law on FSM immediately.

b) Pourashava Level

- It should be mandatory to constitute the WASH-FSM standing committee at the Pourashava level.
- Each Pourashava should follow the *Fecal Sludge and Sanitation Guidelines, 2023*, and they should formulate the by-law based on their experience by following this guideline.
- The Pourashava authority should take immediate action to stop the sewerage connection of households and any establishment with the drain.

c) Union Parishad Level

- It's better to reduce the number of standing committees at the Union Parishad (UP) level to function smoothly with its limited resources and manpower.
- It's needed to include sanitation & hygiene, including FSM, at the Union Parishad level.
- UP should start practicing penalizing the offenders prescribed in the 5th schedule of its Act.
- Local relevant government authorities should strictly follow the guidance of the UP Act to ensure that they perform their duties while sitting in the UP.
- The UP authority should start an awareness program that does not dispose of the sewerage in an open field or any drain. Each latrine should have at least a twin pit with a septic tank.
- UP can create provisions to collect WASH tax by involving the people with motivation & campaigns.

d) For all Three Levels of LGIs

- It's essential to take proper measures for awareness of the Bangladesh Water Act, Bangladesh Water Rules, Pro-poor Strategy (BNBC, 2000); the NAP of Bangladesh, Strategies and Technical Guidelines; the Climate-Resilient Water Supply and Sanitation Services for Pourashava in Bangladesh, etc.
- Each LGI should take part in a crash program to survey sanitation coverage to stop open defecation. A massive awareness program should be run focusing the disposal of fecal sludge in a safe mode, and at least a provision of the septic tank.
- Based on the Institutional and Regulatory Framework for Fecal Sludge Management (FSM), 2017, the National Action Plan was framed in 2020. It's assumed that this plan would help achieve SDG 6.2.
- Each organization should create provisions to promote menstrual hygiene and its disposal management, including gender-responsive planning & implementation of WASH activities.
- All the LGIs should develop a program to gradually convert single-pit latrines to off-set twin-pit latrines.
- GO-NGO collaboration needs to be strengthened to achieve the targets of the SDG and the successful implementation of WASH activities, including the formulation of new or revised policies for this sector.

3. Integrated Monitoring Information System (IMIS)

It's needed to develop a comprehensive Integrated Monitoring Information System (IMIS) for FSM, particularly waste management activities, including a roadmap for implementation, a budget for investment, and a plan for capacity building & training. This IMIS could be linked with NID and connected with households through GIS. Then it will become easier to provide services to the doorsteps of the citizens.

4. Business Model & Private Sector Engagement

Develop comprehensive & sustainable business models for waste management, including a roadmap for implementation, that will be integrated into existing waste management systems, including interoperability, scalability, and sustainability.

5. Sustainable Development Goal (SDG 6)

Regular monitoring is needed to monitor the progress of SDG 6 and the steps to be taken to establish how to determine the necessary measures for localized implementation of the SDG. Provide concrete actions to tackle poor hygiene habits and incorporate WASH objectives into national policy-making processes.

6. Infrastructure Development

To ensure safe sanitation, provide details on funding sources and financial mechanisms for infrastructure development. Document the examples of successful models for public toilet construction & maintenance and share them with the concerned stakeholders.

7. Communication Strategy

It's needed to develop a robust, goal-oriented, time-bound, and modern communication strategy to promote SMSS, FSM, and CWIS initiatives in the country. This strategy will help identify the key messages, identify the appropriate communication channels & timeline for activities, and measure the success of the strategy. With this strategy, it will be easier to plan & implement, including monitoring the activities with the involvement of relevant stakeholders, because the necessary messages have already been transmitted to them. With clear objectives, clear-cut messages should be developed for the target audience, and those will be transmitted through appropriate communication channels along with resources within the timeline. It's also important to document the successes and failures of the activities for further development. It should be a continuous process to take proper measures.

Conclusion

The proposed forward-looking recommendations aim to address matters related to SMSS, FSM, and CWIS interventions through institutional, technological, environmental & social aspects. These are not all, but part of the whole scenario. It's urgent to start a dialogue with the stakeholders, including policy-makers, about this emerging issue immediately, and it should be a cross-cutting issue for the country. So that people will understand the importance of waste management. Ultimately, some of the burden will be shared by the government, and the rest of the matter will be done by the people themselves based on their good understanding and to get a better life.

ANNEXURES

ANNEX I: HIGHLIGHTS FROM LITERATURE REVIEW

1) City Corporation

a) Regulations

Although the *City Corporation Act, 2009* seems to omit the term "fecal sludge," it does charge the City Corporation with handling "refuse" that accumulates in public restrooms, urinals, drains, and all structures and grounds. A section of the *Local Government (City Corporation) Act, 2009* describes this duty. Furthermore, as stated in Sections 120, 121, and 122 of the Act's Schedules 6, 7, & 8, the City Corporation is empowered to create rules, regulations & by-laws concerning the appropriate management of fecal sludge when it's judged essential. However, it should be noted that there is no Standing Committee on Sanitation listed among the mandatory Standing Committees for City Corporations, as stated in Section 50 of the *Local Government (City Corporation) Act, 2009*.

The Institutional and Regulatory Framework (IRF) specifies that the responsibility of Fecal Sludge Management (FSM) falls under the jurisdiction of the City Corporation, by the provision of the *Local Government* (*City Corporation*) *Act, 2009.* The City Corporation is responsible for planning & implementing FSM services, including the financial business model for service delivery. They are also allowed to collaborate with other entities such as WASA, DPHE, LGED, private sector, and I/NGOs for the planning & implementation of FSM infrastructure & services if it's consistent with the provisions of the Act.

Additionally, the City Corporation must include the provision of infrastructure, specifically treatment facilities, for the implementation of FSM services within its Master Plan. Finally, inclusive FSM planning & implementation modalities must be initiated by the City Corporation among government agencies, I/NGOs, community groups & the private sector.

b) Disposal of Sewage, Wastewater & Garbage

Based on the provided information, for the disposal of sewage, wastewater, and garbage, the City Corporation has certain responsibilities and guidelines outlined in the Institutional and Regulatory Framework (IRF). The City Corporation

is required to conduct inspections to ensure that domestic sewage, wastewater, and discharge from house drains are not connected to storm sewers, drains, or irrigation channels. Additionally, the City Corporation must ensure that refuse, including fecal sludge, is not thrown, disposed of, or stored on the street or in open places not designated for refuse disposal. These actions are considered punishable offenses under the *Local Government (City Corporation) Act, 2009.*

In carrying out their duties, the City Corporation has the option to engage the private sector or non-government sector through outsourcing to conduct inspections or surveys aimed at identifying illegal sewage, wastewater, or refuse disposal practices. This outsourcing can be considered part of their service procurement process.

c) The Fecal Sludge Collection & Transport

The City Corporation is tasked with the responsibility of ensuring proper execution of the fecal sludge management (FSM) service chain, specifically the collection and transportation processes. The City Corporation needs to carry out or oversee these operations, ensuring that they are conducted hygienically without posing any risks to the health and safety of the emptier, the public, or the environment.

