

**THE WORLD BANK**

**ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT (ESSA)**

FOR THE

TAMIL NADU WOMEN EMPLOYMENT AND SAFETY PROGRAM

**Draft: June 2024**

## Table of Contents

List of Acronyms .....	3
1. Executive Summary .....	4
2. Background and Program Description .....	22
2.1 National and State-Level Context .....	22
2.2 Sectoral (or multi-sectoral), State and Institutional Context .....	23
3. Program Description .....	26
4. Methodology for Environmental and Social Systems Assessment (ESSA).....	34
4.1 Introduction to ESSA and Scope .....	34
4.2 Methodology .....	35
4.3 ESSA report preparation process .....	36
5. Legal and Regulatory Framework applicable to the program.....	38
6. Environmental and Social Risks, Screening, potential Benefits and Opportunities .....	40
6.1 Risk screening and Assessment .....	40
6.2 Environmental and Social Benefits and Opportunities .....	41
6.3 Environmental and Social Risk and Benefit Analysis of Proposed Investments .....	42
7. Institutional Assessment.....	46
7.1 Institutional Setup.....	46
7.2 Schemes Supported under the Project .....	52
8. Procedures and Practices for Environmental and Social Risk Management.....	54
8.1 Procedures and Practices for Environmental Risk Management .....	54
8.2 Procedures and Practices for Social Risk Management .....	55
9. Assessment of Borrower's Environmental and Social Management Systems against Core Principles .....	59
10. Recommendations and Action Plans .....	66
10.1 Exclusion of High-Risk Activities.....	66
10.2 Key Highlights of Gaps and Recommendations .....	66
10.3 Recommended E&S Actions in the Program Action Plan .....	68
10.4 Implementation Support Plan .....	69
11. Consultations and Disclosure .....	70
11.1 Stakeholder mapping .....	70
11.2 Stakeholder Consultations.....	70
Annexures .....	78

Annexure A: Secondary Literature Reviewed .....	78
Annexure B: Legal and Regulatory Framework - Environment and Social .....	79
Annexure C: ESSA Disclosure Workshop and Consultation .....	89
Annexure D: Photographs from Consultations and Site Visits .....	90

## List of Acronyms

BPL	Below Poverty Line
CBO	Community Based Organization
CERC	Contingency Emergency Response Component
CPF	Country Partnership Strategy
CRI	Corporate Result Indicator
CSW	Commissionerate of Social Welfare
DLI	Disbursement Linked Indicators
DLR	Disbursement Linked Results
DMSME	Department of Micro, Small and Medium Enterprises
DSWWE	Department of Social Welfare and Women Empowerment
ECoP	Environment Codes of Practice
EHS	Environment, Health and Safety
ESSA	Environment and Social Systems Assessment
FGD	Focus Group Discussions
FLFP	Female Labor Force Participation
GoI	Government of India
GoTN	Government of Tamil Nadu
GP	Gram Panchayats
GRM	Grievance Redressal Mechanism
GRS	Grievance Redressal Service
IPF	Investment Project Financing
IVA	Independent Verification Agent
KII	Key Informant Interviews
MSMEs	Micro, Small, and Medium Enterprises
NEEDS	New Entrepreneur Enterprise Development
OHS	Occupational Health and Safety
PDO	Program Development Objective
PforR	Program for Results
PMU	Program Management Unit
PwD	Persons With Disabilities
PSC	Program Steering Committee
RA	Result Area
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SC	Scheduled Castes
SPID	Special Program Implementation Department
STT	Short Term Training
ST	Scheduled Tribes
TANSEED	Tamil Nadu Startup Seed Fund
TANSIM	Tamil Nadu Start-up and Innovation Mission
TNSDC	Tamil Nadu Skill Development Corporation

UYEGP	Unemployed Youth Employment Generation Program
WB	World Bank
W&CD	Women and Child Development
WeSafe	Women Employment and Safety
WQEP	Women Quality Employment Plan

# 1. Executive Summary

## Program Context

1. Tamil Nadu's growth story<sup>1</sup> is shaped by three forces – urbanization, economic transformation, and ageing. The state has had rapid urbanization over the last four decades with its urban population increasing from 19 million (34 percent of total population) in 1991 to 40.3 million (53 percent) in 2021<sup>2</sup>. The state's economy has also moved away from agriculture; services contribute about 50 percent of Tamil Nadu's GSDP, followed by industries/manufacturing (about 36 percent), and the remainder from agriculture<sup>3</sup>. Tamil Nadu is ageing faster than India: it is projected that the median age in the state will be 35 years by 2021 and 37 years in 2026. Tamil Nadu's female labor force participation is higher than average, but women continue to be employed in poor-quality jobs, mostly in low paying and informal jobs and enterprises<sup>4</sup>. However, the gender gap in LFP is higher in urban areas (50.5 pp) than in rural areas (31.1 pp), which is worrying against the backdrop of a rapidly urbanizing economy. While 40.4 percent of the women workers in Tamil Nadu are employed in manufacturing and services, the wage gap remains substantial<sup>5</sup>. Women own 26 percent of enterprises, which is the highest in India. Most enterprises are categorized as micro-enterprises. However, a significant share of women who are self-employed (13.6 percent in urban areas and 21 percent in rural areas) are helpers in household enterprises.
2. Structural barriers and siloed economic planning restrict women's access to employment in non-farm sectors. Large number of women are migrating to urban centres for better job opportunities. Over 15% of the employed women are heads of households and over 10% have at least one child. This suggests latent demand for housing and care options for women to access gainful employment opportunities. As per NFHS-5, over 38.1% women in Tamil Nadu experience spousal violence. Micro studies also show that regular harassment, unsafe public spaces and public transport affect women's overall mobility<sup>6</sup>. As per a baseline assessment to study barriers to employment and entrepreneurship conducted in 2023 by the GoTN and the World Bank, there is high willingness to work among women with some decline due to marriage and childbearing. There is a strong preference for permanent, government jobs, service sector employment, food processing, health and wellness sectors, and entrepreneurship. Safety, household duties and lack of family support are the significant constraints to employment. Older women lack employable skills while young women require support with job applications, interviews, and digital skills.

## Government Program

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<sup>1</sup> Tamil Nadu is India's growth engine accounting for 9.7 percent of India's GDP. Eighty percent of the state's population is literate, compared with 73 percent of the India average. Only 11.3 percent of the state's households are classified as below poverty line (BPL) compared with the India average of 22 percent, Census, 2011; GoI

<sup>2</sup> Policy Note 2022-2023, Municipal Administration and Water Supply Department, Tamil Nadu; b) Population Projection for India and States 2011-2036, National Commission on Population, Ministry of Health and Family Welfare, 2019.

<sup>3</sup> MoSPI, GoI; 2021-23 estimates

<sup>4</sup> The FLFP rate was 44.4 percent in 2021-22 in Tamil Nadu while the male FLP was almost double, at 84.1 percent as per the Periodic Labor Force Survey, MoSPI, GoI; 2021-22

<sup>5</sup> (INR 78.4 for every INR 100 a male worker earned) and worse than the Indian average of INR 87.06. The wage gap represents occupational segregation as a major proportion of women workers in non-farm sector are engaged in entry level jobs

<sup>6</sup> Chennai City Partnership Program, World Bank 2021

3. The GoTN has a multi-sector program focusing on women's economic empowerment through skill building, enterprise support, infrastructure development, and service delivery interventions. Complementing the State's economic vision, the approved Tamil Nadu Women's Policy (January 2024) puts forward a comprehensive plan for women's empowerment. It aims to "*provide women with improved access to health, education, and employment, to create conducive conditions that allow gender norms to be restructured and behavior-linked changes to occur, to eliminate discrimination, abuse, and violence against women, and to empower women to break gender stereotypes, encourage them to take up more leadership and decision-making roles and excel in all fields.*" To this end, the GoTN intends to expand targeted investments in gender-sensitive education systems, health and nutrition services, business development support to women enterprises, digital literacy, financial inclusion, and skills.
4. Among the GoTN's multi-sector programs which are relevant for women employment initiatives are (i) HEAS (*Pudhumai Penn*); (ii) scheme supplying sewing machine for women (*Sathyavanimuthu Ammaiyan Ninaivu*); (iii) working women hostels; (iv) programs to mitigate sexual harassment of women; (v) New Entrepreneur cum Enterprise Development Scheme (NEEDS); (vi) the Unemployed Youth Employment Generation Program (UYEGP); (vii) Tamil Nadu Startup Seed Fund (TANSEED); (viii) Entrepreneurship Development Program for Women; (ix) Short-term training (STT) and Recognition of Prior Learning (RPL); and (x) *Naan Mudhavalan scheme*. The 'programs' comprise of State led as well as central schemes and are implemented through multiple state government departments. These include Department of Social Welfare and Women's Empowerment (DSWWE), TN Women's Development Corporation (WDC), Department of Industries and Commerce, Tamil Nadu Working Women Hostels Corporation Limited (TNWHCL), Special Program Implementation Department (SPID), Department of Micro, Medium and Small Enterprises (DMSME), Tamil Nadu Startup and Innovation Mission (TANSIM), and TNSDC.
5. The operation will support GoTN to promote and implement integrated interventions to enhance employment opportunities and access to quality jobs for women in non-farm including emerging sectors. The major constraints that hamper FLFP in Tamil Nadu include but are not limited to (i) barriers to employability such as gaps in skill development and entrepreneurship interventions; (ii) inadequate delivery of enabling services to mitigate barriers for women to access quality jobs; and (iii) limitations in institutional capacity to effectively coordinate and implement initiatives that promote better employment opportunities for women. The operation will support the GoTN to implement interventions that will enhance better labor market outcome for women, improve outreach, access and utilization of enabling services, and strengthen planning and delivery processes and partnerships to drive women's employment.

#### **The World Bank (WB) Program**

6. The proposed Tamil Nadu Women Employment and Safety (TNWeSafe) PforR Program ("P") is a subset of the government program (p). The PforR Program will support the existing government programs and will be aligned with the GoTN priorities to enhance FLFP through improved labor market performance and access to quality jobs for women. The government program has an estimated budget of US\$832.85 million over the period 2024-2029. The PforR Program with an estimated value of US\$621.01 million will support integrated interventions responding to evolving needs and aspirations of women, tapping potential of emerging sectors, supporting innovative solutions in enabling services – care, housing, and safety and, strengthening planning across

government levels and sectors. The Program will also support institutional strengthening and system development interventions to facilitate effective delivery of services and create a state and district level platform for coordination of efforts.

7. The proposed Program will support government efforts to address low FLFP and improve women's access to quality jobs in non-farm sectors including emerging sectors. Traditional government programming on women's employment has adopted a sector-specific delivery approach; either through skill development, rural livelihoods, entrepreneurship promotion, or school-to-work transition related interventions. The operation proposes an alternate, integrated programming approach to address bottlenecks that impede women's access to quality jobs by: (i) strengthening planning capacities across levels of government via the state-led platform on women's employment and district-led WQEPPs; (ii) promoting targeted skilling and entrepreneurship support linked to non-farm sectors including related emerging sectors; and (iii) improving delivery of enabling services in (a) women's safety including measures to reduce GBV such as awareness campaigns, safe mobility, and enforcement of existing laws, (b) facilitate access to affordable housing, and (c) access to care services. The Program direct beneficiaries include adolescent girls and working age-women in Tamil Nadu. Some other target groups include members of DSWWE's Industrial Cooperative Societies, those employed in non-farm sectors, women in higher education, women on a career break due to post-partum and personal reasons, vulnerable women such as victims of domestic violence, transgender individuals, sex workers, those in conflict with the law, single mothers, and destitute mothers.
8. The Program will be rolled out statewide. However, priority will be given to areas having more challenges and more opportunities, such as urban and semi urban areas including areas around expanding industrial clusters. Within the non-farm sector, the Program will prioritize sub-sectors that have a demonstrated high growth trajectory including those with minimum environmental and social impacts, such as garments, non-leather footwear, automobiles, green jobs, and digital sectors<sup>7</sup>. The roll-out and coverage of the Program will also vary depending on the nature and categories of the interventions. E.g. interventions related to access to care and safety services will focus on urban areas and will be expanded gradually across the State. Common intervention areas like skill development, entrepreneurship, partnerships, policy, and platforms will have wider outreach and coverage right from the beginning.
9. The Program is a sub-set of a government program. The elements of the government program that are excluded from the PforR Program include farm-based livelihoods and enterprises, employment in public works, investments in Gram Panchayat Development Plans, investments that are on the exclusion list as determined by the Environmental and Social Systems Assessment, and investments that do not target women beneficiaries.
10. The Program Development Objective is to improve women's access to quality jobs in non-farm sectors.<sup>8</sup> The achievement of the PDO will depend upon the results on the following indicators:
  - i. People benefiting from greater gender equality (disaggregated by gender and youth) (percentage) (New Corporate Scorecard)

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<sup>7</sup> GoTN under the "Guidance Tamil Nadu" initiative (Nodal Agency for Investment Promotion) identifies these as "sunrise sectors".

<sup>8</sup> The operation will use the OECD framework to define quality jobs which includes three parameters: (i) earning quality; (ii) labor market security and (iii) quality of the working environment. <https://www.oecd.org/employment/job-quality.htm>

- ii. Beneficiary women who are wage employed or self-employed in non-farm sectors (percentage of all beneficiary women) (disaggregated by sectors – emerging sectors, other sectors; age - 18-29, 30-59 years)
  - iii. Beneficiary women who are wage employed or self-employed in non-farm sectors and who self-report increased wage income or increased sales volume/gross revenue, respectively (percentage of all beneficiary women who are wage employed or self-employed)
  - iv. Beneficiary women utilizing enabling services (percentage of all beneficiary women)
  - v. Districts that have developed and implemented ‘Women’s Quality Employment Plans’ (WQEPs). (number)
11. Program Result Areas (RA): The Program will support three complementary RAs which are aligned with the PDO and other program outcomes. These are (i) EMPLOY: Improved labor market performance for women in non-farm sectors including emerging sectors; (ii) ENABLE: Enhanced delivery of enabling services to promote women’s employment; and (iii) EMPOWER: Strengthened state capacities, technical partnerships, and institutional structures for women’s employment. A detailed description of the Program RAs are as follows:
- i. RA1 EMPLOY: *Improved labor market performance for women in emerging sectors* - RA 1 is focused on improving the access, relevance and quality of skills training programs, career support services, and incubation and acceleration services for women in Tamil Nadu. This will cover:
    - a) *Skills development support:* On skills training, the operation will deliver training in technical, social, emotional, digital, and financial literacy skills to women above 14 years of age to help them become job ready, aligned with existing government program initiatives. This will be accompanied by a package of career support services such as career counselling, internship opportunities, job-search facilities, and placement support. The courses will be developed or upgraded, as the need may be, in these areas.
    - b) *Entrepreneurship support:* This project will have a special focus on delivering quality services to support women-led businesses and prospective entrepreneurs in non-farm including related emerging sectors. This will include incubation programs for early-stage women-led businesses through incubation facilities and acceleration support services to strengthen access to business, legal, digital, and other support services. Support will also be provided on financing for women entrepreneurs and women-led startups across sectors. This will include facilitating access to innovative financing options, enabling connections with financial institutions, and mobilizing funds from private sector. The program will also aim to provide customized entrepreneurship support to different categories of women, with particular attention to poor and vulnerable women.
  - ii. RA 2 ENABLE: *Enhanced delivery of enabling services to promote women’s employment* - Under RA2, the Operation will support setting up a framework to improve coordinated

outreach, quality, and impact of enabling services and development of system for end-to-end care support system to expand services across the state. The services include safety/violence prevention in public places and workplaces, safe transport, affordable housing options, and care services. The operation will incentivize integrated, medium-term planning and convergence of investments through WQEPs at district level in select districts, which will develop and implement zone-level plans to deliver childcare and elderly care services and facilities. WQEPs will prioritize investments in affordable housing, including cash vouchers, strengthening access to hostel facilities and temporary housing for migrant and other women workers in and around urban areas. Specialized mobility options for women will be supported through collaborations with private and public service providers. The operation will also support the development and implementation of a comprehensive communication plan. This would include a helpline system to facilitate access to information, development of customized IEC materials and an awareness campaign about the importance of supporting women in gainful employment opportunities and address the socio-cultural norms including GBV.