Regarding the process of pit emptying, it is important to acknowledge that there are significant hazards involved. Therefore, the City Corporation should adhere to appropriate health and safety guidelines for emptying services. In the absence of specific guidelines prepared by the Local Government Division (LGD), the City Corporation should follow similar guidelines that are currently practiced or promoted elsewhere. This ensures that the emptying operations are conducted safely and responsibly.

The Local Government (City Corporation) Act, 2009, the City Corporation has the authority to establish charges for the collection and transportation of fecal sludge from sanitation facilities. If there are fecal sludge treatment facilities operating within the jurisdiction of the City Corporation, and the collected sludge is transported to these facilities for treatment, the City Corporation may consider the entire service chain (from collection to treatment) when determining the charges associated with the service. This holistic approach considers the costs and resources involved in providing comprehensive fecal sludge management services.

d) The Fecal Sludge Treatment, Disposal, & End-use in City Corporation

The responsibility for proper execution of the entire fecal sludge management (FSM) service chain, including treatment, disposal, and end-use, falls on the City Corporation. This means that the City Corporation should carry out or oversee these operations in compliance with existing rules and regulations, without negatively impacting public health or the environment. During the absence of treatment facilities for fecal sludge, the City Corporation should designate areas for disposal, such as digging pits or trenches in the ground and covering them with soil after they are filled with sludge. The City Corporation may also outsource the treatment and disposal of fecal sludge, as well as the use and marketing of end products, to private sector or non-government organizations (NGOs). The City Corporation/Local Government Division (LGD) can formulate regulations based on Section 121 of the *Local Government (City Corporation) Act, 2009*, for engaging the private sector, NGOs, and community-based organizations (CBOs) for FSM activities under Sub-section 4.2.4 of this Framework.

e) Fees & Charges

The City Corporation is empowered to establish fees and charges specifically for the treatment of fecal sludge. These charges may be determined independently or in conjunction with collection and transportation fees, as detailed in Sub-Section 4.2.4.1-5 of the Framework. This approach ensures a comprehensive and transparent financial structure for the fecal sludge management (FSM) services.

f) Tariff Structure & Business Model

A tariff structure for emptying and transportation services will be devised for consumers. Additionally, the City Corporation will develop a business model for FSM based on the recommendations of a national-level study. This strategic initiative, referenced in Sub-Clause 4.16 and 17, aligns the City Corporation's practices with the national standards outlined in the Implementation of the Institutional and Regulatory Framework (IRF) for Fecal Sludge Management National Action Plan for 2021-2030.

g) Allocation of Funds

The City Corporation commits to establishing and maintaining an allocation of funds specifically designated for FSM services. This financial commitment is outlined in Sub-Clause 4.18 of the Implementation of Institutional and

Regulatory Framework for Fecal Sludge Management National Action Plan for 2021-2030. This demonstrates the City Corporation's dedication to sustaining and improving FSM services through adequate financial provisions.

In summary, the outlined provisions illustrate a structured and forward-thinking approach by the City Corporation toward the management of fecal sludge. The document reflects a commitment to financial transparency, adherence to national standards, and the continuous allocation of resources to ensure the effectiveness of FSM services.

2) Pourashava

a) Legal Basis & Responsibilities

The Local Government (Pourashava) Act, 2009, specifies Pourashava's responsibilities, particularly in infrastructural development and the provision of Pourashava services, including FSM. The mention of improper disposal as an offense reinforces the seriousness of adhering to the regulations.

b) Taxation Authority

The reference to the Local Government (Amendment) Act, 2010, granting Pourashavas the authority to impose taxes with government approval, is clear. The inclusion of the Pourashava Model Tax Schedule for sanitation rates provides transparency on how taxes related to FSM are determined, enhancing the understanding of the financial aspects.

c) Committee Formation & Planning

The text effectively highlights the mandatory formation of a Standing Committee on "health, water, and sanitation" and its role in overseeing FSM activities. The emphasis on inclusive planning involving various stakeholders, as per the Institutional and Regulatory Framework (IRF) of 2017, aligns with contemporary practices for comprehensive urban sanitation planning.

d) Service Chain & Outsourcing

The text effectively highlights the mandatory formation of a Standing Committee on "health, water, and sanitation" and its role in overseeing FSM activities. The emphasis on inclusive planning involving various

stakeholders, as per the Institutional and Regulatory Framework (IRF) of 2017, aligns with contemporary practices for comprehensive urban sanitation planning.

e) Fecal Sludge from Onsite Facilities

The statement assigning responsibility to Pourashavas for sludge from onsite sanitation facilities is straightforward and aligns with the logical progression of their duties in FSM.

f) Fee Determination & Subsidy

The inclusion of a mechanism for determining the emptying fee based on volumetric pumping rate and other considerations adds specificity to the financial aspects. The reference to subsidy provisions for the hardcore poor, as per the Pro-poor Strategy for the Water and Sanitation Sector in Bangladesh (2008), demonstrates a commitment to inclusivity.

g) Land Allocation

The directive for local government institutions (LGIs) to allocate land for fecal sludge treatment and disposal aligns with broader national strategies, as indicated by the reference to the National Strategy for Water and Sanitation in 2014.

3) Rural Areas

a) Regulations in Union Parishads

The text appropriately highlights the absence of sanitation in the listed functions of the Second Schedule of the Local Government (Union Parishad) Act, 2009. This sets the context for the subsequent discussion on the roles and responsibilities outlined in the Institutional and Regulatory Framework (IRF) for FSM in Rural Areas, 2017.

b) Institutional Roles & Responsibilities

The delineation of roles and responsibilities in Sub-section 4.2.1 of the IRF is clear and comprehensive. It appropriately assigns responsibilities to the Union Parishad (UP) and the Upazila Parishad, emphasizing collaboration with various stakeholders, including government agencies, non-governmental organizations (NGOs), community groups, and the private sector.

c) Standing Committee & Awareness Campaigns

The mention of the formation of a Standing Committee (as per Sub-section 4.2.2) to oversee activities related to FSM enhances the organizational structure. The emphasis on awareness campaigns led by the Ward Committee and UP, promoting sanitation options and emerging technologies, demonstrates a proactive approach to public education.

d) Collection & Transport of Fecal Sludge

The section on collection and transport of fecal sludge outlines a comprehensive inspection process involving the Union Parishad, Ward Committees, and the Upazila Sanitary Inspector. The reference to legal consequences for failure to dispose of fecal matter properly adds weight to the importance of adherence.

e) Safety Measures & Integration of Communities

The UP's commitment to promoting safety measures, including personal protective equipment (PPE) and mechanical emptying, reflects a concern for the health and safety of those involved in FSM. The focus on integrating manual emptier communities into mechanical emptying services through training and support shows a balanced approach to technology adoption without negatively impacting livelihoods.

f) Financial Aspects & Stakeholder Consultation

The text appropriately mentions the UP's authority, in consultation with relevant stakeholders, to fix or charge for pit emptying, transportation, and disposal. This demonstrates financial autonomy and aligns with the collaborative approach involving key stakeholders.

g) Fecal Sludge Treatment, Disposal & End-use in Rural Areas

As per the 2nd schedule of the Local Government (Union Parishad) Act, 2009 (Functions of Union Parishad), 39 functions are listed, but sanitation is not on this list. Whereas the Union Parishad (UP) is responsible for managing fecal sludge generated in households and institutions within its jurisdiction, the UP collaborates with the Department of Public Health Engineering (DPHE), the private sector/non-government sector, and other stakeholders in planning and implementing FSM activities. Inclusive FSM planning and implementation modalities are initiated by the UP among

various government agencies, I/NGOs, community groups, and the private sector. A Standing Committee oversees FSM activities, and under the leadership of the UP and Ward Committee, awareness campaigns are conducted to promote different sanitation options and emerging technologies that reduce or eliminate the handling of fecal sludge.

Institutional Roles and Responsibilities for Fecal Sludge Management (FSM) in Rural Areas, 2017, the Union Parishad (UP) is responsible for managing fecal sludge generated in households and institutions within its jurisdiction. The UP collaborates with the Department of Public Health Engineering (DPHE), the private sector/non-government sector, and other stakeholders in planning and implementing FSM activities. Inclusive FSM planning and implementation modalities are initiated by the UP among various government agencies, I/NGOs, community groups, and the private sector. A Standing Committee oversees FSM activities, and under the leadership of the UP and Ward Committee, awareness campaigns are conducted to promote different sanitation options and emerging technologies that reduce or eliminate the handling of fecal sludge. It was found that practical guidance is needed in the absence of a fecal sludge treatment facility. The option to bury fecal sludge in designated areas within household premises or UP-designated land for compost production is clear and aligns with sanitation practices in resource-constrained settings. Additionally, the mention of transporting fecal sludge to the nearest treatment facility, such as a City Corporation or Pourashava, demonstrates a consideration for alternatives. It is concluded that a strategy for fecal sludge management in rural areas, emphasizes awareness, resource recovery, and practical solutions in the absence of treatment facilities. The collaborative approach involving various stakeholders enhances the feasibility and effectiveness of the outlined initiatives.

4. Institutional Arrangements: Ministries & Divisions

a) Ministry of Environment, Forest & Climate Change

As per the current practice, the Ministry of Environment, Forest, and Climate Change is responsible for matters related to the environment and ecology, which generally include protection and conservation efforts. However, sanitation is mentioned in the allocation of business of the Local Government Division (Environment and Ecology) (sl. no. 1 of the allocation of business) and matters related to environmental control (sl. no. 2 of the allocation of business).

To ensure effective coordination and implementation of sanitation policies and programs, it would be important to clarify and align the roles and responsibilities of the Ministry of Environment, Forest, and Climate Change and the Local Government Division. This could involve engaging both ministries and divisions in policy dialogue and collaborative decision-making processes.

Additionally, it is essential to engage all relevant stakeholders, including the Ministry of Environment, Forest, and Climate Change, the Local Government Division, and other concerned ministries and divisions, in discussions and consultations to address any gaps in policy implementation concerning CWIS/SMSS.

By promoting open dialogue and collaboration, it will be possible to achieve equitable and inclusive sanitation practices in line with national policies and strategies.

b) Ministry of Health & Family Welfare

Specifically, the Health Services Division has responsibilities related to sanitation, including the sanitation of hospitals, clinics, diagnostic centers, community clinics, and dispensaries. This is an important mandate, as proper sanitation practices in healthcare facilities are essential for the prevention of infections and the promotion of public health.

In addition to sanitation, the Ministry is also responsible for international aspects of medical facilities and public health, including international sanitary regulations, port health, and health and medical facilities abroad. This indicates a broader commitment to ensuring health and hygiene in various settings.

Furthermore, the Ministry has provisions for motivation and the preparation and development of publicity media about public health and awareness. This highlights a proactive approach to promoting public health initiatives and creating ac) awareness among the general population.

Overall, it is encouraging to see that the Ministry of Health and Family Welfare has clear allocations of business related to sanitation and public health. This provides a solid foundation for the implementation of effective sanitation policies and programs, which are crucial for the well-being of the population.

c) Medical Education & Family Welfare Division

Specifically, the Medical Education and Family Welfare Division handles the registration of births and deaths, as mentioned in the allocation of business. Birth and death registration is an essential administrative task for maintaining accurate demographic data, which can be valuable for health planning and public health initiatives. It is worth noting that while the Health Services Division of the Ministry of Health and Family Welfare addresses public health matters, including sanitation, the specific mention of hygiene is not found in the allocated responsibilities. However, hygiene is closely related to public health, and it is important to consider its importance within the context of the ministry's overall objectives. WASH-related matters are dealt with by the Local Government Division (LGD). This suggests that water, sanitation, and hygiene issues are handled separately from the specific responsibilities allocated to the Medical Education and Family Welfare Division.

Considering the interconnections between public health, hygiene, and various aspects of healthcare administration, it might indeed be worth revisiting the allocation of business to address any perceived anomalies. This would ensure a more comprehensive and coordinated approach towards improving public health, sanitation, and hygiene in the country. While the Medical Education and Family Welfare Division's allocation of business includes birth and death registration, there seems to be potential for further integration or collaboration to address hygiene-related matters within the broader context of public health. Taking this into consideration would help create a more holistic approach to healthcare and ensure the well-being of the population.

d) Ministry of Local Government, Rural Development, & Cooperatives

The Ministry of Local Government, Rural Development, and Cooperatives, especially LGD, and its allocation of business related to safely managed sanitation. It seems that the Local Government Division (LGD) within this ministry has specific responsibilities towards water, sanitation & sewerage systems.