- iii. *RA 3 EMPOWER: Strengthened state capacities, technical partnerships, and institutional structures for women's employment* - Under RA3, the state will develop a common results framework and workplan to support the roll-out of the state's Women Policy and efforts to increase FLFP. This would include the setting-up of a state-led platform for women's employment anchored within and managed by the SPID to coordinate multi-sectoral implementation efforts and drive evidence-based decision-making. The platform will bring together priority departments, public institutions, private sector, academia and research institutions, CSOs, development partners, women entrepreneurs, and industry associations. The operation will also create district level platforms to coordinate and promote women's employment and entrepreneurship.

The Operation will also support the development, adoption and implementation of relevant state level policies and a regulatory framework. It will also develop targeted partnerships and outreach arrangements to engage private/public sector and government departments to facilitate training, internships, apprenticeships, and job placements. It will cover the development of integrated and digitized delivery and monitoring systems for multi-sectoral economic inclusion and job creation interventions. It will also leverage technologies for capacity building, knowledge sharing, and training of officials. This RA will incentivize partnerships with industry associations, institutes of eminence, and private organizations for initiatives like digital inclusion, life skills and incubation support, and innovations in delivering services through WQEPs and facilitating partnership and private capital mobilization.

### **Program Implementation**

12. The TNWeSafe Operation will be anchored in the Special Program Implementation Department (SPID), to ensure coordination amongst priority departments for planning, implementation and monitoring of activities. The priority departments for program implementation include Social Welfare and Women Empowerment Department (SWWED), Micro, Small and Medium Enterprises Department (MSMED) and Tamil Nadu Skills Development Corporation (TN-SDC). At the district level, SWWED, MSME and TNSDC, through their district level offices, will be responsible for the implementation of the operation. A state level Program Steering Committee

(PSC), chaired by the Development Commissioner and including the Secretaries of Finance Department, SPID, SWWED, MSMED, MD of TNSDC and heads of other relevant institutions will be established. The PSC will provide oversight for state level interventions and will ensure inter-departmental coordination. It will meet annually to review progress, approve annual action plan and budget and ensure inter-departmental coordination.

13. A Program Management Unit (PMU) will be established under the SPID at the State level. It will be headed by the Project Director (PD) reporting to the Development Commissioner through Secretary, SPID. PMU will be responsible for the coordination and management of the Operation in collaboration with the implementing institutions. It will provide general oversight, technical support, supervision, M&E, and overall planning. At the district level the project team will include officers on deputation from SWWED, MSME and TNSDC. The district team will report to the District Collector through Project Director, Mathi, Tamil Nadu Corporation for Development of Women<sup>9</sup>. The PMU will also be responsible for implementation of the IPF component under this operation.

### Risk Assessment

#### ***Environmental Risks, Benefits and Opportunities***

14. The most prevalent environmental issues expected during/due to program interventions will be related to; (i) Temporary construction (refurbishment activities) related impacts - dust, noise, air, waste and water pollution; (ii) Operational, Health and Safety for workers involved in minor civil/ upgradation works (in working women hostels, incubation center, care facilities , livelihood promotion centers, etc.); (iii) disposal of increased waste (e-waste, textile waste, C&D waste, other hazardous waste) due to increase in operations in emerging and non-farm sectors and procurement of IT equipment under the Operation; (iv) occupational health and safety of women to be employed in emerging and non-farm sectors for jobs/livelihoods; (v) increased and unsustainable resource consumption (energy, water, improper waste disposal) in facilities like child and elderly care centers (care economy).
15. **Systems Assessment and key gaps:** The ESSA found that the overall policy and regulatory framework and the available technical guideline of the borrower is comprehensive and contributes to E&S sustainability with respect to the Program. However, there are instances of inadequate safeguards, inconsistent application and monitoring of existing provisions due to lack of capacities of Implementing agencies which may result in adverse impacts during site-level interventions. The Program implementing departments demonstrate a good understanding of sustainability concerns and processes but have limited in-house (human and technical) capacity to plan, assess and manage environmental risks from proposed investments.
16. **The net environmental impact of the program will be positive.** There are many potential environmental benefits and opportunities that the Program will introduce directly and indirectly, including:

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<sup>9</sup> Following a gradual roll out plan of the program, District Project Management Unit (DPMU) headed by the District Project Manager will be established under the District Collector. The District Project Manager will be supported by Young Professional and Office Executive. The DPMU will coordinate with the district level officials i.e., District Social Welfare Officer(DSWO), General Manager- District Industries Centre(MSME) and Programme Manager (TNSDC) to support the project activities. The District Project Manager will report to the Project Director.

- a. Promotion of skills for green jobs in the labor market is likely to influence investments in green activities and thereby help accelerate green economic transformation.
- b. Adoption of eco-friendly approaches in emerging sectors, enhanced environmental consciousness and green skills in women to be employed in emerging and non-farm sectors (garment manufacturing, textile industry, automobiles, digital sectors, Non-leather footwear) and sustainability managed elderly and child care facilities, will bring climate change benefits and contribute towards the state's plan on climate change mitigation
- c. Knowledge and awareness generation through skills development & training, capacity building (through inclusion of dedicated Environmental modules and mandatory trainings) and outreach activities is likely to lead to greater environmental consciousness, directly and indirectly, through exposure to multiple channels of information.
- d. Enhanced institutional capacities of various training/coordinating institutions leading to the optimum utilization of existing infrastructure and resources available will minimize environmental impacts resulting from inadequately planned infrastructure.
- e. Reduced reliance on agriculture-based livelihoods will help women who are seeking gainful employment, better manage climate related risks and economic vulnerabilities.

***Social Risks, Benefits and Opportunities***

- 17. **Risks:** The Program is not expected to have any significant adverse social impacts taking into account contextual risks, institutional capacity and other reputational risks. The major social risks identified would relate to: i) risk of exclusion for disadvantaged and vulnerable groups; ii) inter and intra-district variations in management of E&S risks; iii) fragmented grievance redressal mechanisms, including inadequate systems to address grievances related to Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH)/GBV (Gender-based violence); iv) SEA/SH risks for female trainees and beneficiaries due to potential interface with various stakeholders, workers and staff involved in program activities; and v) other social risks arising out of deficiencies in planning, implementation and monitoring of stakeholder and community engagement. The social impacts arising from any civil works such as those involved in upgrading of women's hostels would be minor and reversible. Overall, the findings from the screening indicated that the social risk is 'moderate.' The screening also ensured that the Program does not include activities ineligible for financing using the PforR instrument and an Exclusion List has been provided in Chapter 10.
- 18. **Benefits and Opportunities:** The potential social benefits and opportunities of the Program include the following:
  - a. Improved access to economic growth opportunities for women belonging to vulnerable and disadvantaged groups (such as Scheduled Tribes (STs), Scheduled Castes (SCs), Persons with Disabilities (PwDs), transgender individuals among others);
  - b. Improved awareness and participation from women and other stakeholders leading to enhanced planning capacity at the district-level;
  - c. Strengthened functionality and access of the state's grievance redressal mechanism (GRM);
  - d. Improved capacity of state systems to manage SEA/SH risks;
  - e. Improved labour management at construction sites including improved management of risks related to labour influx;

S. No	RA	Activity	Environmental Risk Rating and Justification for Rating	Social Risk Rating and Justification for Rating
1.	<b>RA 1: EMPLOY: Improved labor market performance for women in emerging sectors</b>	<p><b>Skills development support</b></p> <ul style="list-style-type: none"> <li>Technical, social, emotional, digital, and financial literacy skills to women</li> <li>Career support services such as career counselling, internship opportunities, job-search facilities, and placement support</li> <li>Training in non-farm and emerging sectors</li> <li>Skills training programs including life skills such as communication, negotiation, logical thinking, language skills, personal safety, and mental health</li> </ul> <p><b>Entrepreneurship support</b></p> <ul style="list-style-type: none"> <li>Incubation programs for early-stage women-led businesses through state/ regional/ district level incubation facilities</li> <li>Acceleration support services to existing help women-led businesses scale up</li> <li>Improving access to innovative financing options (co-financing, competitive business proposals, staggered grants, etc.), enable connections with financial institutions, and mobilize fund from private sector</li> </ul>	<p>Risk Rating: low</p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Inclusion of green practices in operations of emerging and non farm sector employment will bring environment conservation benefits.</li> <li>Increased opportunity for income generation in non-farm based sectors will directly and indirectly reduce dependence on natural resources.</li> <li>Environmental education: Promoting environmental education in childcare facilities can help instill sustainable practices and awareness in children from a young age.</li> </ul> <p><b>Risks</b></p> <ul style="list-style-type: none"> <li>Construction related pollution and OHS: Potentially adverse environmental impacts of minor civil works construction that could cause localized, site-level pollution and OHS issues.</li> <li>EHS: Inconsistent application of EHS provisions in civil works contracts or by relevant govt departments may pose worker safety related risks</li> <li>Waste Management: Unsustainable management of waste (especially e-waste) generated during procurement of digital</li> </ul>	<p>Risk Rating: Moderate</p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Improved access to skill development activities and entrepreneurship support for women from marginalized groups.<sup>10</sup></li> <li>Increased opportunities in non-farm and emerging sectors for economic inclusion of dropouts and unemployed youth and women.</li> <li>Development of pathways to overcome structural barriers to access entrepreneurship support for women-led businesses.</li> </ul> <p><b>Risks</b></p> <ul style="list-style-type: none"> <li>Possible exclusion of vulnerable groups due to lack of information or awareness.</li> <li>SEA/SH risks for female beneficiaries (including trainees and entrepreneurs) during program activities due to interface with multiple stakeholders, inadequate safety arrangements in training centres, incubation centres, hostels etc.</li> <li>SEA/SH risks during civil works</li> </ul>

<sup>10</sup> Some groups that the Government has already identified for targeting of training programs and career support services include members of DSWVE's Industrial Cooperative Societies, those employed in non-farm sectors, women in higher education, women on a career break due to post-partum and personal reasons, vulnerable women such as victims of domestic violence, transgender individuals, sex workers, those in conflict with the law, single mothers, and destitute mothers (PAD)

			equipment under the program	
2.	<b>RA 2: ENABLE: Enhanced delivery of enabling services to promote women's employment:</b>	<ul style="list-style-type: none"> <li>Development and approval of Women's Quality Employment Plans (WQEPPs) at the district level in selected districts.</li> <li>Support the development and implementation of a comprehensive communication plan.</li> <li>Support a helpline system for women on information related to enabling services for employment.</li> <li>Development of customized IEC materials</li> <li>Communication campaign at all levels</li> </ul>	<p><b>Risk rating – Low</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Strengthened planning, communications, and outreach to support and enhance women employment opportunities in non-farm and emerging sectors with dedicated modules/sessions on environmentally positive operations, will increase overall environmental awareness and consciousness in newly employed women and will gradually reduce jobs in/provide alternative livelihoods to natural resource dependent communities/climate vulnerable sectors.</li> </ul> <p><b>Risks</b></p> <p>NA</p>	<p><b>Risk Rating: Moderate</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Improved awareness and participation leading to enhanced planning capacity at the district-level.</li> <li>Improved capacity and support for female entrepreneurs.</li> <li>Improved communication and information for women beneficiaries</li> </ul> <p><b>Risks</b></p> <ul style="list-style-type: none"> <li>Lack of adequate consultations with vulnerable and disadvantaged groups to inform the development of WQEPPs</li> <li>Communication plan and IEC materials not informed by consultations from relevant stakeholders and inadequate in addressing their requirements</li> </ul>
3.	<b>RA 3: EMPOWER: Strengthened state capacities, technical partnerships, and institutional structures for women's employment</b>	<ul style="list-style-type: none"> <li>State-led platform for women's employment anchored within SPID</li> <li>District level platforms to coordinate and promote women employment and entrepreneurship</li> <li>Targeted partnerships and outreach arrangements for training, internships, apprenticeships, and job placements.</li> <li>Capacity building, knowledge sharing, and training of officials on women's economic empowerment and labor market integration.</li> </ul>	<p><b>Risk rating – Low</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Strengthened policy and institutional framework and systems to support and enhance women employment opportunities in non-farm and emerging sectors will increase overall environmental awareness and consciousness</li> <li>The interventions are expected to gradually reduce jobs in climate vulnerable sectors, and will provide alternative livelihoods to</li> </ul>	<p><b>Risk rating - Low</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Improved capacity of state institutions to provide improved services supporting women's employment</li> <li>Improved capacity of state institutions to manage social risks in their internal functioning, designing and implementing interventions</li> </ul>

		<ul style="list-style-type: none"> <li>Collaborations with established technical institutes.</li> </ul> <p>natural resource dependent communities.</p> <ul style="list-style-type: none"> <li>Institutional, knowledge, outreach and policy support for green jobs and sustainable practices in other emerging sectors will facilitate transition to green economy for Tamil Nadu</li> </ul>	<ul style="list-style-type: none"> <li>Collaborative approach enhancing stakeholder participation</li> </ul> <p><b>Risks</b></p> <ul style="list-style-type: none"> <li>Lack of focus on developing capacity on social risk management</li> <li>SEA/SH risks for women officials during the course of trainings and other capacity building initiatives</li> </ul>
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### **Institutional Assessment**

19. *Special Program Implementation Department (SPID)*: The SPID is the nodal coordinating agency between line departments across other programs like *Naan Mudhalvan*. The PMU will be housed under SPID and will be managed by the Project Director (PD) reporting to the Secretary, SPID. PMU will be responsible for the coordination and management, general oversight, technical support, supervision, M&E, resource management, and allocation of the program in collaboration with the implementing agencies. The PMU currently does not have in-house capacity for E&S risk management and will require technical assistance from the Program to ensure necessary due diligence and efficient management of E&S impacts for program investments.
20. *Tamil Nadu Skills Development Corporation (TNSDC)*: TNSDC is a Section 8 Company under SPID since 2013. It is also the State Nodal Agency for Skill Development by the Government.<sup>11</sup> TNSDC works through Training Partners, certified by the Sector Skill Council (SSC), the national certification awarding body affiliated to the National Skill Development Corporation (NSDC). TNSDC is eligible to certify training partners and design curriculum. They also monitor the performance of institutions. Training centres have biometric attendance systems and CCTV monitoring. There are guidelines on assessing performance of training partners through data on enrollment and attendance, successful completion of training and placement. There is a comprehensive monitoring system involving periodic surprise inspections. TNSDC also has training programs targeted at women beneficiaries and other disadvantaged groups. TNSDC has an ICC to comply with the requirements of the POSH Act. TNSDC does not have any dedicated staff for environmental or social risk management.
21. The Naan Mudhalavan scheme under TNSDC provides free employment linked skill development trainings to students of government or government-aided colleges (other than medical colleges). Trainings are integrated into the undergraduate course and account for credits. These nationally certified trainings are provided through empaneled training partners at centres across the state in over 20 different sectors like healthcare, media and entertainment, green jobs, retail, beauty, construction, electronics and hardware, food processing, health care, IT ITES, leather, logistics etc. Consultations are conducted every six months with industry representatives to ascertain the

<sup>11</sup> <https://www.tnskill.tn.gov.in/>

industry demand and ensure that the courses are responsive to market needs. TNSDC is also the nodal agency for imparting industry oriented and placement linked skill related training to unemployed youth through collaborations with government agencies, skill training institutions and industry partners. Training partners are registered and certified by Sector Skill Council (SSC).

22. *Environment Management:* While there are limited dedicated and active interventions on Environmental Management capacity development in TNSDC, it is important to note that the organization plays a crucial role in promoting sustainable development and green jobs in the state. TNSDC collaborates with various training institutions and organizations for capacity-building activities with an aim to equip the staff with the necessary skills and knowledge to address environmental concerns in their projects and programs.
23. The green job promotion initiatives under TNSDC are working actively in select sectors and this initiative recognizes the need for mainstreaming environmental sustainability in emerging-sector jobs. The organization has already started incorporating “greening” approaches in many of their ongoing training programs for employable youth. Capacity building courses in solar technology<sup>12</sup> are being taken up especially related to Solar PV Designs, Solar PV Installation (electrical) and Solar PV Installer (Surya Mitra). Chennai and Ranipet Districts has green skill training providers in renewable energy sector in Tamil Nadu specifically on solar technology. In Naan Mudhalvan Scheme - the Upskilling Platform for industry relevant skill enhancement initiatives for the Youth of Tamil Nadu, there are courses on Electric Vehicle operations. By equipping individuals with skills related to green technologies, renewable energy, TNSDC has initiated contributions to the promotion of green jobs in Tamil Nadu. The above examples demonstrate TNSDC's efforts to incorporate environmental considerations into its activities.
24. *Social Welfare and Women Empowerment Department - SWWED (Commissionerate of Social Welfare):* The SWWED implements schemes for upliftment of women and children. The CSW also manages working women's hostels. The Commissionerate is divided into several sections, each dedicated to specific welfare programs. At the district level, the District Social Welfare Office is responsible for overseeing and coordinating programs and schemes within their respective district. The Department has an ICC to comply with the requirements of the POSH Act. The Department currently does not have in-house capacity or dedicated staff for Environment and Social risk management.
25. The SWWED implements the Pudhumai Penn Scheme under which, financial assistance of INR 1000 per month is provided to girl students who have studied in Government schools from standard 6-12 and are currently pursuing their higher education in institutions in Tamil Nadu. This amount is disbursed directly to their bank account. Institutions appoint a Nodal Officer who is responsible for identifying and registering eligible students on the portal.
26. *Environment Management in TNSDC -* During ESSA preparation consultations were held with college students who are benefitting from Naan Mudhalvan scheme's courses by the TNSDC. These upskilling courses are integrated into their degree programs and includes topics like EV battery management, port logistics, python and data analytics. As part of the program, every six months, consultation is done with industry partners to ascertain the current needs of the market,

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<sup>12</sup> <https://www.cag.org.in/sites/default/files/database/11.pdf>

and hence the courses are usually updated as per the market needs and latest application-based knowledge. As per the interactions with the department and the filled questionnaires, there is limited scope to include environmental considerations in the ongoing schemes and programs. The department does include certain elements of environmental considerations in its various programs and trainings but does not have a formal environment risk management system or protocol in place. Some trainings are also directly/indirectly related to development of green skills for emerging sector jobs.

27. *Micro Small and Medium Enterprises Department (MSMED)*: The MSMED provides support to MSMEs for technology upgradation, modernization, integrated infrastructural facilities, access to modern management practices, entrepreneurship development, and skill upgradation through training. These initiatives indirectly contribute to promoting environmental sustainability by encouraging MSMEs to adopt sustainable practices and technologies. MSMED does not currently have dedicated staff for environmental and social risk management.
28. *Environment Management in MSMED*: Micro Small and Medium Enterprises Department (MSMED) of Tamil Nadu<sup>13</sup> recognizes the importance of environmental sustainability and the Tamil Nadu MSME Policy suitably incorporates environmental considerations<sup>14</sup> into its policy objectives. Additionally, the MSMED acknowledges the significance of environmental compliance and regulatory measures. The Government of Tamil Nadu has introduced Promotion of Energy Audit and Conservation of Energy (PEACE)<sup>15</sup> scheme for promoting Energy efficiency in MSME units. Main objective of the scheme is to identify the major sources of energy in use, identifying the lapses in energy usage, identifying areas to improve energy usage, determining the level of consumption of the energy sources, and recommending measures that will enhance energy savings in the industry. The PEACE scheme aims to promote energy efficiency in MSME units to enable them to reduce costs and improve competitiveness in the global markets. Under this scheme, the Government will reimburse 75% of the cost of conducting energy audit subject to a ceiling of Rs.1.00 lakh per energy audit per unit. As an incentive for implementing the recommendations of the energy audit, 50% of the cost of machinery and equipment replaced, retrofitting and technology acquired for the purpose of improving the energy efficiency subject to a maximum of Rs.10 lakh is reimbursed.
29. The department conducts assessments to evaluate the level of environmental regulatory compliance among MSME units and their track record on compliance. This indicates a focus on ensuring that MSMEs adhere to environmental regulations and promote environmental responsibility through very relevant schemes like PEACE. By promoting technology upgradation, entrepreneurship development, and compliance with environmental regulations, the department contributes to fostering sustainable practices among MSMEs in Tamil Nadu.
30. Additionally, the MSMED department collaborates with various stakeholders, including government officials, industry associations, non-governmental organizations, civil society

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<sup>13</sup> [https://cms.tn.gov.in/sites/default/files/documents/MSME\\_Policy\\_2021\\_0.pdf](https://cms.tn.gov.in/sites/default/files/documents/MSME_Policy_2021_0.pdf)

<sup>14</sup> Objectives related to Environment sustainability in MSME policy include: 1. Promote and facilitate green initiatives and sustainable waste management; 2. Reinforce social equity and inclusion; 3. Build capacity and resilience of MSMEs to tide over business cycles and natural disasters; 4. Create quality consciousness and encourage certification; 5. Strengthen the supporting legal framework.

<sup>15</sup> [https://msmeeonline.tn.gov.in/incentives/html\\_cye\\_peace1.php](https://msmeeonline.tn.gov.in/incentives/html_cye_peace1.php)

organizations, and MSME associations, to assess the level of environmental regulatory compliance and learn new and green technologies for various MSME operations. This indicates a focus on ensuring that MSMEs adhere to environmental regulations and promote environmental responsibility.

31. *Commissionerate of Industries and Commerce* – CII provides support services to entrepreneurs for identification of viable activities and obtaining assistance from financial institutions/banks. They also conduct entrepreneurship and skill training programs and create awareness about government policies through camps, seminars etc. They sanction and disburse incentives and subsidies to MSMEs, as per MSME Policy of GoTN<sup>16</sup>. The key schemes under the Commissionerate of Industries and Commerce include the Unemployed Youth Employment Generation Programme (UYEGP), Annal Ambedkar Business Championship Scheme (AABCS), and New Entrepreneur cum Enterprise Development Scheme (NEEDS)<sup>17</sup>. It currently does not have any dedicated staff for environmental and social risk management.
32. *Environment Management in Commissionerate of Industries and Commerce*: The Commissionerate focusses on promoting sustainable industrial practices, pollution control, and compliance through enforcement of existing environmental regulations. This could involve implementing measures to reduce industrial pollution, encouraging industries to adopt cleaner technologies, and ensuring adherence to environmental standards. Under the department's Scheme for Reimbursement of Charges for Quality Certification, the MSMEs are encouraged to acquire quality standards/certifications<sup>18</sup> for process and product, such as ISO 9000/ISO 14001/ISO 22000/Hazard Analysis and Critical Control Point (HACCP)/ Good Hygienic Practices (GHP) / Good Manufacturing Practices (GMP) Certifications, BIS Certification, Zero Defect and Zero Effect (ZED) Rating or any other international quality certification recognized in India by a competent authority. The government reimburses payments made to Consultancy and certification agencies towards acquiring such Quality Certification subject to a ceiling of Rs.2.00 lakhs for National level certification and Rs.10.00 lakhs for International level Certification. As per the received information, during the financial year 2020-21, a sum of Rs.60.35 lakhs has been disbursed to 92 MSMEs in the State. The Commissionerate also actively works with the PEACE scheme, which aims to promote energy efficiency in MSME units to enable them to reduce costs and improve competitiveness in the global markets. Although the Commissionerate does not have a dedicated team/staff to monitor Environment Management in its services, it does ensure promoting sustainable industrial practices, pollution control, and compliance with relevant environmental regulations and adherence to environmental standards in its establishments/operations.
33. Tamil Nadu Startup and Innovation Mission (TANSIM) / Startup TN - Startup TN supports innovation, promotes investments in R&D, provides infrastructure support, knowledge creation, technological development and skilled manpower, for sectors ranging across agriculture, manufacturing, healthcare, education, logistics, social sector, urban development, environment,

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<sup>16</sup> <https://www.msmtamilnadu.tn.gov.in/about-commissionerate.php>

<sup>17</sup> UYEGP targets economically and socially weaker sections of society, AABCS targets members of the Scheduled Caste and Scheduled Tribe communities, and NEEDS is targeted specifically at the first entrepreneurial projects of first-generation entrepreneurs.

<sup>18</sup> <https://www.msmtamilnadu.tn.gov.in/q-cert.php>

to Fintech and ICT<sup>19</sup>. Startup TN has presence across the state with focus on Tier II & Tier III regions. It has a strong inclusionary focus, with focus on women entrepreneurs.

34. Under TANSEED, eligible women-led startups are provided enhanced assistance. 25% of the total assistance is also earmarked for women-led startups under TANSEED 6.0. Startup TN also provides exclusive and subsidized co-working spaces for women-led startups, targeted training programs, women's mentorship programs, exclusive acceleration program for women-led startups and FemTech startups and focused angel investor circles for women-led startups<sup>20</sup>. As of February 2024, TANSEED has funded 51 women-led startups in its five editions since 2021. They also have a Tamil Nadu Scheduled Caste / Scheduled Tribe Startup Fund and as of February 2024, 24 SC/ST led startups are in their portfolio. Startup TN conducts programs and awareness sessions among startups. They have also formed the ICC under POSH Act. They currently do not have any dedicated staff for management of environmental and social risks.
35. *Environment Management in StartupTN / TANSIM:* Tamil Nadu Startup and Innovation Mission (TANSIM) / Startup TN recognizes the importance of environmental sustainability and promotes initiatives that aim to integrate environmental considerations into the startup ecosystem. TANSIM aims to foster innovation and entrepreneurship in Tamil Nadu, which indirectly contributes to sustainable development. By supporting startups and promoting innovation, TANSIM encourages the development of new technologies and solutions that can address environmental challenges and promote sustainable practices.
36. Tamil Nadu Startup and Innovation Mission (TANSIM) provides support to many start-up ecosystems by supporting Incubators which has helped create a steady stream for new innovative ideas and startups. The ESSA Consultations included interaction with Crescent Innovation and Incubation Council, in the Crescent Institute of Science and Technology at Chennai. The consultations confirmed that the existing incubator centers are currently focusing on a few green sectors like life science startups (bio-energy, bio-pharma, bio-services, bio-industrial), and Clean mobility (drone technology, smart and non-fossil fuel vehicles, EV, EV battery management and autonomous navigation). The incubator center acts as a one-stop-shop for startups that facilitates entrepreneurial and innovative ecosystem for all stakeholders. The incubator also prioritizes ESG concerns and supports implementing good ESG practices among incubate companies. They are responding to market forces and a strong push from the investing community. It was observed during the consultations that there is a lack of clarity reported among the startup community on appropriate ESG guidelines, especially since there is a lot of variation in requirements depending on the product.
37. At the district level the project team, which will include officers on deputation from SWWED, MSME and TNSDC as well as contractual staff, will report to the District Collector. The district team will also work in close coordination with Assistance Project Offices (APO) from the National Urban Livelihood Mission.

## **Key Gaps**

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<sup>19</sup> <https://www.msmtamilnadu.tn.gov.in/tansim.php#chart-line>

<sup>20</sup> GO (Ms) No. 87 dated 26.12.22

## **Procedures and Practices for Social Risk Management**

38. **Grievance Redressal Mechanisms:** Tamil Nadu has a state-wide Integrated and Inclusive Public Grievance CM Helpline Management System (IIPGCMS). People can submit grievances related to government schemes or services and other public issues through a mobile application, helpline (1100), email, web portal, post, twitter and facebook. Grievances are forwarded to concerned departments, each of which have their own Service Level Agreements (SLA) which provides a timeline for the grievance redressal process<sup>21</sup>. As per national guidelines, the state also has a 24x7 women's helpline, which is intended to provide 24 hours immediate and emergency response to women affected by violence through referrals. All implementing agencies have their grievance redressal mechanisms where complaints are registered and recorded through a portal or a phone number. Various schemes and initiatives also have separate portals, service desks, apps, or numbers for registering and addressing grievances, as well as designated nodal officers / teams.
39. The assessment has identified certain gaps: (i) Lack of clear and transparent grievance resolution protocols, process, communication process; (ii) Inconsistent formats for maintaining a record of grievances received; (iii) Poor publicity of available GRMs in offices of implementing agencies, training centres, colleges etc.; (iv) Lack of clear appeals process; (v) Lack of capacity and knowledge on handling of SEA/SH grievances in the existing GRMs; (vi) Lack of provisions for confidential grievances; and (vii) Lack of monitoring and evaluation of grievances received.
40. **Management of Sexual Exploitation and Abuse / Sexual Harassment:** ICCs have been established at the implementing agencies. Most GRMs are also not equipped to handle specifically SEA/SH grievances. The GRM within the DSWWE is equipped to handle complaints related to GBV, SEA/SH. It encompasses a range of measures, including handling of sexual harassment cases, provision of shelter, health, and legal aid for victims, and counselling services. Protection Officers at the district level are appointed to assist victims in filing cases and obtaining remedies in Cases of Domestic Violence.
41. The assessment has identified gaps in ensuring widespread publicity of the ICC and POSH requirements. There is also a need to have trainings and awareness building sessions regarding sexual harassment at the workplace. These measures also have to address the needs of adolescent girls who are particularly vulnerable to the risk of SEA/SH.
42. **Stakeholder Engagement:** The IAs have public interface as part of their projects and they sometimes engage in activities to create awareness and disseminate information about various schemes. The stakeholders in these activities include the general public, especially women, children, senior citizens, transgender individuals, training partners, industry partners, beneficiaries etc. As per the assessment, stakeholder engagement is currently *ad hoc* and irregular. There is no comprehensive plan for engagement with beneficiaries and other stakeholders on a regular planned basis for sharing information, receiving feedback and networking, in general. Regular and responsive stakeholder engagement, which is recorded is important, so that feedback can flow upwards into program design and implementation.

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<sup>21</sup> [https://cmhelpline.tnega.org/portal/en/kb/articles/tamil-nadu-cm-helpline-faqs#1\\_What\\_is\\_the\\_purpose\\_and\\_objectives\\_of\\_Integrated\\_and\\_Inclusive\\_Public\\_Grievance\\_CM\\_Helpline\\_Management\\_System\\_IIPGCMs](https://cmhelpline.tnega.org/portal/en/kb/articles/tamil-nadu-cm-helpline-faqs#1_What_is_the_purpose_and_objectives_of_Integrated_and_Inclusive_Public_Grievance_CM_Helpline_Management_System_IIPGCMs)

43. **Social Inclusion:** The existing schemes include specific provisions for inclusion of vulnerable and disadvantaged groups such as women, destitute widows, SC/ST, differently abled persons, transgender persons etc.
44. **Labour Laws Compliance:** This project is expected to involve minimal civil works, if at all, related to renovation and upgradation of working women's hostels. Any civil works, if required, are likely to be done by a contractor, with the implementing agency executing and supervising works. Supervision would include ensuring contractor's compliance to labour laws to the extent required legally and contractually and by monitoring. There is currently limited provisioning for site-specific E&S management plans and monitoring of OHS for civil works. Due diligence checklists can be used to ensure basic compliance.

### **Stakeholder Consultation**

45. This assessment has been prepared after a comprehensive consultation with a vast spectrum of stakeholders. These included program implementing agencies, training partners, colleges, beneficiaries of the various schemes under the program, business incubators, working women's hostel operators, and grievance redressal officers in the implementing agencies. Field visits were also conducted to interact with beneficiaries in person and observe training centres, incubators, and functioning of the various implementing departments. The key points which emerged in the discussions included:
  - Challenges in accessing program benefits e.g., difficulty accessing funds due to coordination issues with banks for Pudhumai Penn Scheme beneficiaries,
  - Experience of beneficiaries, operators and implementing agencies with grievance redressal mechanisms is mixed
  - Schemes like Pudhumai Penn and Naan Mudhalavan have played a critical role in giving women beneficiaries an opportunity for higher education, professional skilling and enhancing their employability, enabling them to break out of socio-economic constraints.
  - Women entrepreneurs face challenges in accessing loans and funds. Key challenges include documentation and other requirements of banks, inadequate training, lack of adequate information and platforms for networking with the entrepreneurship ecosystem.