The Local Government Division has been assigned the task of handling matters about drinking water and the development of rural water supply, sanitation & sewerage systems. These responsibilities indicate that the LGD is fully responsible for performing the roles & responsibilities associated

with WASH (water, sanitation, and hygiene). The focus on drinking water & rural development suggests a commitment to addressing the challenges faced by rural areas in terms of access to safe & clean water sources, sanitation facilities, and appropriate wastewater management. There seemed to be some ambiguity and duplication of responsibilities among ministries and divisions concerning WASH-related matters. Specifically, hygiene & drainage are not explicitly mentioned in the allocation of business for the LGD or other related ministries or divisions.

To avoid confusion and duplication of efforts, it's essential to have clear coordination & participation among the relevant ministries & divisions. This will enable a more efficient & effective approach towards achieving the Sustainable Development Goals (SDGs) related to water, sanitation, and hygiene. In summary, while the Local Government Division within the Ministry of Local Government, Rural Development & Cooperatives has allocated responsibilities for drinking water and the development of rural water supply, sanitation, and sewerage systems, it is important to ensure clear communication and collaboration among all stakeholders involved in WASH-related matters. This will help avoid duplication, address any gaps, and promote a coordinated effort towards achieving the SDGs related to water, sanitation, hygiene, and drainage across the country.

e) 8th Five-year Plan

The government introduced the 8th Five-Year Plan (July 2020- June 2025) in December 2020, which serves as a comprehensive macroeconomic and policy framework aimed at achieving the Sustainable Development Goals (SDGs). Notably, the plan demonstrates a strong commitment to addressing WASH (Water, Sanitation, and Hygiene) as a cross-cutting issue on the government's agenda, thanks to the persistent efforts of WASH actors.

The plan effectively outlines strategic measures, including the development of a strategic plan, the implementation of appropriate and affordable technologies, enforcement actions against polluters, the exploration of alternative options for drinking water, and the formulation of a sewerage master plan. Additionally, the plan emphasizes the expansion of FSM (Fecal Sludge Management) by creating an enabling environment.

Furthermore, the government actively encourages the involvement of the private sector and NGOs in the WASH sector. Although FSM still faces challenges in gaining popularity within the country, the government is taking

proactive steps by leveraging its projects, collaborating with development partners, engaging NGOs, and fostering private sector participation. It is particularly encouraging to note that the inclusion of a successful FSM case study in the plan serves as a valuable good practice example.

It is mentioned that the Institutional Regulatory Framework for FSM (IRF-FSM) was published earlier through the Policy Support Branch (PSB) of LGD to implement and regulate FSM activities nationwide. With the following of this initiative, DPHE has already established an FSM Support Cell for planning, designing, and monitoring the FSM activities and scaling up under the 8th five-year plan.

It is clearly understood that a comprehensive institutional arrangement is already in place in the 8th Five-Year Plan related to WASH initiatives in Bangladesh. It is also needed that there be good and well-coordinated coordination among ministries, acknowledgment of existing challenges, and appreciation of the efforts made in the development and implementation of the 8th Five-Year Plan.

The proposed action plan by the Government of Bangladesh, aligned with SDG 6, outlines specific outcomes and targets as follows:

By 2020, Bangladesh aims to achieve 100% water supply coverage in both urban and rural areas, ensuring access to safe and equitable water for all.

By 2030, the country targets achieving 90% hygienic sanitation coverage, with particular attention to the physically challenged and socially excluded populations.

Groundwater sources' safe yield and preservation will be ensured by 2020 through appropriate actions, as per the existing Water Act, with continuous monitoring up to 2030.

Tracking the percentage of the population using handwashing facilities with water and soap, categorized by location (home, school, health center), is also part of the plan.

It is understood about the progress, challenges, and initiatives related to SDG 6 in Bangladesh. It highlights both achievements and areas needing improvement, outlines government commitments, even the inclusion of manual sweeper involvement, and provides specific targets with timelines.

f) WASH Budget

The allocation for the WASH sector was Tk14,517 crore or 5.44% of the total ADP allocation (Tk 266,793 crore) in FY 2021-22 (PPRC). On the other hand, the country's total WASH expenditure at the household level was Tk 59,753.3 crore in 2020, which is 2.18% of the country's gross domestic product (GDP) (National WASH Account 2020). Of the amount, each household spent Tk 1,502 was for water, Tk 1,985 for sanitation, and Tk 8,087 for hygiene, which is 4.3% of the annual household income.

As per the publication of National Wash Accounts, a person spends Tk 2093 on hygiene, Tk 500 on water, and Tk 898 on sanitation. Which is too much. About 60% of the total WASH expenditure is spent on hygiene, 26% on sanitation and 14% of the total wash cost is spent on potable water.

Therefore, 2.4% of the population of Bangladesh is still deprived of access to safe drinking water. About 70% of the population uses tube wells to collect drinking water. About 10% of the population has access to tap or piped drinking water, most of whom live in cities. Most of the urban dwellers depend on water supplied through large networked systems. In 2020, the cost of WASH for those living in urban areas was Tk 2,200 crore. During the same period, the rural population spent Tk 4,970 crore on this sector, with 79% of the expenditure being used for pumping water by hand or motorized pumps.

Meanwhile, about 99% of Bangladesh's population uses flush/pour flush or pit latrines. The rates of pit latrine users and flush/pour flush users are about the same, at 48% and 51% respectively. In 2020, approximately 26% of the total WASH expenditure, or Tk 15,300 crore was spent on sanitation services, of which Tk 7,980 crore was spent in rural areas and Tk 5,750 crore in urban areas.

The LGIS (Local Government Institutions) have a policy in place that mandates adherence to the upper and lower limits of their budget line. Many LGIs strive to comply with these guiding principles. However, it is important to note that these limits are not substantiated by any study, or research, or aligned with the specific demands of each LGI.

Therefore, it is necessary to conduct a comprehensive study to determine the sectoral limit of the budget that aligns with the unique needs of each LGI. It is also important that each LGI should increase their WASH budget gradually to combat water-borne diseases and ultimately it will help increase the nutrition level of the country.

g) Sustainable Development Goal (SDG 6)

It discusses Bangladesh's progress and challenges related to Sustainable Development Goal (SDG) 6, which focuses on water and sanitation. The 2017 Joint Monitoring Programme report by the World Health Organization (WHO) and UNICEF revealed that open defecation in Bangladesh had reduced to 0%, marking a significant achievement considering it was at 34% in 1990. However, Bangladesh fell short of meeting the Millennium Development Goal (MDG) of halving the population without access to improved sanitation by the 2015 deadline. A substantial portion of the population, particularly in remote areas and among socio-economically vulnerable groups, still lacks proper sanitation facilities.