### **Recommendations and Inputs to Program Action Plan (PAP)**

46. The Bank's Program was reviewed to ensure that certain high-risk activities would not be eligible for inclusion in the PforR operation. During the implementation, the GoTN will be required to ensure that all such activities remain excluded. These activities are listed in the Exclusion List in Chapter 10 of the ESSA.

### ***Overall Recommendations***

47. **Strengthening Grievance Redressal Mechanism:** There are multiple parallel Grievance Redressal Mechanisms operating simultaneously. However, there are some gaps. There are no consistent service standards on time, reporting back and monitoring of data. Strengthening GRM would be accompanied by inclusive awareness programs and training sessions on GRM for implementing agencies and beneficiaries, particularly women.

48. **Strengthen Stakeholder Engagement:** There are multiple schemes having thousands of beneficiaries operating across the state. However, the potential benefits of these social welfare schemes are weakened due to a lack of focus on stakeholder engagement. Increase in the number and frequency of stakeholder engagement activities, forums for beneficiaries to interact with each other, industry partners and the overall professional ecosystem would enhance the value of operation interventions.
49. **Include environmental and social sustainability content in training modules:** The current trainings provided to entrepreneurs and college students support them to meet the requirements of business and professional life. Incorporating environmental and social sustainability into the training modules would help to mainstream these concepts into the workforce.
50. **Strengthen handling of SEA/SH risks:** Many of the project beneficiaries are women and adolescent girls. These groups are vulnerable to risks of SEA/SH. It is important that all the implementing agencies and training partners have adequate systems in place as mandated by the POSH Act, conducting regular awareness campaigns among staff and beneficiaries, and displaying all requisite information in their premises, particularly those where there is interface with beneficiaries. The grievance handling officers also need to be sensitized on handling SEA/SH grievances. This should be implemented with all implementing agencies at all levels.
51. **Strengthen Environment Management systems and promote green practices in operations of hostels and creche facilities** - Compliance to existing rules and guidance on pollution management and OHS of workers need to be observed during refurbishment activities and minor civil works on site, if any. Quarterly E&S reports (aligned with PMU reports) could include a dedicated section on Pollution management and OHS monitoring in all active refurbishment sites and O&M Activities. The PMU E&S staff and World Bank ESSs are also suggested to work closely with SWWED to promote good environment practices (like waste segregation, recycling, rainwater harvesting, eco programs, awareness campaigns on sustainable operations) in selected hostels and care facilities and mainstream environment management and monitoring protocol/system in the operations of these facilities.
52. **Strengthen Environmental and Social Risk Management Capacity in the PMU:** An Environmental and Social Expert would be required at the PMU as the nodal person for monitoring progress on all environmental and social risk management actions across all implementing agencies.

#### ***Program Action Plan***

53. Deriving from the recommendations above, the following Program Action Plans have been proposed:

Action Description	Responsibility	Due Date	Completion Measurement
Appoint nodal officer for environmental and social risk management in the SPID/PMU and priority nodal agencies	SPID/PMU	31-Oct-2024	E&S focal persons assigned at PMU and at the priority Nodal agencies .

Action Description	Responsibility	Due Date	Completion Measurement
Develop SOP to strengthen Grievance Redressal Management systems across nodal departments and implementing agencies.	SPID/PMU	31-Dec-2024	SPID/PMU prepares SOP for GRM to be implemented by all priority departments. This would cover the GRM process, responsible staff, escalation matrix, feedback loop, recording of grievances reporting, monitoring and evaluation.
Development of guideline and action plan for mainstreaming Social and Environment Inclusions (including Gender aspects) and Citizens Engagements measures (GRM, Communication, Social Accountability) in to program implementation.	SPID/PMU	31-Dec-2024	SPID/PMU shares will share approved guideline and action plan ready for implementation.
Include mandatory training modules on Environment Management and sustainability practices in the short term training programs	SPID/PMU	31-Dec-2024	E&S focal persons assigned at PMU and at the priority Nodal agencies

## 2. Background and Program Description

### 2.1 National and State-Level Context

1. India's growth is forecasted in FY23-24 to be between 6.3-7.3 percent. India has made remarkable progress in reducing extreme poverty over the past two decades. The share of the population living below US\$2.15 per person per day (2017 PPP) is estimated to have halved between 2011 and 2019.<sup>22</sup> However, the pace of poverty reduction has slowed in recent years, with key welfare indicators being slow to improve.<sup>23</sup> Inequality in consumption has remained stable, with a Gini index of around 35 over the past two decades. Headline employment indicators have improved since 2020 but concerns about female labor force participation, job quality, and real wage growth remain.<sup>24</sup>
2. Tamil Nadu has combined high rates of economic growth with human development outcomes. It is geographically the tenth-largest state of India and the second largest economy (after Maharashtra) with a gross state domestic product (GSDP) of Rs. 1,345,108 crores (approximately US\$168 bn) as of 2021-22<sup>25</sup>. The state's fiscal deficit is sustainable and for 2023-24 it is targeted at 3.25 percent of GSDP<sup>26</sup>. Tamil Nadu ranks amongst the best performing states on human development outcomes in India. Eighty percent of the state's population is literate, compared with 73 percent of the India average. Only 11.3 percent of the state's households are classified as below poverty line (BPL) compared with the India average of 22 percent<sup>27</sup>.

### 2.2 Sectoral (or multi-sectoral), State and Institutional Context

3. Tamil Nadu is India's growth engine accounting for 9.7 percent of India's GDP<sup>28</sup>. Despite its higher base, the state has had an average annual GSDP growth of 7.6 percent between FY10/11 and FY19/20, which outpaced India's national GDP growth of 7.0 percent. Even in FY20/21, when the Indian economy contracted by 7.3 percent, Tamil Nadu's real GDP grew by 1.4 percent, thanks to the state's well-diversified economy and a relatively low COVID-19 caseload during most of FY20/21. Tamil Nadu is expected to witness a second year of growth at ~ 8 percent in 2022-23<sup>29</sup>.
4. Three forces shape Tamil Nadu's growth story – urbanization, economic transformation, and ageing. The state's has experienced rapid urbanization over the last four decades with its urban population increasing from 19 million (34 percent of total population) in 1991 to 40.3 million (53 percent) in 2021<sup>30</sup>. This is anticipated to increase to 67 percent by 2030, the highest in the

<sup>22</sup> World Bank. Macro Poverty Outlook (MPO). October 2023

<sup>23</sup> World Bank Poverty and Inequality Platform. <https://pip.worldbank.org/country-profiles/IND>

<sup>24</sup> World Bank Macro Poverty Outlook. Spring 2023. Estimates from PLFS data.

<sup>25</sup> <https://www.mospi.gov.in/data>

<sup>26</sup> In 2022-23, as per the revised estimates, fiscal deficit is expected to be 3 percent of GSDP, lower than the budget estimate (3.63 percent of GSDP).

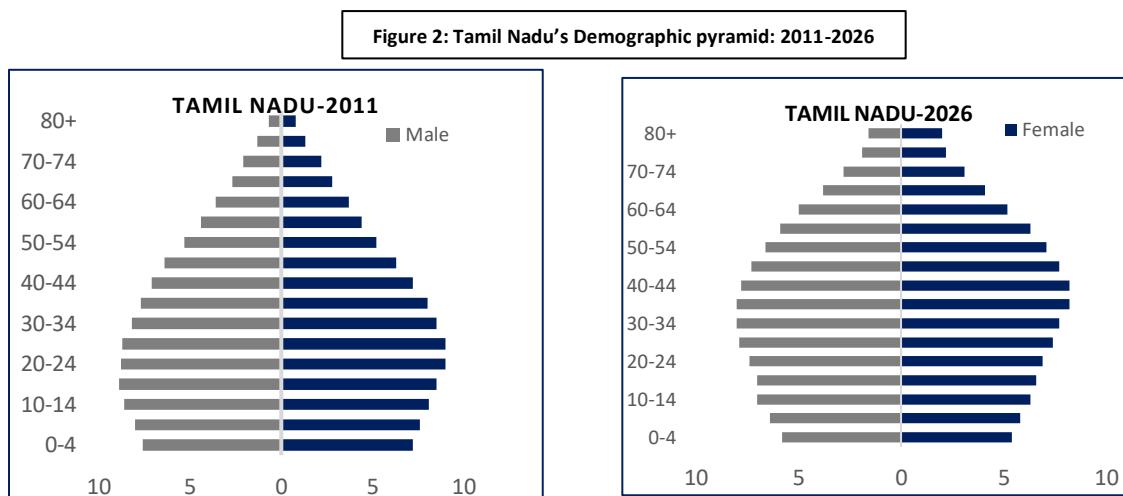
<sup>27</sup> Census, 2011; GoI

<sup>28</sup> Handbook of Statistics on Indian Economy, Reserve Bank of India, 2021

<sup>29</sup> MoSPI, GoI; Estimates in Fiscal Year of April to March

<sup>30</sup> Policy Note 2022-2023, Municipal Administration and Water Supply Department, Tamil Nadu; b) Population Projection for India and States 2011-2036, National Commission on Population, Ministry of Health and Family Welfare, 2019.

country<sup>31</sup>. The state's economy has also moved away from agriculture; services contribute about 50 percent of Tamil Nadu's GSDP, followed by industries/manufacturing (about 36 percent), and the remainder from agriculture<sup>32</sup>. Five industries account for more than half of the total industrial output; these include garments (wearing apparel), textiles, automobiles, food products, and leather and related products<sup>33</sup>. There is considerable variation in growth across districts. A major portion of Tamil Nadu's industrial production happens in industries clusters within 150 km of Chennai. (Figure 1). Tamil Nadu is ageing faster than India: it is projected that the median age in the state will be 35 years by 2021 and 37 years in 2026, which is higher than country's projected median age of 29 years and 31 years during the same period (Figure 2).



5. **Female Labor Force participation (FLFP):** Tamil Nadu's female labor force participation is higher than average, but women continue to be employed in poor-quality jobs, mostly in low paying and informal jobs and enterprises. The FLFP rate was 43.9 percent in FY2022/23 in Tamil Nadu while the male LFP was almost double at 81.2 percent. Women's participation in the State's labor force was at its peak (54 percent) in 1993-94 but came down to 51 percent in 2004-05 and has only been declining since then. It was at its lowest (34 percent) in 2017-18. The relatively high FLFP rate in Tamil Nadu masks two distinct fault lines. First, the gender gap in LFP is higher in urban areas (49.4 pp) than in rural areas (28.3 pp), which is especially relevant against the backdrop of a rapidly urbanizing economy. Second, while more young women in urban areas (15-29 years) in Tamil Nadu join the labor force (21.7 percent) than the national average (20.8 percent), their LFP is much lower than their male counterparts of 59.7 percent.
  
6. **Wage employment:** While 40.4 percent of the women workers in Tamil Nadu are employed in manufacturing and services, the wage gap remains substantial (INR 78.4 for every INR100 a male worker earned) and worse than the Indian average (INR 87.06 for every INR 100 of a male worker).<sup>34</sup> This is partially driven by the gender gap in education and skilling levels. Illustratively, at the Industrial Training Institutes in Tamil Nadu, out of the 88,212 total available seats, only

<sup>31</sup> Report and Recommendations of Fifth State Finance Commission Tamil Nadu 2017-2022, December 2016.

<sup>32</sup> MoSPI, Gol; 2021-23 estimates

<sup>33</sup> ASI, 2020

<sup>34</sup> The wage gap represents occupational segregation as a major proportion of women workers in non-farm sector are engaged in entry level jobs. Source: PAD Tamil Nadu WeSafe project

32.30 percent were filled. Further, only 15.02 percent of the seats were occupied by female trainees, clearly indicating a gross gender divide. Consequently, only 12 percent women are in white-collar jobs while a substantial number are in semi-skilled or unskilled jobs.

7. **Entrepreneurship:** Women own 26 percent of enterprises in Tamil Nadu, highest in India above Kerala (11 percent), Andhra Pradesh (11 percent), West Bengal (10 percent), and Maharashtra (8 percent). Most of these enterprises are categorized as micro-enterprises. A significant share of women who are self-employed (13.6 percent in urban areas and 21 percent in rural areas) are informal wage workers in household enterprises.
8. Structural barriers such as access to housing, care services, safety, and siloed economic planning restrict women's access to employment in non-farm sectors. First, while Tamil Nadu is rapidly urbanizing, about 50 percent of the population continues to live in rural areas and the state's 'growth nodes' are mainly spread across north and western Tamil Nadu<sup>35</sup>. This results in women migrating, sometimes seasonally, for better job opportunities<sup>36</sup> in emerging sectors such as non-leather footwear, wearing apparel, and electronic goods<sup>37</sup>. Second, over 15 percent of Tamil Nadu's employed women are heads of households and over 10 percent have at least one child<sup>38</sup>. This is indicative of latent demand for housing and care options for women to access gainful employment opportunities. Third, as per NFHS-5, over 38.1 percent women in Tamil Nadu experience spousal violence, significantly higher than the national average of 29 percent. Additionally, micro studies show that various factors affect women's overall mobility. These include the fear or risk of harassment, unsafe public spaces and public transport<sup>39</sup>. For more women to work in Tamil Nadu, housing, care services and safe public spaces and workplaces emerge as necessary conditions. Although several central and state schemes support enabling service delivery for housing, care, and safety there is no overarching investment framework at the state and sub-state levels to support women's work as part of the state growth strategy.<sup>40</sup> For instance, delivery of care services is primarily through the network of *anganwadis* and has not really evolved to meet the needs of women who work in non-farm sectors in urban and semi-urban areas (for instance, informal women workers would require childcare services beyond the *anganwadis* timings of 8 am to 3.30 pm).
9. Between late 2023, the Government of Tamil Nadu and the World Bank undertook a baseline assessment to unpack the barriers that prevent women from accessing jobs and entrepreneurship opportunities in non-farm sectors in the state. Interviews were conducted with over 2,500 female respondents across 15 districts, as well as with over 20 employers in the priority sectors to capture both the demand and supply side bottlenecks. Data reveals that women's willingness to work is quite high, with some decline due to marriage and childbearing. Most women prefer permanent, government jobs and service sector employment—just 5 percent of women prefer jobs in the

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<sup>35</sup> The analysis of the GDDP of districts in Tamil Nadu indicates that the distribution of spatial and sectoral growth in Tamil Nadu is skewed and the skewness is increasing. There is a regional pattern of growth in Tamil Nadu and districts in the top quartile in terms of GDDP are in North and Western Tamil Nadu. The districts in the lowest quartile are in the East and Southern Tamil Nadu.

<sup>36</sup> Economic Survey 2016, GoI

<sup>37</sup> Department of Industries and Commerce, GoTN; 2022

<sup>38</sup> NFHS 2029-2021, GoI; World Bank analysis

<sup>39</sup> Chennai City Partnership Program, World Bank 2021

<sup>40</sup> Based on consultations across ten districts in Tamil Nadu: Villupuram, Kallakuruchi, Cuddalore, Pudukkottai, Sivagangai, Ramnathapuram, Sivakasi, Virudhanagar, Madurai.

private sector. However, one in four women prefers to have her own business rather than a salaried job, highlighting the potential of female entrepreneurship in the state. To meet this potential, female entrepreneurs seek financial support from the government since 78 percent of respondents reported they would not be able to raise resources if they wanted to start their own business. Demand for work in food processing and health and wellness sectors is also quite high. Single women report safety concerns as the most important barrier to employment, whereas married women cite household duties/ lack of family support as the most significant constraint. Older women significantly lack employability skills while young women require support with job applications and interviews as well as digital skills.

10. To achieve trillion-dollar economy status, Tamil Nadu recognizes the criticality of female labor force participation. Tamil Nadu's macro-economic strategy, policy, and administrative planning focus on growth through proactive catalytic investments in new manufacturing and services. In 2021, the Chief Minister set an economic vision for Tamil Nadu to become a US\$1 trillion economy by 2030<sup>41</sup>. To achieve this, the state's policy and programmatic response supports industrial growth, particularly manufacturing, and creation of a multi-faceted skilling and entrepreneurial eco-system. Such initiatives include the *Nan Mudhalvan*<sup>42</sup>, Tamil Nadu Private Jobs Portal<sup>43</sup>, Startup TN, working women's hostels co-located with industrial centers/special economic zones<sup>44</sup>, regular cash grants to female graduates<sup>45</sup>, and industrial parks for women-owned businesses. The state has framed a dual programmatic response to support women's aspirations to better quality jobs and to growing enterprises. This involves skilling, employment support and simultaneous delivery of social protection measures to cater to the needs of vulnerable groups of women.
11. Delivering quality jobs<sup>46</sup> in emerging sectors requires an integrated/multi-sectoral strategy: Creating an ecosystem that enables women to access employment in non-farm sectors requires building public sector capacity, tackling institutional fragmentation within and among relevant departments, and building partnerships. Innovative initiatives on delivery of enabling services to improve women's access to quality jobs, including partnerships with non-governmental organizations and the private sector, have been fragmented in Tamil Nadu. Engaging a broad base of state and non-state actors, particularly the private sector, will help accelerate integration between demand and supply interventions, and accelerate job creation and access to quality jobs for women in Tamil Nadu. These initiatives would need to be harnessed around an overarching policy platform at the state and local levels, considering the state's specific context and allowing for required flexibility and adaptation. This would contribute to scale-up the state's dual programmatic approach and leverage the potential of women as economic agents.

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<sup>41</sup> <https://www.hindustantimes.com/india-news/stalin-aims-to-make-tamil-nadu-usd-1-trillion-economy-by-2013-101626801217235.html>

<sup>42</sup> *Nan Mudhalvan* literally translates to I am powerful. This initiative, coordinated by the State Skills Development Corporation and CM's office delivers training in soft skills, digital and analytical thinking as well as placement support to youth.

<sup>43</sup> <https://www.tnprivatejobs.tn.gov.in/Home/index>

<sup>44</sup> Tamil Nadu Industrial Housing Private Limited (TNIHPL) plans to develop working women hostel in SIPCOT Industrial Park, Siruseri.

<sup>45</sup> Under the Higher Education Quality Assurance Scheme, the state makes an unconditional financial transfer of US\$14 to high-school graduates from government-run schools, who decide to pursue higher education (Pudhumai Pen Scheme)

<sup>46</sup> The operation will use the OECD framework to define quality jobs which includes three parameters: (i) earning quality; (ii) labor market security and (iii) quality of the working environment. <https://www.oecd.org/employment/job-quality.htm>

### 3. Program Description

12. The Program Development Objective is to improve women's access to quality jobs<sup>47</sup> in non-farm sector. The achievement of the PDO will depend upon the results on the following indicators:
  - i. People benefiting from greater gender equality (disaggregated by gender and youth) (percentage) (New Corporate Scorecard)
  - ii. Beneficiary women who are wage employed or self-employed in non-farm sectors (percentage of all beneficiary women) (disaggregated by sectors – emerging sectors, other sectors; age - 18-29, 30-59 years)
  - iii. Beneficiary women who are wage employed or self-employed in non-farm sectors and who self-report increased wage income or increased sales volume/gross revenue, respectively (percentage of all beneficiary women who are wage employed or self-employed)
  - iv. Beneficiary women utilizing enabling services (percentage of all beneficiary women)
  - v. Districts that have developed and implemented 'Women's Quality Employment Plans' (WQEPs). (number)
13. In Tamil Nadu, there are selected non-farm sectors that have greater potential in creating access to quality jobs for women. Within non-farm sector, the Operation will prioritize sub-sectors that have currently demonstrated high growth trajectory, making greater contribution in terms of GSDP and in creating job opportunities. These include, but are not limited to, garments (wearing apparel), textiles, automobiles, food products, and leather and related products. These priority non-farm sectors also include important emerging sectors such as non-leather footwear, wearing apparel, digital/electronic goods, green jobs etc. Based on their aspirations and potential capabilities, the Operation will provide customized support to different categories of women to engage in self-employment or wage employment activities in these priority sectors.

#### ***Government Program***

14. The GoTN implements a multi-sector program that focuses on women's economic empowerment through skill building, enterprise support, infrastructure development, and service delivery interventions. Complementing the State's economic vision, the approved Tamil Nadu Women's Policy (January 2024) puts forward a comprehensive plan for women's empowerment. It aims to "*provide women with improved access to health, education, and employment, to create conducive conditions that allow gender norms to be restructured and behavior-linked changes to occur, to eliminate discrimination, abuse, and violence against women, and to empower women to break gender stereotypes, encourage them to take up more leadership and decision-making roles and excel in all fields.*" To deliver on this mandate, the GoTN intends to expand targeted investments in gender-sensitive education systems, health and nutrition services, business development support to women enterprises, digital literacy, financial inclusion, and skills.
15. The GoTN's multi-sector programs (referred to as 'programs'), will be the elements of the new approved State Women Policy implementation. The major programs that are relevant for women employment initiatives include, but are not limited to (i) HEAS (*Pudhumai Penn*); (ii) scheme

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<sup>47</sup> The operation will use the OECD framework to define quality jobs which includes three parameters: (i) earning quality; (ii) labor market security and (iii) quality of the working environment. <https://www.oecd.org/employment/job-quality.htm>

supplying sewing machine for women ((Sathyavanimuthu Ammaiyan Ninaivu); (iii) working women hostels; (iv) programs to mitigate sexual harassment of women; (v) New Entrepreneur cum Enterprise Development Scheme (NEEDS); (vi) the Unemployed Youth Employment Generation Program (UYEGP); (vii) Tamil Nadu Startup Seed Fund (TANSEED); (viii) Entrepreneurship Development Program for Women; (ix) Short-term training (STT) and Recognition of Prior Learning (RPL); and (x) *Naan Mudhavalan scheme*. The ‘programs’ are comprised of State led as well as central schemes and are implemented through multiple state government departments. These include Department of Social Welfare and Women’s Empowerment (DSWWE), Department of Rural Development and Panchayat Raj including TN Women’s Development Corporation (WDC), Department of Industries and Commerce, Department of Municipal Administration and Water Supply, Tamil Nadu Working Women Hostels Corporation Limited (TNWWHCL), Special Program Implementation Department (SPID), TN e-Governance Agency (TNeGA), Department of Micro, Medium and Small Enterprises (DMSME) including Entrepreneurship Development and Innovation Institute (EDII) and Tamil Nadu Startup and Innovation Mission (TANSIM), and TNSDC. The focus across these departments is strengthening institutional capacities, and enhancing scale, quality, and efficiency to effectively deliver these programs.

### Theory of Change

16. The operation will support the GoTN to promote and implement integrated interventions to enhance employment opportunities and access to quality jobs for women in non-farm including emerging sectors. The major constraints that hamper FLFP in Tamil Nadu include but are not limited to (i) barriers to employability such as gaps in skill development and entrepreneurship interventions; (ii) inadequate delivery of enabling services to mitigate barriers for women to access quality jobs; and (iii) limitations in institutional capacity to effectively coordinate and implement initiatives that promote better employment opportunities for women. The operation will support the GoTN to implement interventions that will enhance better labor market outcome for women, improve outreach, access and utilization of enabling services, and strengthen planning and delivery processes and partnerships to drive women’s employment.

Challenges	Activities	Outputs	Short- & Medium-Term Outcomes	Long Term Outcome
<b>RA1: EMPLOY: Improved labor market performance for women in non-farm sectors including emerging sectors</b>				
Barriers to employability	Skills training & entrepreneurship	Improved skilling and entrepreneurship outcomes  • Women receive skill development training, apprenticeship & on-the-job training in emerging sectors (renewable energy, IT, apparel, food processing, automobiles) • Women-led enterprises in non-farm sectors receive financial & non-financial support • Young women receive scaled-up information, career counseling, and internships as part of the HEQAS	Gainful economic opportunities  Improved labor market outcomes for women in non-farm sectors including emerging sectors Improved productivity and increase in business volumes for women entrepreneurs in non-farm sectors	
<b>RA 2: ENABLE: Enhanced delivery of enabling services to promote women's employment</b>				
Inadequate delivery of enabling services	Technical partnerships to boost quality of enabling services	Scaled-up and effective delivery of enabling services  • Scaled-up & coordinated delivery of enabling services in select districts through implementation of WQEPs • WQEPs leveraged to develop zone-level women's safety plans in priority ULBs (tier 2 and tier 3) • Quality framework in place for both private and public sector care services. • Expanded basket of care services according to local economic context	Gainful economic opportunities  • Improved outreach & utilization of enabling services in selected districts • Improved access to care services in industrial clusters & economic zones	Enhanced employment for women in non-farm sectors
<b>RA3: EMPOWER: Strengthened state capacities, technical partnerships, and institutional structures for women's employment</b>				
Poor institutional capacities	State & district level planning architecture	Planning and convergence for women's employment  • Common Results Framework developed • State-led platform for women's employment established in partnership with private sector players and technical partners • Financial inclusion and digital literacy for women entrepreneurs	Planning processes established to drive women's employment  • Strengthened economic planning processes at the state and district- levels to prioritize investments on women's employment • Partnerships with industry players, business associations and think tanks established	

### **PforR Program Scope**

17. The PforR Program (“P”) is a subset of the government program (p). The PforR Program will support the existing government programs and will be aligned with the GoTN priorities to enhance FLFP through improved labor market performance and access to quality jobs for women. The government program has an estimated budget of US\$832.85 million over the period 2024-2029. The PforR Program with an estimated value of US\$621.01 million will support integrated interventions responding to evolving needs and aspirations of women, tapping potential of emerging sectors, supporting innovative solutions in enabling services – care, housing, and safety and, strengthening planning across government levels and sectors. The Program will also support institutional strengthening and system development interventions to facilitate effective delivery of services and create a state and district level platform for coordination of efforts.
18. The proposed Tamil Nadu Women Employment and Safety (TNWeSafe) PforR Program (Program) will support government efforts to address low FLFP and to improve women’s access to quality jobs in non-farm sectors including emerging sectors. Traditional government programming on women’s employment has adopted a sector-specific delivery approach; either through skill development, rural livelihoods, entrepreneurship promotion, or school-to-work transition related interventions. The operation proposes an alternate, integrated programming approach to address bottlenecks that impede women’s access to quality jobs by: (i) strengthening planning capacities across levels of government via the state-led platform on women’s employment and district-led women’s quality employment plans; (ii) promoting targeted skilling and entrepreneurship support linked to non-farm sectors including related emerging sectors; and (iii) improving delivery of enabling services in (a) women’s safety including measures to reduce GBV such as awareness campaigns, safe mobility, and enforcement of existing laws, (b) facilitate access to affordable housing, and (c) access to care services. The Program direct beneficiaries include adolescent girls and working age-women in Tamil Nadu. Some target groups that the Government has already identified are members of DSWWE’s Industrial Cooperative Societies, those employed in non-farm sectors, women in higher education, women on a career break due to post-partum and personal reasons, women with family care responsibilities, vulnerable women such as victims of domestic violence, transgender individuals, sex workers, those in conflict with the law, single mothers, and destitute mothers.
19. Overall, the Program will be rolled out statewide. However, considering that the Program focuses on non-farm sectors including emerging sectors, priority will be given to areas where there are more challenges and more opportunities to improve FLFP and create quality jobs for women, such as urban and semi urban areas including areas around expanding industrial clusters. Within the non-farm sector, the Program will prioritize sub-sectors that have a demonstrated high growth trajectory including those with minimum environmental and social impacts. These include garments, non-leather footwear, automobiles, green jobs, and digital sectors. GoTN under the “Guidance Tamil Nadu” initiative (Nodal Agency for Investment Promotion) identifies these as “sunrise sectors”. The roll-out and coverage of the Program will also vary depending on the nature and categories of the interventions. For example, new intervention areas related to access to care and safety services will focus on urban areas and will be expanded gradually throughout the State, including options for piloting. However, common intervention areas such as skill development, entrepreneurship, partnerships, policy, and platforms will have wider outreach and coverage right from the beginning. Specific interventions and sectors that would offer quality jobs for different

categories of women will be identified considering women's aspirations, opportunities, and prevailing constraints. The details will be elaborated in the Project Operation Manual (POM) and specific guidelines will be developed to facilitate the implementation of specific technical design elements of the Program.

20. The Program is a sub-set of a government program. The elements of the government program that are excluded from the PforR Program include farm-based livelihoods and enterprises, employment in public works, investments in Gram Panchayat Development Plans, investments that are on the exclusion list as determined by the Environmental and Social Systems Assessment, and investments that do not target women beneficiaries. The Government program has a budget of US\$832.85 million, and the PforR Program will provide financing of US\$631.56 million over the period 2024-2029.
21. Program Result Areas (RA): The Program will support three complementary RAs which are aligned with the PDO and other program outcomes. These are (i) EMPLOY: Improved labor market performance for women in non-farm sectors including emerging sectors; (ii) ENABLE: Enhanced delivery of enabling services to promote women's employment; and (iii) EMPOWER: Strengthened state capacities, technical partnerships, and institutional structures for women's employment. A detailed description of the Program RAs are as follows:
22. *RA 1: EMPLOY: Improved labor market performance for women in emerging sectors:* RA 1 is focused on improving the access, relevance and quality of skills training programs, career support services, and incubation and acceleration services for women in Tamil Nadu.
  - a. *Skills development support:* On skills training, the Program will deliver training in technical, social, emotional, digital, and financial literacy skills to women above 14 years of age to help them become job ready, aligned with existing government program initiatives. To ensure support for trainees to find employment, the package of career support services such as career counselling, internship and apprenticeship opportunities, job-search facilities, and placement support will complement training. Given the needs of the industry in Tamil Nadu and priorities of the government, the Program has a special focus on training in non-farm including emerging sectors as discussed earlier. Therefore, courses will be developed or upgraded, as the need may be, in these areas. The Government recognizes that there is a need to customize training programs and career support services to meaningfully serve different groups of women with varying backgrounds, circumstances, and needs.<sup>48</sup> Conceptualizing and delivering services that are relevant and accessible to different groups will require concerted efforts. For example, a preliminary assessment shows that supporting the first-year students of the *Pudhumai Penn* Scheme (HEAS) beneficiaries to transition into higher education would need focus on life skills such as communication, negotiation, logical thinking, language skills, personal safety, and mental health.

While skills training is a key part of ensuring greater participation of women in the labor market, it will be important to ensure that women are provided access to information

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<sup>48</sup> Some groups that the Government has already identified are members of DSWWE's Industrial Cooperative Societies, those employed in non-farm sectors, women in higher education, women on a career break due to post-partum and personal reasons, vulnerable women such as victims of domestic violence, transgender individuals, sex workers, those in conflict with the law, single mothers, and destitute mothers.

services, career counselling, internship opportunities and job search support, independent of skills training programs. This is especially important for women who require support in searching for and obtaining employment, but may not require skills training, or are already accessing skills training, or do not have the ability to access skills training.

- b. *Entrepreneurship support:* Entrepreneurial support will be tailored to the needs of subsistence as well as growth-oriented business, trying to identify potential movers from the first to the second. While the skills training and career services would be valuable for all, the Program also envisages a special focus on delivering quality services to support women-led businesses and prospective entrepreneurs in non-farm including related emerging sectors. This will recognize that some enterprises will create jobs while others are the only viable option available to women. For the first group, this will include incubation programs for early-stage women-led businesses through state/ regional/ district level incubation facilities and acceleration support services to help existing women-led businesses scale up. These incubators and accelerators will strengthen access to business, marketing, legal, digital, and other support services for increased productivity of women-led enterprises in non-farm and related emerging sectors. Through existing government programs and interventions, support will be provided on financing for women entrepreneurs and women-led startups across various sectors. This will include facilitating the design and/or enhancement of mechanisms for ensuring access to innovative financing options (co-financing, competitive business proposals, staggered grants, etc.), enabling connections with financial institutions, and mobilizing funds from private sector, possibly through harnessing Corporate Social Responsibility monies. For the second group, attention will be given to poor and vulnerable women, with limited opportunities, to create access to economic inclusion opportunities and help them make progress towards sustainable livelihood. In this regard, customized skill development, technical assistance and other supports including access to resources will be provided through the framework of micro, small and medium enterprises.