Furthermore, untreated fecal sludge being released into the environment is causing a sanitation crisis across the country, affecting villages, small towns, and big cities. Manual sweepers often clean up septic or pit waste and dispose of it in open water bodies, leading to the reintroduction of fecal matter into the environment. Bangladesh has the potential to set an example for a sanitation revolution. The state has made commitments on sanitation in SACOSAN VI and the 7th Five-Year Plan. In April 2016, the UN Secretary-General Ban Ki-moon and the President of the World Bank Group Jim Young Kim launched an 11-member High-Level Panel on Water (HLPW) to drive urgent action toward SDG 6 and related targets, with the Prime Minister of Bangladesh, nominated as a member.

ANNEX II: DETAILS ON Focus Group Discussions (FGDs)

To gather insights from the field and relevant stakeholders regarding WASH policies, programs, and budget allocation and to identify key gaps in policy implementation and mapping about equitable and inclusive SMS/FSM/CWIS, several face-to-face and virtual FGDs were organized. The following are highlights of outcomes from the Focus Group Discussions:

1) FGD with Local Community in Gaibandha District

A Focus Group Discussion (FGD) was conducted on 29th August 2023 at the SKS Office, Gaibandha, to explore the perspectives and awareness levels regarding sanitation and hygiene among female representatives, leaders, female workers, and inhabitants in the community. The FGD was facilitated by M. Shafiqul Islam, the consultant of the assignment, through an interactive session. The FGD provided valuable insights into the participants' perspectives on sanitation and hygiene, highlighting areas of awareness and knowledge gaps. It also identified critical priorities and suggested actionable steps for improving sanitation practices in the community. Further education and collaboration with stakeholders will be essential to addressing the sanitation challenges discussed during this session.



Reflection on the FGD

Participants offered diverse definitions of sanitation, like 'Healthy Toilet', a safe and healthy environment for families, and safe latrines with cleanliness, odor prevention, and the availability of soap, water, and tissue'. Participants shared their thoughts on hygienic latrines, associating them with cleanliness, lack of odor, proper waste containment, and the availability of soap, water, and tissue. Participants reinforced the concept of safely managed sanitation, focusing on safety, health, awareness, and disease prevention. Most of the participants learned about the term "inclusive" through the NGO, SKS and recognized its importance in involving diverse groups. Most of them were unaware of sanitation-related laws, including Pourashava laws from 2009 and environmental laws related to hygienic waste management. Participants had heard of the Sustainable Development Goals (SDGs) but lacked detailed knowledge, indicating a desire for further training. Few participants were aware of the specific sanitation targets within the SDGs.

2) FGD with Community Representatives & students in Barisal City Corporation

A Focus Group Discussion (FGD) was held on 7 September 2023 at the AVAS Office, Barisal City Corporation. The discussion aimed to gather insights on sanitation and hygiene perspectives and awareness levels among various stakeholders, including city corporation representatives, journalists, ward councilors, and NGO and CBO representatives. AVAS and SKS organized the FGD, and M. Shafigul Islam facilitated the interactive session. The FGD revealed a complex landscape of sanitation awareness and challenges in Barisal City Corporation. Participants emphasized the need for increased awareness, stakeholder commitment, and comprehensive initiatives to address sanitation issues effectively. A multi-pronged approach involving various stakeholders and improved enforcement of existing laws is crucial for sustainable sanitation in the region. A significant number of recommendations were made that should serve as a comprehensive framework for addressing the sanitation challenges in Barisal City Corporation and improving overall hygiene practices for the benefit of the community's health and well-being.



Reflection on the FGD

Participants provided varied definitions of sanitation, emphasizing cleanliness, disposal, health, safety, and waste management without pollution. Hygienic latrines were described as odorless and fly-free, with sufficient water and cleanliness. However, issues were reported with public toilets in Barisal. They described safely managed sanitation as waste sorting, safe treatment, and the production of manure without pollution or harm to people. A few participants understood the term "inclusive" in the context of ensuring access to toilets for all. The concept of city-wide inclusive sanitation, which ensures access for all, was discussed, emphasizing its importance. Some participants were aware of the SDGs, including sanitation targets.

The reported sanitation rate in Barisal City Corporation ranged from 20% to 75%, with varying perceptions among participants. Some cited budget constraints and a lack of awareness as challenges. Approximately 70% of latrines in public and private institutions were deemed hygienic, especially in private institutions, colleges, and offices. Approximately 70% of households in the city corporation area had sanitary latrines. Shared latrines were primarily found in slum areas, with a reported rate of 25%. Participants reported no open defecation in the city corporation area. Sanitation facilities were not women, children, elderly, or disabled-friendly, with examples provided.

3) FGD with Sanitary Entrepreneurs & Workers, and Social Organizers in Barisal City Corporation

A Focus Group Discussion (FGD) was conducted to assess the perspectives and awareness levels regarding sanitation and hygiene among key stakeholders, including sanitary masons, sanitary equipment businessmen, and social organizers. The primary goal was to gather insights into different aspects of sanitation and hygiene and identify potential areas for improvement. Challenges included shared latrines, inadequate waste management, and a lack of awareness regarding climate change's impact on sanitation. The current system was considered unfriendly to women, children, the elderly, and people with disabilities, necessitating significant improvements. The recommendations address the challenges identified in sanitation and hygiene awareness and propose actionable steps to improve the overall sanitation situation in the Barisal City Corporation. Collaboration among stakeholders, strong enforcement of laws, and awareness campaigns are essential for successful implementation.



Reflection on the FGD

Participants described sanitation as cleanliness of the environment and surroundings, health safety, and safe water. Safely managed sanitation was defined as waste not being disposed of in the environment and its proper management by the city corporation while ensuring human safety. City-wide inclusive sanitation was defined as latrines accessible to all citizens, including females, children, and people with disabilities. However, few were aware of the concept. Participants identified hygienic latrines as those that prevent

feces from being visible, have no odor, and do not contaminate water. Very few people were familiar with the term "inclusive." Participants suggested that inclusive sanitation should consider people with disabilities and promote a friendlier environment. Only a few participants were aware of the Sustainable Development Goals (SDGs), and very few participants knew sanitation-related laws.

4) FGD with Civil Society Representatives in Sreemangal Pourashava, Moulvibazar

A Focus Group Discussion (FGD) was conducted on September 20, 2023, at the pouurashava meeting room of Sreemangal to assess the awareness levels and perspectives on sanitation and hygiene among various stakeholders, including Pourashava representatives, journalists, ward councilors, female councilors, and representatives from NGOs and CBOs. MAC Bangladesh and SKS organized the FGD, and M. Shafiqul Islam facilitated the interactive session. The primary goal was to gain insights into different aspects of sanitation and hygiene and identify areas for improvement. A few recommendations came to address the identified challenges and promote safely managed and inclusive city-wide sanitation in the Pourashava through collaboration among government bodies, NGOs, and community members. Further efforts are needed to improve sanitation and hygiene awareness and implementation.





Reflection on the FGD:

Participants described sanitation as involving hygienic toilets, safe water, cleanliness, proper waste disposal, and handwashing facilities. Few participants were aware of the concept of safely managed sanitation (SMS). Very few participants were familiar with sanitation laws, making it challenging to identify gaps. Only 2% of participants were aware of the Sustainable Development Goals (SDGs).

The Pourashava had a low sanitation rate, with only 10% of households having safe sanitation facilities. Proper sanitation was not being implemented according to existing laws. Many lacked septic tanks, and those who had them often had outlets connected to nearby drainage systems. Toilets in public and private institutions were generally not safely managed, with less than 10% meeting sanitary standards. Around 90% of household-level latrines were twin-pit, while only 2% were temporary structures (kacha). Approximately 5% of the population practiced open defecation, primarily in areas near hilly streams, leading to water pollution.

5) FGD with Community Representatives in Sreemangal Pourashava, Moulvibazar

A Focus Group Discussion (FGD) was conducted to assess the perspectives and awareness levels regarding sanitation and hygiene among key stakeholders, including sweepers, Pourashava sanitation workers, public

toilet leaseholders, and NGO workers (IDEAs). M. Shafiqul Islam facilitated the interactive session. The primary goal was to gather insights into different aspects of sanitation and hygiene and identify potential areas for improvement. These recommendations address the identified challenges in sanitation and hygiene awareness and emphasize measurable conditions for improved living standards and sanitation practices in Pourashava. Collaboration between stakeholders and government intervention is crucial to implementing these recommendations effectively.



Reflection on the FGD:

Participants defined sanitation as clean and safe latrines. Participants believed hygienic latrines should have water for defecation and soap, but they noted that 90% of latrines in their area were unhygienic. There was no response regarding awareness of the term "inclusive." None of the participants had heard of the Sustainable Development Goals (SDGs). No participants were aware of the sanitation targets within the SDGs. There was no open defecation reported in the area.

Approximately 90% of households have sanitary latrines. However, all outlets were directly connected to drainage systems. Two latrines are being shared by 50 families in *Horijon Polli*, which was considered unhygienic and structurally vulnerable. Latrine Structures: About 50% of latrines had one pit, while the other 50% had two pits. Latrine cleaning is done by the users themselves, who empty the pits into tanks. Some individuals requested the *"Horijons"* (sweepers) to dispose of the waste in drains. In approximately 90% of cases, the excreta are not properly contained within the latrines, resulting in bad smells and the spread of flies.

ANNEX III: Details ON KEY INFORMANT INTERVIEW (KII)

To gather intellect from the key experts from different stakeholders regarding WASH policies, programs, and budget allocation and to identify key gaps in policy implementation and mapping about equitable and inclusive SMSS/CWIS, a few face-to-face interviews (KII) were conducted. The following are highlights from those discussions :

1) Barisal City Corporation

Discussion with CEO

The discussion with the Chief Executive Officer (CEO) revealed positive aspects of sanitation activities in the Pourashava with the implementation of safely managed sanitation programs. The condition of latrines in both public and private institutions is reported to be good. However, city-wide inclusive sanitation programs are not currently in place. The CEO highlighted the need for amending existing laws or introducing new ones. Both the wash and cleanliness branches operate in the Pourashava, overseeing door-to-door waste collection and disposal. Challenges include a lack of necessary equipment and the need for proper training for waste management personnel. Interestingly, while sweepers clean household latrines, the Paurashava has no role in these processes. Additionally, there is a lack of information about government or organizational initiatives on sewage management. The CEO emphasized the necessity for Pourashava authorities to conduct sanitation awareness activities in response to disasters and climate change.

Discussion with DDLG

The Deputy Director, Local Government (DDLG) expressed a lack of clarity regarding the Local Government (Pourashava) Act, 2009. While acknowledging the sufficiency of sanitation-related laws and regulations in Bangladesh, the DDLG emphasized the critical need for improved implementation. In Pourashava, activities aligned with the Sustainable Development Goals (SDGs), such as water supply, sanitation, food quality auditing, and primary education, are underway. However, the DDLG highlighted shortcomings in the existing solid waste management system, emphasizing the necessity for a more inclusive approach. On a positive note, the DDLG believes in the feasibility of digitizing the Pourashava budget, foreseeing enhanced transparency in budget income and expenditure through this digital transformation.

2) Gaibandha District

a) Discussion with the PNO, Gaibandha Paurashava

Mr. Md. Abdul Hanif Sarder, the Paura Nirbahi Officer of Gaibandha Paurashava, provided comprehensive insights into the sanitation landscape in Pourashava. The status indicates strong performance, with 93% fecal sludge management and 91% sanitation coverage. Safely managed sanitation programs are partially implemented, and while half of the latrines in public and private institutions are inclusive, proper management is lacking. Female menstrual and sanitary pad disposal management is absent in most institutions, except for a few schools. City-wide inclusive sanitation programs are underway, but there is a significant gap in the proper implementation of sanitation-related laws. Activities aligned with the Sustainable Development Goals (SDGs) are being carried out. However, there is a shortage of manpower as per the organogram for WASH activities, and the existing workforce is deemed inadequate. Ongoing WASH projects like "Rising for Rights" are in progress, and organizations such as DSK, ESDO, and BRAC are actively engaged in WASH activities. The Pourashava relies on Pourashava tax and government funds as revenue sources for Pourashava WASH, with a budget allocation of 1 million taka. However, the current budget is considered inadequate compared to the requirements. Solid waste management, handled through vans and trucks, faces challenges with a lack of existing programs for treatment and disposal. The main challenge in the solid waste management system is the lack of safe management. Households perform manual cleaning of latrines when filled with feces. The Paurashava plays a role in latrine cleaning. Challenges in the Pourashava WASH program include non-compliance with rules, a fund crisis, and a lack of equipment. The Paura Nirbahi Officer emphasizes the need for Pourashava authorities to conduct sanitation awareness activities in response to disasters and climate change.

b) Discussion with the Chief Executive Engineer, Gaibandha Paurashava

Mr. Md. Rezaul Haque, the Executive Engineer of Gaibandha Paurashava in Gaibandha Sadar Upazila provided an overview of sanitation activities in the Pourashava. The status is reported to be 80% good, with safely managed sanitation programs partially implemented. The condition of latrines in both public and private institutions is deemed good. However, there is insufficient manpower as per the organogram for conducting WASH activities, and it is considered not feasible to operate WASH with the current workforce. Although there are no ongoing WASH projects in the Pourashava, some NGOs are involved in the sector, particularly in latrine installations and awareness-raising. Notably, the Paurashava lacks a specific WASH branch, having only a cleanliness branch. While there are initiatives related to solid waste management, challenges include a shortage of manpower, equipment, vehicles, and the need for a landfill. Household latrine cleaning relies on vacuum trucks and conservancy workers, but there is a shortage of manpower, infrastructure, and transport for feces cleaning. The Paurashava has plans for its Pourashava WASH program, requiring a tentative 1 million USD. Challenges include the lack of awareness, and the Paurashava acknowledges the need for sanitation awareness activities, especially in response to disasters and climate change.