The interventions supported under this RAs will have positive climate change adaptation and mitigation impacts. Considering the Program's focus on the non-farm sector, primarily in urban areas, the employment opportunities created through the program will have less direct dependence on the natural environment. Consequently, the jobs created will be less vulnerable to the impact of the identified hazards such as floods, cyclone, and storms. In addition, the skill training and entrepreneurial technical support activities will mainstream climate change adaptation and mitigation related topics. The emphasis will be on jobs in the non-farm sector that directly build resilience to the climate risks identified earlier. These non-farm sectors supported through the Program will also include self-employment and wage employment activities related to green jobs that utilize renewable energy and energy-efficient mechanisms.

23. *RA 2: ENABLE:* Enhanced delivery of enabling services to promote women's employment: Under RA2, the Program will support the development of a framework to improve coordinated outreach, quality, and impact of enabling services. It will also support the development of a system for end-to-end affordable, accessible, and sustainable care support to expand services across the entire State as much as possible. The services would include improved access to safety/violence prevention in public places and workplaces, safe transport, affordable housing options, and care

services. To achieve this, the Program will incentivize integrated, medium-term planning and a convergence of investments through the design and roll-out of Women's Quality Employment Plans (WQEPs) at the district level in selected districts.

24. Through WQEPs, districts will develop and implement block-level plans to deliver appropriate care services. The WQEPs will support mapping and strengthening of access to appropriate childcare and elderly care services and facilities. Support will be provided for the creation of a quality framework and the formation of a cadre of trained caregivers in elderly care and childcare through ongoing government initiatives. The proposed quality framework will help guide investments in the care economy to (i) expand the basket of context-specific care service provision; and (ii) leverage private sector partnerships to design and deliver an optimal mix of enabling care services in selected economic zones with a focus on industrial clusters. For example, some interested women can be supported to pursue career in childcare and elderly care, which would support both direct and indirect employment.
25. The WQEPs will also help prioritize investments in affordable housing options. This will include allocation of cash vouchers and strengthening of access to hostel facilities and temporary housing options for migrant and other women workers in and around urban areas (especially tier II and tier III cities). Specialized mobility options for women will also be supported through collaborations with private and public transportation service providers including training and promotion of more women drivers.
26. Additionally, the Program will support the development and implementation of a comprehensive communication plan. It will support a helpline system to facilitate access of women to information related to enabling services for employment. It will also support the development of customized information, education, and communication (IEC) materials and a communication campaign, including sensitization on GBV, at all levels to increase awareness about the importance of supporting women in gainful employment opportunities and also address the socio-cultural norms including GBV. The communication campaign will use existing government programs and those of traditional/cultural structures and of Community Based Organizations (CBOs).
27. Under this RA, the development of District WQEP and the awareness raising campaign will incorporate climate adaptation and mitigation measures. The Development of District WQEP will be guided by specific assessments that include identifying the available opportunities, resources and sectoral areas with greater potential to promote sustainable and climate friendly livelihood options for women and define appropriate investment plan. Priority will be given to emerging sectors which promote more green jobs (renewable energy such as solar energy, etc.). The District WQEP will mainstream relevant actions from the TNSAPCC. The extensive awareness raising campaign that will be supported through the Program will also include modules on climate change.
28. *RA 3: EMPOWER:* Strengthened State capacity, technical partnerships, and institutional structures for women's employment: Under RA3, the State will develop a common results framework and workplan to support the roll-out of the State's women policy and efforts to significantly increase FLFP and thereby contribute to the State's goal of achieving a trillion-dollar economy. The Program will support setting-up of a state-led platform for women's employment anchored within and managed by the SPID. The platform will bring together priority departments, public

institutions, private sector, academia and research institutions, civil society organizations, development partners, women entrepreneurs, and industry associations. The Program will also create district level platforms that include relevant stakeholders to coordinate and promote women's employment and entrepreneurship through the implementation of WQEP. The State-led platform, with support from district platforms, will take on a leadership role to coordinate multi-sectoral implementation efforts and drive evidence-based decision-making through improved analytics, information sharing, and partnerships.

29. The WeSafe Program will support the development, adoption and implementation of relevant state level policies and a regulatory framework. Relevant policies and regulations will be supported to facilitate a conducive environment and supportive investments to expand FLFP in non-farm including emerging sector and women entrepreneurship. In addition, the Program will develop targeted partnerships and outreach arrangements to engage private/public sector and government departments to facilitate specific collaboration and commitment to support women employment and entrepreneurship opportunities through training, internships, apprenticeships, and job placement. It will also bridge capacity gaps in relevant implementing institutions at the state and local levels to strengthen the design and implementation of economic inclusion interventions for women. The Program will develop integrated and digitized delivery and monitoring systems for effective design, implementation, monitoring and evaluation of women centered multi-sectoral economic inclusion and job creation interventions. The systems will include Management Information Systems (MIS), monitoring systems, and job portal. Additionally, it will leverage technologies for capacity building, knowledge sharing, and training of officials at the state level and selected Districts and Urban Local Bodies (ULB) on women's economic empowerment and labor market integration.
30. Additionally, the RA will incentivize strong, on-ground collaborations with established technical partners in the State. These include partnerships with industry associations, institutes of eminence, and private organizations for a range of initiatives such as digital inclusion, life skills and incubation support for young adults, and innovations in delivering enabling services through WQEPs. Potential partnerships will improve results on strengthening access and quality of housing and mobility options for women workers, female students, and women entrepreneurs.
31. The policy implementation and capacity building activities under RA3 will mainstream climate change related actions. The State-Led platform to be created will include institutions responsible for climate change agenda. The relevant climate change actions from the TNSAPCC will be incorporated in the plan to promote quality jobs for women and in the dialogue to advance sustainable employment and job creation opportunities for women. In addition, the platform will facilitate training and increased awareness on climate change among the member stakeholders including the private sectors, MSMEs and industries. The training and capacity building plans supported under this RA will incorporate topics on climate change.

#### ***Institutional and Implementation Arrangements***

32. The TNWeSafe operation will be anchored within the SPID. SPID will convene and ensure coordination amongst the priority departments for planning, implementation and monitoring of activities and fund flows. The role of the SPID is key to ensure seamless coordination across stakeholders. SPID already acts as a nodal coordinating agency between line departments for

flagship state-led programs (e.g., *Naan Mudhalvan scheme*). Therefore, SPID's existing role as a 'state coordinator' will be leveraged to deliver the TNWeSafe operation. Given the proposed innovative approach to drive inclusive employment opportunities for women in Tamil Nadu, the priority departments and corporations will include DSWWE, DMSME and Tamil Nadu Skills Development Corporation (TN-SDC). At the district level, DSWWE, DMSME and TNSDC, through their district level offices, will be responsible for the implementation of the operation.

33. A state level Program Steering Committee (PSC), chaired by the Development Commissioner will be established. The PSC members will include the Secretaries of Finance Department, SPID, DSWWE, DMSME, Director General of TNSDC and heads of other relevant institutions. The PSC will provide oversight for state level interventions and will ensure inter-departmental coordination. It will meet annually to: (i) review progress in the achievement of the overall Program objective and guide implementation; (ii) approve the annual action plan and budget for the activities to be undertaken within the operation; (iii) ensure smooth inter-departmental coordination to aid implementation; and (iv) provide strategic policy advice and orientation.
34. A Program Management Unit (PMU) will be established at the State level and will be housed under SPID. The PMU will be housed in a separate society created within SPID and headed by the Project Director (PD) reporting to the Development Commissioner through Secretary, SPID. A government order for the same was issued by GoTN on January 23, 2024. PMU will be responsible for the coordination and management of the operation in collaboration with the implementing institutions. The PMU will provide general oversight, technical support, supervision, M&E, and overall planning. At the district level the project team will include officers on deputation from DSWWE, DMSME and TNSDC. The district team will report to the District Collector through Project Director<sup>49</sup> for Women Self-Help Groups (*Mathi*), in Tamil Nadu Corporation for Development of Women. The district team will also work in close consonance with Assistance Project Offices (APO) from the National Urban Livelihood Mission.

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<sup>49</sup> Following a gradual roll out plan of the program, District Project Management Unit (DPMU) headed by the District Project Manager will be established under the District Collector. The District Project Manager will be supported by Young Professional and Office Executive. The DPMU will coordinate with the district level officials i.e., District Social Welfare Officer(DSWO), General Manager- District Industries Centre(MSME) and Programme Manager (TNSDC) to support the project activities. The District Project Manager will report to the Project Director

## 4. Methodology for Environmental and Social Systems Assessment (ESSA)

### 4.1 Introduction to ESSA and Scope

35. For each proposed PforR operation, the World Bank assesses at the Program level, the potential Environmental and Social (E&S) effects of the PforR, including direct, indirect, induced, and cumulative effects as relevant; the borrower's capacity in terms of the legal framework, regulatory authority, organizational capacity, and performance to manage those effects; and the likelihood that the proposed operation achieves its overall Program Development Objectives in a sustainable manner.
36. The ESSA provides a comprehensive review of relevant government systems and procedures that address environmental and social issues associated with the Program. The ESSA describes the extent to which the applicable government environmental and social policies, legislations, program procedures and institutional systems are consistent with the six 'core principles' of OP/BP 9.00 and recommends actions to address the gaps and to enhance performance during Program implementation. The core principles are:
  - a) Promote environmental and social sustainability in the Program design; avoid, minimize, or mitigate adverse impacts, and promote informed decision-making relating to the Program's environmental and social impacts;
  - b) Avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program;
  - c) Protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the Program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and, (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards;
  - d) Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at the minimum restoring, their livelihoods and living standards;
  - e) Give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of the Indigenous Peoples and to the needs or concerns of vulnerable groups;
  - f) Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.
37. Specific objectives of ESSA are:
  - a. to identify the potential environmental and social impacts/risks applicable to the Program interventions,
  - b. to review the policy and legal framework related to management of environmental and social impacts of the Program interventions,
  - c. to assess the institutional capacity for environmental and social impact management within the Program system,

- d. to assess the Program system performance with respect to the core principles of the PforR instrument and identify gaps in the Program's performance,
- e. to include assessment of M&E systems for environment and social issues; and
- f. to describe actions to fill the gaps that will input into the Program Action Plan in order to strengthen the Program's performance with respect to the core principles of the PforR instrument.

## 4.2 Methodology

38. ESSA refers to the process for evaluating the acceptability of a borrower's system for managing the Program's E&S risks in the operational context, and to the final report which is an output of that process. The ESSA process involves a multistep methodology in which the World Bank team analyzes the E&S effects, including indirect and cumulative effects, of activities associated with the defined Program; analyzes the borrower's systems for managing the identified E&S effects, including reviewing practices and the performance track record; compares the borrower's systems - laws, regulations, standards, procedures, and implementation performance against the core principles and key planning elements to identify any significant differences between them that could affect Program performance; and recommends measures to address capacity and performance on policy issues and specific operational aspects relevant to managing the Program risks such as staff training, implementing institutional capacity building programs, and developing and adopting internal operational guidelines. The World Bank ESSA team and the borrower worked closely to identify and consider the range of E&S effects that may be relevant to the Program. The PforR approach distinguishes specific roles and responsibilities regarding major steps and tasks at the various phases of the program cycle.

39. The ESSA process comprises the following elements:

- a. **Preliminary screening:** Preliminary screening is done to ensure that activities that are judged to be likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people are not included in the PforR design and are excluded from the Program. The Exclusion List is provided later in this Assessment.
- b. **Secondary Literature Review:** The team reviewed the relevant secondary literature, which includes key project documents, applicable Acts, Rules, policies, Government Orders, Circulars, Gazette notifications, peer-reviewed journal articles, paper articles and blogs etc. The desk review focuses on understanding the existing policy, operational procedures, institutional capacity, and implementation effectiveness relevant to the activities proposed under the Program. Using the findings of the secondary literature, the ESSA team carried out the screening, developed questionnaires and checklists for stakeholder engagement. The list of secondary literature reviewed is included in Annexure A. The detailed review matrix of the legal and regulatory framework applicable to the program is included in Annexure B.
- c. **Stakeholder engagement** is an essential element of the ESSA process. Through this engagement, both internal and external stakeholders get an opportunity to meaningfully participate in the ESSA process, inform the preparation of the ESSA report, and provide meaningful inputs throughout the lifecycle of the operation. Generally, during the PforR preparation process, field-level one-to-one and focused group discussions, community

consultations and stakeholder workshops are conducted. Glimpses of stakeholder consultations undertaken, and site visits conducted for ESSA preparation are given in Annexure C.

- d. Analysis: Using secondary literature and the information collected during the stakeholder engagement process, the ESSA analyses the borrower's applicable systems, considering the system both as it is defined in laws and regulations, and as it is implemented in practice. The purpose of this analysis is to determine the systems' capacity to manage the program's environmental and social risks during preparation and throughout implementation.
- e. Recommendations: ESSA identifies measures and actions to manage any significant gaps in the borrower's capacity to implement E&S management systems at a level commensurate with the identified risks to the Program, and consistent with the Bank's core principles and planning elements. The Bank and the borrower together agree to implement these as part of the Program.
- f. Disclosure: The draft ESSA report is required to be disclosed before program appraisal so that the views of all stakeholders as well as interested members of the public may be solicited and considered before Program decisions are made final. Further, the ESSA Report needs to be finalized and the final version needs to be disclosed by end of Appraisal. Details of the final disclosure workshop will be provided in Annexure D.

#### 4.3 ESSA report preparation process

40. The World Bank team prepared this ESSA report providing an overview and analysis of the relevant National and Tamil Nadu state government's policies and regulatory frameworks for the environmental and social aspects related to this project and assessed the capacity and systems of the major implementing agencies. The TNWeSafe Program will be anchored within the Special Program Implementation Department (SPID). The priority departments and corporations will include (i) Social Welfare and Women Empowerment Department (SWWED); (ii) Micro, Small and Medium Enterprises Department (MSMED); (iii) and Tamil Nadu Skills Development Corporation (TNSDC). The systems of these organizations which will be primarily responsible for implementation of the proposed program interventions, will be assessed to ensure that these agencies are fully capacitated to implement all interventions under the PforR in adherence to the six 'core principles' of OP/BP 9.00. The ESSA will also recommend actions to address the gaps and to enhance performance during Program implementation.
41. The Bank team interacted with the state and district level officials from the priority departments, to understand the systems and procedures followed by them in implementing specific schemes in the state. Detailed Environment and Social checklists were prepared, tailored to the role and mandate of the priority departments. These were administered to the department nodal officers and/or an officer designated by them. Based on these interactions and material obtained from the departments, the roles and responsibilities as well as the procedures followed by these departments were documented and studied to determine the extent to which they address environmental and social issues. Preliminary findings of the ESSA were also shared with nodal officers from various departments and the PMU staff for their inputs.
42. Since TN WeSafe is a multisectoral operation having multiple beneficiaries and implementing partners, this Program has a varied group of stakeholders. Some of the key stakeholders include women beneficiaries of the Schemes, entrepreneurs, school and college students, trainees and

other actual and potential beneficiaries. These beneficiaries would cut across age groups, location, caste, tribe, education level and economic strata. The key personnel involved with the training partners, skilling and training centres, incubation centres, working women's hostels and childcare facilities would also be important stakeholders. Additionally, the program implementing agencies from all the implementing departments including staff at the district level would be stakeholders.

43. As part of the consultations process to inform the ESSA, the team conducted multiple virtual and in-person discussions with relevant stakeholders. Detailed written questionnaires were shared with implementing agencies. The extensive responses and supporting documentation received in response have fed into this assessment. A day long workshop with all implementing agencies was held on November 24, 2023. Further field visits were conducted on February 15 and 16, 2024. Consultations were held with beneficiaries of the Pudhumai Penn Scheme, Naan Mudhalvan Scheme, entrepreneurs benefitting from the NEEDS and UYEGP Schemes of the MSME Department, as well as beneficiaries of the Short-Term Skilling courses offered by the Tamil Nadu Skills Development Corporation. Discussions were held with implementing officials including district level personnel, and site visits to see a sample of training and skilling centres, incubation centres, as well as working women's hostels were also conducted. Detailed notes from the discussions are given in Chapter 10.
5. Using the data/information collected through the consultations and the secondary research, the ESSA team carried out the analysis of strengths and the weaknesses of the existing regulatory and institutional systems that are being considered in the program and identifying gaps that need to be addressed through the Program Action Plan (PAP). The ESSA report is a product of the World Bank team<sup>50</sup> and includes inputs from the GoTN representatives at various levels. The inputs received from consultation and the participants of the ESSA disclosure and consultation workshop have also been considered and incorporated in the draft ESSA prior to Program appraisal. Activities undertaken towards preparation ESSA report commenced in November 2023 and have been completed by May 2024, after which the final report will be disclosed.