c) Discussion with Assistant Engineer, DPHE, Sagatha Upazila, Gaibandha

The Assistant Engineer of the Sagatha Upazila in Gaibandha District provided insights into the sanitation activities in the Pourashava, describing the status as moderately good. Safely managed sanitation programs are in place, and the condition of latrines in both public and private institutions is reported as moderately good. The executive engineer confirmed that there is sufficient manpower as per the organogram for conducting WASH activities, and it is feasible to operate WASH with the current workforce. Additionally, there is a World Bank-funded project focusing on WASH for human capital development, and other organizations are primarily engaged in awareness campaigns related to WASH. While there are separate wash and cleanliness branches, there is currently no solid waste management in the Upazila. Challenges include a lack of manpower, infrastructure, and transport for feces cleaning. The absence of information on government or organizational initiatives for waste management is noted. The main obstacle identified is the insufficient budget for Pourashava WASH programs. Notably, there are no defined short-term or long-term plans for the Pourashava WASH program, highlighting a need for Pourashava authorities to prioritize sanitation awareness activities in response to disasters and climate change.

d) Discussion with the Chairman, Muktinagar UP, Sagatha Upazila

The Chairman of Muktinagar Union Parishad in Sagatha Upazila, Gaibandha District, provided valuable insights into the sanitation landscape. The sanitation rate in the union stands at 70%, with WASH activities conducted through DPHE. However, there is a notable lack of manpower, according to the organogram, making it impossible to operate the WASH effectively. Currently, there are no ongoing WASH projects or initiatives in the union,

and no other organizations are engaged in WASH activities. Coordination issues exist between the wash and cleanliness branches. While laws and regulations related to sanitation are deemed sufficient, implementation and enforcement are lacking. The absence of a city-wide program for inclusive sanitation is noted, along with challenges in rule implementation and budget allocation. The main revenue source for the union is the ADB project, but the allocated budgets for WASH and cleanliness activities, 50,000 taka and 28,000 taka respectively, are considered insufficient. Solid waste management involves scattered dumping in the union, and challenges include a lack of funds and a specific dumping site. Feces from households are dumped in nearby areas due to a lack of manpower, infrastructure, and a transport system for proper disposal. There is no information on government or organizational initiatives for sewage management. The union lacks short-term and long-term plans for WASH activities, citing the need for a budget for plan execution. The Chairman emphasizes the necessity of sanitation awareness activities in response to disasters and climate change.

4) Moulvibazar District

a) Discussion with the Executive Engineer, Sreemangal Pourashava

In the discussion with the Executive Engineer of Sreemangal Pourashava, it was revealed that the Pourashava currently has 70% coverage of safe water and sanitation, with moderately good conditions of latrines in public and private institutions. However, the implementation of safely managed sanitation programs is only partial due to inadequate manpower as per the organogram for WASH activities. Only 30% of WASH activities are operational with the current staff. The Pourashava has ongoing WASH projects, including public toilets, waste cleaning, and initiatives for the disabled and women. Other organizations, like MAC Bangladesh, are involved in awareness-raising, skill development, advocacy, and training related to WASH. Solid waste management is partly done in the Pourashava, but there is a lack of technology and equipment. Existing programs include dustbin installations in each ward and markets for organic and inorganic waste collection. Challenges in solid waste management include insufficient manpower, lack of land for waste dumping, modern technologies, and budget constraints. Latrines are cleaned by households when filled with feces, but there is a shortage of manpower, infrastructure, and transport for proper disposal. The Pourashava faces obstacles in implementing the WASH program, including a lack of manpower, land for waste dumping, modern technologies, an adequate budget, and poor planning. Short-term and long-term plans

require a budget of 100 million taka. Additionally, there is a need for sanitation awareness activities in response to disasters and climate change. Despite some challenges, there are no ongoing government or organizational initiatives on waste management, and previous attempts were postponed due to land-related disputes.

b) Discussion with the Chief Executive Officer, Sreemangal Pourashava

The Chief Executive Officer (CEO) provided key insights into the sanitation scenario in the Pourashava. According to the CEO, there is a commendable 98% coverage of safe sanitation systems, with both public and private institutions maintaining good latrine conditions. However, only 20% of these institutions have implemented female menstrual management and sanitary pad disposal programs. The CEO highlighted the inclusivity of public toilets for females and disabled individuals. Despite ongoing sanitation activities aligned with the Sustainable Development Goals (SDGs), there is a lack of manpower as per the organogram for WASH activities, and the current budget of 1,50,000 taka is deemed insufficient. Solid waste management faces challenges, including a shortage of manpower, equipment, suitable land, and technology. While there are plans to install PVC dustbins, there is currently no waste collection or treatment facility in the Pourashava. The CEO emphasized the need for improved legislation, enforcement, and awareness, especially in the face of disasters and climate change. Overall, short-term, and long-term plans for the Pourashava WASH program require an estimated 0.5 million USD for effective implementation.

c) Discussion with the Panel Mayor, Sreemangal Pourashava

Mr. Kazi Abdul Karim, Panel Mayor of Srimangal Paurashava, provided a comprehensive overview of water, sanitation, and hygiene (WASH) issues in the Pourashava. Despite achieving a commendable 75% coverage in safely managed sanitation, challenges include inadequate manpower hindering effective WASH activities. The Pourashava's WASH initiatives focus on water supply, drainage construction, and solid waste cleaning, with ongoing projects promoting inclusive practices. External organizations like MAC Bangladesh and FANSA BD contribute to WASH through awareness campaigns and skill development. Challenges identified include the separation of WASH and cleanliness branches, leading to coordination

issues, insufficient laws, and budgetary constraints. The Pourashava relies on diverse revenue sources, but the allocated budget of 1 lac USD is deemed insufficient. Solid waste management faces critical challenges due to a lack of technology, equipment, and skilled manpower. Plans involve short-term and long-term strategies with an estimated budget requirement of 3 to 5 lakhs USD. Mr. Kazi Abdul Karim emphasized the need for sanitation awareness, particularly in disasters and climate change, calling for NGO support to strengthen Pourashava efforts in public health and environmental management.

5) International Training Network Centre (ITN), BUET, Dhaka

The key informant interview discussions with a representative of ITN BUET shed light on various facets of sanitation laws and policies, particularly in the context of Citywide Inclusive Sanitation (CWIS) in Bangladesh. The insights revealed a disparity in awareness among Pourashava officials, with established employees generally well-versed in WASH issues compared to their newer counterparts. While existing laws were deemed sufficient, their implementation was identified as lacking. Stakeholders, including governments and Pourashava authorities, were recognized as pivotal in driving CWIS, with an emphasis on community involvement and public awareness. Financial and technical prerequisites for successful CWIS implementation encompassed a need for substantial budget allocations, appropriate technology selection, and comprehensive training programs. The potential benefits of CWIS were highlighted as improvements in public health, environmental sustainability, quality of life, economic development, and social equity. Challenges identified included population density, urban growth, financial constraints, and environmental factors like floods and climate change. The role of CWIS in aligning with the Sustainable Development Goals (SDGs) was emphasized, emphasizing its aim to provide safe sanitation facilities for all residents, including those in informal settlements. The interview also touched upon successful CWIS examples in cities like Khulna, Kushtia, and the Lives and Livelihoods Funds (LLF) 10 Town Project, as well as various research initiatives and the need for future endeavors. Discussions extended to the role of the private sector in WASH research, challenges in manpower for CWIS, issues in the current solid waste management system, sewage management initiatives in select Pourashava authorities, and the necessity for changes in Pourashava budget management to adequately support WASH activities. Overall, the

interview provided a comprehensive overview of the intricacies, challenges, and potential solutions related to CWIS and WASH activities in Bangladesh.

6) CEO of the CWIS-FSM Support Cell, DPHE, Dhaka

In a comprehensive and enlightening discussion with the CEO of the CWIS-FSM Support Cell, an array of crucial topics surrounding Sanitation Laws and Policies, specifically Citywide Inclusive Sanitation (CWIS), were thoroughly explored. The CEO brought attention to a notable lack of awareness among Pourashava officials regarding key legislation, including the Pourashava Law of 2009, the legal framework for sewage management in 2017, and the national strategic plan for implementation in 2020. However, it was underscored that progress has been made through CWIS capacity checkers, with more than 100 Pourashava authorities conducting online orientations during the COVID period (2021-2022) through a joint initiative involving the CWIS-FSM Support Cell, ITN-BUET, and the Pourashava Association of Bangladesh (MAB).

The CEO expressed confidence in the sufficiency of existing laws and regulations related to sanitation in Bangladesh. However, there was a strong emphasis on the necessity of decentralized implementation at the city level, especially across the 329 Pourashava authorities, to effectively monitor city-wide integrated sanitation programs.

A detailed exploration of the roles and responsibilities of various stakeholders in promoting CWIS highlighted the importance of adhering to the National Action Plan. The CWIS-FSM Support Cell's coordinating role in ecosystem monitoring was underscored, emphasizing the active participation of all stakeholders.

The financial and technical requirements for the implementation of Citywide Inclusive Sanitation (CWIS) were thoroughly examined. The CEO stressed the need for resource mobilization and technological innovation at the national level, including influencing the interest of Development Partners (DFIs), prioritizing integrated waste management, and developing technical implementable models, all of which have been prepared under the initiative of the CWIS-FSM Support Cell.

The potential benefits of implementing the National Action Plan 2020 for promoting city-wide inclusive sanitation services were elucidated, including ensuring sanitation facilities for all demographics, providing services across the entire sanitation value chain, and incorporating gender equality and equity principles.

The discussion delved into the challenges of implementing city-wide inclusive sanitation programs in Bangladesh, encompassing issues such as resource mobilization, establishing responsible leadership at the Pourashava level, developing skilled training teams, ensuring adequate land for technical services in sewage management, and adopting long-term plans aligned with the national action plan.

The CEO envisioned city-wide inclusive sanitation as a key player in achieving the Sustainable Development Goals (SDGs) by 2025, citing its potential as an accelerator for SDG implementation. Insights into successful examples of city-wide inclusive sanitation in Bangladesh were presented, covering integrated waste management, sanitation services throughout the value chain, sanitation service models, sanitation workers' cooperatives, CWIS action plan adoption, and the City-wide Integrated Information System (IMIS).

Transitioning to the realm of WASH workers, the discussion tackled the sufficiency of manpower as per Pourashava organograms and suggested exploring partnership agreements with non-governmental organizations to address shortages. Strategies for creating skilled manpower for city-wide inclusive sanitation programs included continuous training, the formation of training resource teams, regular discussions in committee meetings, and awareness campaigns at the community level.

Solid waste management was scrutinized, with the CEO deeming the current system inadequate. Differences between city-wide inclusive sanitation programs and conventional solid waste management were highlighted, emphasizing the inclusion of 3R principles in CWIS and the integration of both human waste and solid waste management.

Turning to sewage management, the discussion revealed that 12% of Pourashava authorities currently have Fecal Sludge Treatment Plants (FSTPs), with an expected increase to 125 cities by 2025. Ongoing government initiatives and projects by various organizations were outlined, emphasizing the need for changes in the current organogram for effective FSM services.

The discussion concluded with insights into the existing budget management for running overall WASH activities. It was deemed impossible to conduct FSM activities under the conventional financial management of Pourashava authorities, necessitating increased budget allocation, national funding, participation in business initiatives, and local resource mobilization through the imposition of sanitation duties. The National Enterprise Plan was referenced for guidance in urban areas.

Overall, the discussion provided a comprehensive understanding of the challenges, opportunities, and strategies involved in implementing city-wide inclusive sanitation programs in Bangladesh, shedding light on the intricate web of laws, regulations, and collaborative efforts driving this critical initiative.

7) Addl. Chief Engineer, Dept. of Public Health Engineering (DPHE), Dhaka

Mr. Tushar Mohon Shadhu Kha, the Additional Chief Engineer at the Department of Public Health and Engineering (DPHE), highlighted several key points in the discussion on Sanitation Laws and Policies and Citywide Inclusive Sanitation (CWIS). DPH officials exhibit limited awareness of the Local Government (Pourashava) Act, 2009. While existing sanitation laws in Bangladesh are deemed sufficient in some instances, there's a recognized need for modification and extension. DPHE primarily provides technical support for CWIS, with ongoing programs in 112 Pourashava authorities and a goal to implement the initiative nationwide by 2023. Challenges include garnering interest and active participation from stakeholders. The importance of inclusive sanitation in achieving Sustainable Development Goals (SDGs) is acknowledged, with successful examples in cities like Chapai Nawabgani, Shibchar, and Shibgani. DPHE recognizes the necessity of manpower enhancement for CWIS activities, with plans to revise the organogram and hire additional staff. Mr. Kha emphasizes the importance of creating skilled manpower through proper training to effectively implement safe sanitation practices through the CWIS Approach.

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