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<sup>50</sup> The World Bank team responsible for this ESSA includes Anuja Shukla <[ashukla7@worldbank.org](mailto:ashukla7@worldbank.org)> (Environmental Specialist), Devika Bahadur <[dbahadur@worldbank.org](mailto:dbahadur@worldbank.org)> (Social Development Specialist) and Ashweetha Shetty [ashetty5@worldbank.org](mailto:ashetty5@worldbank.org) (Resident Consultant, WeSafe Program)

### **Legal and Regulatory Framework applicable to the program**

44. The legal and regulatory framework for management of environmental and social factors relevant for the program activities at the national and state level are strong.
45. **Environment:** The legal and regulatory framework for Environment Risk Management in context of interventions in this PFR are robust and well established at National and State level. Considering the temporary construction related risks in refurbishment related works (if any), the national level legal instruments like Environment (Protection) Act, 1986 (amended in 1991), Construction and Demolition Waste Management Rules, 2016, National policy on Safety, Health and Environment at Workplace, Model Building By-laws 2016 and National Building Code, 2005 are relevant and sufficient for guiding the program interventions.
46. The National Occupational Standards along with other laws on Sustainable Waste Management and Pollution Management and Mitigation - like Water Act, 1974, Air Act, 1981, The Noise Pollution Rules, 2000, The E-Waste (Management) Rules 2016, The Batteries (Management and Handling) Rules, 2020 Plastic Waste Management Rules 2016, The Solid Waste Management Rules, 2016, provide comprehensive and sufficient provisions to sustainably manage waste related concerns and also manage/mitigate temporary pollution impacts expected from the program interventions. These rules also provide a strong guidance and foundation for designing environmentally sensitive outreach programs, training modules and communication campaigns under the current PFR.
47. In addition to National frameworks, the state of Tamil Nadu itself has a very robust set of rules which will guide the interventions under this PFR. Since the PFR Interventions largely focuses on building capacities for environmental risk and Operational Health and safety (OHS) management in non-farm and emerging sector jobs and also enhancing overall environmental awareness of women beneficiaries - The Tamil Nadu state Climate Change action plan and state rules/policies on Sustainable Solid waste management (for operations in emerging sectors) like Tamil Nadu Solid Waste Management Rules, 2016, The Tamil Nadu Water (P&Cp) Rules, 1983 (Prevention and Control of Pollution), E-Waste Policy of Tamil Nadu 2010 and Tamil Nadu Operational, Health and Working Condition Rules, 2022 becomes extremely relevant and applicable.
48. The PFR investments are expected to include refurbishments in select working women hostels and creche facilities (mostly restricted to provision of equipment, strengthening systems) – The Tamil Nadu Combined Development and Building Rules, 2019, Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014 and Tamil Nadu Hostels and Homes for Women and Children (Regulation) Rules, 2015 is found to be relevant and sufficient for optimum environment risk management. The Tamil Nadu Hostels and Homes for Women and Children (Regulation) Rules, 2015 also provide recommendations on provision of vocational and Socio-cultural recreational facilities in working women hostels and also endorses inclusion of eco-friendly programmes in working of such establishments.
49. The ESSA assessments find existing regulatory ecosystem at national and state level robust enough to manage potential environmental risks arising from the current PFR interventions. Although robust in coverage and content, the applicable laws and rules require strong handholding and support for on ground implementation which is a gap observed during the ESSA

preparation process and would be supported under this PFR through various proposed capacity building initiatives under the operation.

50. **Social:** In terms of inclusion, public policy and practice builds upon the Constitutional provisions recognizing various indigenous groups, in particular Scheduled Castes and Scheduled Tribes. This is supported by Acts like The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 and Rules, 1995 and The Rights of Persons with Disabilities (PWD) Act, 2016. Further, in order to promote a safe environment for women in the workforce, statutes like the Sexual Harassment of Women at Workplace Prevention, Prohibition, and Redressal Act 2013 have strong provisions like requirements to establish Internal Complaints Committees which ensure that systems are prepared and responsive to handle SEA/SH situations. Further, in the context of civil works, the legal framework for management of labour and land acquisition is also well established at the national level. States also have their supporting Rules for the same. Transparency and accountability are also legally ensured through the Right to Information Act, 2005, which Provides a practical regime of right to information for citizens to secure access to information under the control of Public Authorities. The Act sets out the obligations of public authorities with respect to provision of information, requires designating of a Public Information Officer, and lays down the process for any citizen to obtain information/disposal of request.
51. In addition to the national laws, there is a framework of State Rules which operationalize these Acts. There are also some state-specific statutes like the Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014 which lay down guidelines for operation of hostels like the working women's hostels under the Social Welfare Department, which would be refurbished under the project.
52. The Policy framework for this program is largely situated within the contours of the Tamil Nadu New State Policy for Women 2021, the Tamil Nadu Startup and Innovation Policy 2023 and the Micro, Small and Medium Enterprises Policy, Tamil Nadu, 2021. These policies set out a strong vision for promotion of women's employment and entrepreneurship.
53. As with most legislative frameworks, the laws require the support of robust implementation which is a critical gap and would require support under capacity building initiatives of the operation.
54. Detail assessments of all relevant legal instruments and applicability to this PFR is included in Annexure B.

## 6. Environmental and Social Risks, Screening, potential Benefits and Opportunities

### 6.1 Risk screening and Assessment

#### Environment

55. Based on the findings of the secondary literature review, proposed program interventions, local context and existing systems and nature and scale of anticipated impacts, a risk category of 'low' has been assigned to this program. The screening reveals that the Program will not have any significant or irreversible environmental impacts, and the temporary and minor environmental impacts can be easily managed through application of existing regulatory ecosystem, provision and implementation of timely mitigation measures and relevant capacity strengthening for environmental management. The screening also ensured that the Program does not include activities which are ineligible for financing using the PforR instrument.

The most prevalent environmental issues expected during/due to program interventions can be related to; (i) Temporary construction (during refurbishment and O&M activities if any) related impacts – dust, noise, air and water pollution, construction and demolition waste disposal during minor civil works (like renovation and refurbishment of existing hostel facilities); (ii) Operational, Health and Safety for workers involved in minor civil and upgradation works (in existing facilities like – working women hostels, incubation center, care facilities , livelihood promotion centers); (iii) disposal of increased waste (e-waste, textile waste, C&D waste, other hazardous waste) due to procurement of IT equipment under the program; (iii) occupational health and safety of workers employed in refurbishment and O&M works; (iv) increased and unsustainable resource consumption (energy, water, improper waste disposal) in facilities like child and elderly care centers (care economy).

#### Social

56. Using the findings of the secondary literature, the ESSA team carried out the social risk screening. This screening considered the likely risks arising from social impacts, contextual risks, institutional capacity and complexity risks, and political and reputational risks. In addition, specifically, issues relating to GRMs, community relationship/satisfaction, stakeholder engagement, gender, and labour were considered. The screening revealed that the Program will not have any significant adverse social impacts. The prevalent social risks related to i) risk of exclusion for disadvantaged and vulnerable groups; ii) inter and intra-district variations in management of E&S risks; iii) fragmented grievance redressal mechanisms, including grievances related to Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH)/GBV (Gender-based violence); iv) SEA/SH risks for female trainees and beneficiaries due to potential interface with various stakeholders, workers and staff involved in program activities; and v) other social risks arising out of deficiencies in planning, implementation and monitoring of stakeholder and community engagement.
57. The social impacts arising from the civil works to be done such as that involved in the upgrading of women's hostels would be minor and reversible. The potential social risks would be in relation to labour employed on the project, lack of compliance with applicable labour laws and risks arising

out of labour influx. Overall, the findings from the screening exercise indicated that the **social risk** is ‘moderate.’

The screening also ensured that the Program does not include activities which are ineligible for financing using the PforR instrument. Based on the information available, the following were confirmed: (a) No land acquisition and/or resettlement to be undertaken; (b) No construction where private land acquisition is required or any land for which clear title or any recognizable claim is not available with the government; (c) No activities that involve the use of forced or child labor; (d) No marginalization of, or conflict within or among, social groups; or (e) No activities that would (i) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation or common property resources; or (ii) cause relocation of Indigenous People/ tribal communities or have significant impact on them. A detailed list of E&S exclusions is included in Chapter 10.

## 6.2 Environmental and Social Benefits and Opportunities

### Environment

58. The net environmental impact of the program will be positive. There are many potential environmental benefits and opportunities that the Program will introduce directly and indirectly, including:

- a. Promotion of skills for green jobs in the labor market is likely to influence investments in green activities and thereby help accelerate green economic transformation.
- b. Adoption of eco-friendly approaches in emerging sectors, enhanced environmental consciousness and green skills in women to be employed in emerging and non-farm sectors (garment manufacturing, textile industry, automobiles, digital sectors, Non-leather footwear) and sustainability managed elderly and child care facilities, will bring climate change benefits and contribute towards the state’s plan on climate change mitigation.
- c. Knowledge and awareness generation through skills development & training, capacity building (through inclusion of dedicated Environmental modules and mandatory trainings) and outreach activities is likely to lead to greater environmental consciousness, directly and indirectly, through exposure to multiple channels of information.
- d. Enhanced institutional capacities of various training/coordinating institutions leading to the optimum utilization of existing infrastructure and resources available will minimize environmental impacts resulting from inadequately planned infrastructure.
- e. Reduced reliance on agriculture-based livelihoods will help women who are seeking gainful employment, better manage climate related risks and economic vulnerabilities.

### Social

59. The net social impact of the program will be positive. There are many potential social benefits and opportunities of the Program. Some of the benefits include the following:

- a. Improved access to economic growth opportunities for women belonging to vulnerable and disadvantaged groups (such as Scheduled Tribes (STs), Scheduled Castes (SCs), Persons with Disabilities (PwDs), transgender individuals among others);
- b. Improved awareness and participation from women and other stakeholders leading to enhanced planning capacity at the district-level;
- c. Strengthened functionality and access of the state's grievance redressal mechanism (GRM);
- d. Improved capacity of state systems to manage SEA/SH risks
- e. Improved labour management including improved management of risks related to labour influx;

### 6.3 Environmental and Social Risk and Benefit Analysis of Proposed Investments

S. No	RA	Activity	Environmental Risk Rating and Justification for Rating	Social Risk Rating and Justification for Rating
4	<b>RA 1:</b> <i>EMPLOY: Improved labor market performance for women in emerging sectors</i>	<p><b>Skills development support</b></p> <ul style="list-style-type: none"> <li>● Technical, social, emotional, digital, and financial literacy skills to women</li> <li>● Career support services such as career counselling, internship opportunities, job-search facilities, and placement support</li> <li>● Training in non-farm and emerging sectors</li> <li>● Skills training programs including life skills such as communication, negotiation, logical thinking, language skills, personal safety, and mental health</li> </ul> <p><b>Entrepreneurship support</b></p> <ul style="list-style-type: none"> <li>● Incubation programs for early-stage women-led businesses through state/ regional/ district level incubation facilities</li> </ul>	<p><b>Risk Rating: low</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>● Inclusion of green practices in operations of emerging and non farm sector employment will bring environment conservation benefits.</li> <li>● Increased opportunity for income generation in non-farm based sectors will directly and indirectly reduce dependence on natural resources.</li> <li>● Environmental education: Promoting environmental education in childcare facilities can help instill sustainable practices and awareness in children from a young age.</li> </ul> <p><b>Risks</b></p>	<p><b>Risk Rating: Moderate</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>● Improved access to skill development activities and entrepreneurship support for women from marginalized groups.<sup>51</sup></li> <li>● Increased opportunities in non-farm and emerging sectors for economic inclusion of dropouts and unemployed youth and women.</li> <li>● Development of pathways to overcome structural barriers to access entrepreneurship support for women-led businesses.</li> </ul> <p><b>Risks</b></p>

<sup>51</sup> Some groups that the Government has already identified for targeting of training programs and career support services include members of DSWVE's Industrial Cooperative Societies, those employed in non-farm sectors, women in higher education, women on a career break due to post-partum and personal reasons, vulnerable women such as victims of domestic violence, transgender individuals, sex workers, those in conflict with the law, single mothers, and destitute mothers (PAD)

		<ul style="list-style-type: none"> <li>• Acceleration support services to existing help women-led businesses scale up</li> <li>• Improving access to innovative financing options (co-financing, competitive business proposals, staggered grants, etc.), enable connections with financial institutions, and mobilize fund from private sector</li> </ul>	<ul style="list-style-type: none"> <li>• Construction related pollution and OHS: Potentially adverse environmental impacts of minor civil works construction that could cause localized, site-level pollution and OHS issues.</li> <li>• EHS: Inconsistent application of EHS provisions in civil works contracts or by relevant govt departments may pose worker safety related risks</li> <li>• Waste Management: Unsustainable management of waste (especially e-waste) generated during procurement of digital equipment under the program</li> </ul>	<ul style="list-style-type: none"> <li>• Possible exclusion of vulnerable groups due to lack of information or awareness.</li> <li>• SEA/SH risks for female beneficiaries (including trainees and entrepreneurs) during program activities due to interface with multiple stakeholders, inadequate safety arrangements in training centres, incubation centres, hostels etc.</li> <li>• SEA/SH risks during civil works</li> </ul>
5	<p><b>RA 2:</b>  <b>ENABLE:</b>  <b>Enhanced delivery of enabling services to promote women's employment:</b></p>	<ul style="list-style-type: none"> <li>• Development and approval of Women's Quality Employment Plans (WQEPs)<sup>52</sup> at the district level in selected districts.</li> <li>• Support the development and implementation of a comprehensive communication plan.</li> </ul>	<p><b>Risk rating – Low</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>• Strengthened planning, communications, and outreach to support and enhance women employment opportunities in non-farm and emerging sectors with dedicated</li> </ul>	<p><b>Risk Rating:</b> Moderate</p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>• Improved awareness and participation leading to enhanced planning capacity at the district-level.</li> <li>• Reduced dependence on middlemen/</li> </ul>

<sup>52</sup> WQEP - Women's Quality Employment Plans. Through WQEPs, priority urban-local bodies (ULBs) will develop and implement zone-level safety plans to deliver safe public spaces. The WQEPs will support mapping and strengthening of access to appropriate childcare and elderly care services and facilities. Support will be provided for the creation of a quality framework and the formation of a cadre of trained caregivers in elderly and childcare through ongoing government initiatives. The proposed quality framework will help guide investments in the care economy to (i) expand the basket of care service provisions reflecting local economic situations, and (ii) leveraging private sector partnerships to design and deliver an optimal mix of enabling care services in select economic zones through WEQPs. For example, as option for creating employment opportunities, interested women can be supported to pursue career in childcare and elderly care. The WEQPs will also help prioritize investments in affordable housing options. This will include allocation of cash vouchers and strengthening access to hostel facilities and temporary housing options for migrant and other women workers in and around urban areas (tier II and tier III cities) with focus on vulnerable women. Specialized mobility options for women will also be supported through collaborate with private and public transportation service providers including training and promotion of more women drivers.

		<ul style="list-style-type: none"> <li>Support a helpline system for women on information related to enabling services for employment.</li> <li>Development of customized IEC materials</li> <li>Communication campaign at all levels</li> </ul>	<p>modules/sessions on environmentally positive operations, will increase overall environmental awareness and consciousness in newly employed women and will gradually reduce jobs in/provide alternative livelihoods to natural resource dependent communities/climate vulnerable sectors.</p> <p><b>Risks</b> NA</p>	<p>agents, especially for female entrepreneurs.</p> <ul style="list-style-type: none"> <li>Improved communication and information for women beneficiaries</li> </ul> <p><b>Risks</b></p> <ul style="list-style-type: none"> <li>Lack of adequate consultations with vulnerable and disadvantaged groups to inform the development of WQEPs</li> <li>Communication plan and IEC materials not informed by consultations from relevant stakeholders and inadequate in addressing their requirements</li> </ul>
6	<b>RA 3: EMPOWER: Strengthened state capacities, technical partnerships, and institutional structures for women's employment</b>	<ul style="list-style-type: none"> <li>State-led platform for women's employment anchored within SPID</li> <li>District level platforms to coordinate and promote women employment and entrepreneurship</li> <li>Targeted partnerships and outreach arrangements for training, internships, apprenticeships, and job placements.</li> <li>Capacity building, knowledge sharing, and training of officials on women's economic empowerment and labor market integration.</li> </ul>	<p><b>Risk rating – Low</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Strengthened policy and institutional framework and systems to support and enhance women employment opportunities in non-farm and emerging sectors will increase overall environmental awareness and consciousness</li> <li>The interventions are expected to gradually reduce jobs in climate vulnerable sectors, and will provide alternative livelihoods to natural resource dependent communities</li> </ul>	<p><b>Risk rating - Low</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Improved capacity of state institutions to provide improved services supporting women's employment</li> <li>Improved capacity of state institutions to manage social risks in their internal functioning, designing and implementing interventions</li> <li>Collaborative approach enhancing stakeholder participation</li> </ul> <p><b>Risks</b></p>

		<ul style="list-style-type: none"> <li>Collaborations with established technical institutes<sup>53</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>Institutional, knowledge, outreach and policy support for green jobs and sustainable practices in other emerging sectors will facilitate transition to green economy for Tamil Nadu</li> </ul>	<ul style="list-style-type: none"> <li>Lack of focus on developing capacity on social risk management</li> <li>SEA/SH risks for women officials during the course of trainings and other capacity building initiatives</li> </ul>
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## 7. Institutional Assessment

### 7.1 Institutional Setup

60. This section provides details of the existing institutional setup as well as an assessment of the social and environment management capacity of the current system.
61. **Special Program Implementation Department (SPID):** The SPID has been created exclusively for monitoring and coordinating the implementation of various flagship programs and schemes of the Government. This department closely works with other line departments for achieving sustainable development and balanced growth. The SPID will convene and ensure coordination amongst the priority departments for planning, implementation and monitoring of activities and fund flows. The role of the SPID is key to ensure seamless coordination across stakeholders and empowered leadership. Across critical state-led programs that are priorities for the state's political leadership (e.g. *Naan Mudhalvan* and *Magalir Urimai Thogai* schemes), the SPID also acts as nodal coordinating agencies between line departments. Therefore, SPID's existing role as a 'state coordinator' will be leveraged to deliver the TNWeSafe Program. The SPID collects and records the status of implementation of various Schemes, Programs and Projects that are announced by the Government in coordination with the Line Departments concerned. This Department prepares Progress reports for important coordination meetings and analytical reports for High Level Review Meetings conducted from time to time.
62. **Project Management Unit (PMU)** will be established at the State level and will be housed under SPID. The PMU will be managed by the Project Director (PD) reporting to the Secretary, SPID. PMU will be responsible for the coordination and management of the program in collaboration with the implementing priority nodal institutions. The PMU will provide general oversight, technical support, supervision, M&E, resource management, and allocation. The PMU or the Department currently does not have in-house capacity for E&S risk management and will require technical assistance from the Program to ensure Program investments in follows necessary due diligence and efficient management of E&S impacts.

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<sup>53</sup> NASSCOM (digital inclusion), Indian Institutes of Management (life skills and incubation support for young adults) and private players such as Microsoft (mentorship for young women), Apple (Apple Entrepreneur Camp), Amazon (Amazon Saheli platform for women entrepreneurs), and Flipkart (support through NITI Ayog's Women Entrepreneurship Platform) to mainstream innovative approaches in delivering enabling services through WEQPs. women workers, female students, and women entrepreneurs

63. **State level Program Steering Committee (PSC):** The PSC, chaired by Development Commissioner will be established for TNWeSafe. The PSC members will include the Secretaries of Finance Department, SPID, SWWED, MSMED, MD of TNSDC and heads of other relevant institutions. The PSC will provide oversight for state level interventions and will ensure inter-departmental coordination. It will meet annually to: (i) review progress in the achievement of the overall project objective and guide project implementation; (ii) approve the annual action plan as well as provide financial and administrative approvals for the activities to be undertaken within the Program; (iii) ensure smooth inter-departmental coordination to aid implementation; and (iv) provide strategic policy advice and orientation.
64. **Tamil Nadu Skills Development Corporation (TNSDC):** TNSDC is a Section 8 Company headed by a Board of Directors. The Managing Director, TNSDC is the Executive Head assisted by Departmental heads, followed by Project Directors and the team. At the district level, Assistant Directors and District Skill Training Officers are implementing the programs as part of District Skill Committees headed by District Collectors. Tamil Nadu Skill Development Corporation was formed with a vision to transform the state into skill hub by skilling the youth to enhance their employability and match the expectations of the industry. Since 2013 it is functioning as a Corporation under the Special Programme Implementation Department. TNSDC has been declared as the State Nodal Agency for Skill Development by the Government.<sup>54</sup>
65. TNSDC works through Training Partners, who are certified by the Sector Skill Council (SSC) which is a national certification awarding body affiliated to the National Skill Development Corporation. TNSDC has also recently been recognized as a Dual body (Awarding and Assessing) by the National Council for Vocational Education and Training. It would now be able to certify training partners and design training curriculum. TNSDC has established a State Level Apex Committee and a District Level Committee to evaluate the proposals submitted by the skill training partners to the TNSDC. They are also empowered to monitor the performance of the institutions. The training and skilling courses under the TNSDC range from 1 months to 8 months in duration with a combination of classroom and on-the-job training. Training centres have biometric attendance systems and monitoring by CCTV. There are extensive guidelines on assessing the performance of training partners particularly through data on enrollment and attendance, successful completion of training and placement. They also have special training programs targeted at women beneficiaries as well as other disadvantaged groups.
66. There is a comprehensive monitoring system wherein the Assistant Director Skill Development and Program Manager at district level conduct surprise inspections at least 3 times during a batch. Any deficiencies identified have to be corrected in order for the training centre to receive the payment under that particular tranche. However, from consultations it is understood that staffing for monitoring, particularly at the district level is a challenge. TNSDC does not have any dedicated staff for environmental or social risk management. TNSDC has an ICC to comply with the requirements of the POSH Act.
67. **Environment Management in TNSDC:** The Tamil Nadu Skills Development Corporation (TNSDC) is primarily focused on skill development and training programs in Tamil Nadu. While there are limited dedicated and active interventions on Environmental Management capacity development, it is important to note that the organization plays a crucial role in promoting sustainable

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<sup>54</sup> <https://www.tnskill.tn.gov.in/>

development and green jobs in the state. TNSDC collaborates with various training institutions and organizations for capacity-building activities with an aim to equip the staff with the necessary skills and knowledge to address environmental concerns in their projects and programs.

68. The green job promotion initiatives under TNSDC are working actively in select sectors and this initiative recognizes the need for mainstreaming environmental sustainability in emerging-sector jobs. The organization has already started incorporating “greening” approaches in many of their ongoing training programs for employable youth. Capacity building courses in solar technology<sup>55</sup> are being taken up especially related to Solar PV Designs, Solar PV Installation (electrical) and Solar PV Installer (Surya Mitra). Chennai and Ranipet Districts has green skill training providers in renewable energy sector in Tamil Nadu specifically on solar technology. In Nan Mudhalvan Scheme - the Upskilling Platform for industry relevant skill enhancement initiatives for the Youth of Tamil Nadu, there are courses on Electric Vehicle operations. By equipping individuals with skills related to green technologies, renewable energy, TNSDC has initiated contributions to the promotion of green jobs in Tamil Nadu. The above examples demonstrate TNSDC's efforts to incorporate environmental considerations into its activities.
69. **Social Welfare and Women Empowerment Department - SWWED (Commissionerate of Social Welfare):** The Government of Tamil Nadu, through the Commissionerate Social Welfare has implemented various schemes focused on uplifting women and children (particularly girls) in the State. The State is implementing schemes for achieving equality and empowerment of women and girls in the State. The schemes address a multitude of aspects necessary for uplifting women and girls. Some of the flagship programs of the Tamil Nadu Government are Girl Child Protection Scheme, Higher Education Assurance Scheme and Avvaiyar Award for exemplary service rendered by women. Further, the Tamil Nadu Government provides financial assistance to voluntary organizations in the State to undertake rehabilitation and welfare services for women and run family counselling centres. The CSW also manages working women's hostels in the state. As part of this project, it plans to undertake minor refurbishment of select hostels to improve their facilities.
70. The institutional structure within the SWWED, specifically the Commissionerate of Social Welfare, responsible for implementing welfare schemes and enforcing social legislations to protect and support marginalized groups such as women, children, transgender individuals, and senior citizens, is organized as follows: At the State Level: The Commissioner is the head at the state level, responsible for overseeing and leading the Commissionerate of Social Welfare. There are two Additional Directors who work alongside the Commissioner to manage and administer various aspects of the programs and initiatives. The Commissionerate is divided into several sections, each dedicated to specific programs and initiatives, including Chief Minister Breakfast Scheme, Nutritious Noon Meal Program, Child Welfare, Women Welfare, Senior Citizen Welfare/Grants/Special Programs. Each section is led by a Joint Director, responsible for the management and supervision of their respective areas. Deputy Directors and Assistant Directors assist the Joint Directors in the implementation and execution of programs. There is a team (Superintendent, Assistant, Junior Assistant and Typist) that supports the Joint Directors, Deputy Directors, and Assistant Directors in carrying out their responsibilities. At the district level, the District Social Welfare Officer is responsible for overseeing and coordinating all programs and schemes of the Commissionerate within their respective district. The District Social Welfare

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<sup>55</sup> <https://www.cag.org.in/sites/default/files/database/11.pdf>

Officer is supported by a team of officers and staff who assist in the implementation and management of programs and initiatives within the district.

71. Currently the department addresses issues such as malnutrition, education, and empowerment, the DSWWED indirectly contributes to creating a sustainable and environmentally conscious society through capacity building, creation and strengthening of Community Based Organisations and Self Help Groups. The Department does not have in-house capacity or dedicated staff for Environment risk management and will require capacity strengthening from the current PforR, to ensure the relevant schemes integrate environment considerations during implementation where required and follow necessary due diligence and M&E for efficient management of any adverse impacts. The Department has an ICC to comply with the requirements of the POSH Act.
72. ***Environment Management in TNSDC*** - During ESSA preparation consultations were held with college students who are benefitting from Naan Mudhalvan scheme's courses by the TNSDC. These upskilling courses are integrated into their degree programs and includes topics like EV battery management, port logistics, python and data analytics. As part of the program, every six months, consultation is done with industry partners to ascertain the current needs of the market, and hence the courses are usually updated as per the market needs and latest application-based knowledge. As per the interactions with the department and the filled questionnaires, there is limited scope to include environmental considerations in the ongoing schemes and programs. The department does include certain elements of environmental considerations in its various programs and trainings but does not have a formal environment risk management system or protocol in place. Some trainings are also directly/indirectly related to development of green skills for emerging sector jobs.
73. ***Micro Small and Medium Enterprises Department (MSMED)***: The MSMED department, at the national level, aims to enhance the competitiveness of micro, small, and medium enterprises (MSMEs) in the changed economic scenario. It seeks to provide support for technology upgradation, modernization, integrated infrastructural facilities, access to modern management practices, entrepreneurship development, and skill upgradation through training facilities. These initiatives indirectly contribute to promoting environmental sustainability by encouraging MSMEs to adopt sustainable practices and technologies. The State Level office of the MSME Department is headed by Industries Commissioner and Director of Industries & Commerce. Each district has a District Industries Centre (DIC) headed by a General Manager.
74. ***Environment Management in MSMED***: Micro Small and Medium Enterprises Department (MSMED) of Tamil Nadu<sup>56</sup> recognizes the importance of environmental sustainability and the Tamil Nadu MSME Policy suitably incorporates environmental considerations into its policy objectives. Objectives related to Environment sustainability in MSME policy include: 1. Promote and facilitate green initiatives and sustainable waste management; 2. Reinforce social equity and inclusion; 3. Build capacity and resilience of MSMEs to tide over business cycles and natural disasters; 4. Create quality consciousness and encourage certification; 5. Strengthen the supporting legal framework. The TN MSME Policy specifically mentions designing an MSME Manufacturing Competitiveness & Sustainability Initiative (MC&SI) to incentivize resource efficiency, environmental sustainability, and adoption of international product/process quality standards; Incentivizing green initiatives by the adoption of cleaner and environment-friendly

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<sup>56</sup> [https://cms.tn.gov.in/sites/default/files/documents/MSME\\_Policy\\_2021\\_0.pdf](https://cms.tn.gov.in/sites/default/files/documents/MSME_Policy_2021_0.pdf)

technologies (for all new and existing micro, small and medium manufacturing enterprises ) for efficient usage of resources and waste management including electronic waste; and Supporting MSME cluster associations and Tamil Nadu Small Industries Development Corporation Limited (TANSIDCO) industrial estates to set up common facility centres, modern tool rooms, quality testing labs, environment management infrastructure etc., through Special Purpose Vehicles (SPVs).

75. Additionally, the MSMED department acknowledges the significance of environmental compliance and regulatory measures. The Government of Tamil Nadu has introduced Promotion of Energy Audit and Conservation of Energy (PEACE)<sup>57</sup> scheme for promoting Energy efficiency in MSME units. Main objective of the scheme is to identify the major sources of energy in use, identifying the lapses in energy usage, identifying areas to improve energy usage, determining the level of consumption of the energy sources and recommending measures that will enhance energy savings in the industry. The PEACE scheme aims to promote energy efficiency in MSME units so as to enable them to reduce costs and improve competitiveness in the global markets. Under this scheme, the Government will reimburse 75% of the cost of conducting energy audit subject to a ceiling of Rs.1.00 lakh per energy audit per unit. As an incentive for implementing the recommendations of the energy audit, 50% of the cost of machinery and equipment replaced, retrofitting and technology acquired for the purpose of improving the energy efficiency subject to a maximum of Rs.10 lakh is reimbursed.
76. The department also conducts assessments to evaluate the level of environmental regulatory compliance among MSME units and their track record on compliance. This indicates a focus on ensuring that MSMEs adhere to environmental regulations and promote environmental responsibility through very relevant schemes like PEACE. By promoting technology upgradation, entrepreneurship development, and compliance with environmental regulations, the department contributes to fostering sustainable practices among MSMEs in Tamil Nadu.
77. Additionally, the MSMED department collaborates with various stakeholders, including government officials, industry associations, non-governmental organizations, civil society organizations, and MSME associations, to assess the level of environmental regulatory compliance and learn new and green technologies for various MSME operations. This indicates a focus on ensuring that MSMEs adhere to environmental regulations and promote environmental responsibility.
78. **Commissionerate of Industries and Commerce** - They provide support services to the entrepreneurs towards identification of viable activities and preparation of project profiles for assistance from financial institutions/banks. They also organize and conduct Entrepreneurship and Skill Training Programmes. Additionally, they help create awareness about the policies and programmes on industrial development of the State / Union Governments, through awareness camps, seminars and dissemination meets. They are also responsible for sanction and disbursement of incentives and subsidies to MSMEs, as per MSME Policy of GoTN<sup>58</sup>. The key schemes under the Commissionerate of Industries and Commerce include the Unemployed Youth Employment Generation Programme (UYEGP), Anna Ambedkar Business Championship Scheme (AABCS), and New Entrepreneur cum Enterprise Development Scheme (NEEDS).

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<sup>57</sup> [https://msmeonline.tn.gov.in/incentives/html\\_cye\\_peace1.php](https://msmeonline.tn.gov.in/incentives/html_cye_peace1.php)

<sup>58</sup> <https://www.msmtamilnadu.tn.gov.in/about-commissionerate.php>

79. ***Environment Management in Commissionerate of Industries and Commerce:*** The Commissionerate focusses on promoting sustainable industrial practices, pollution control, and compliance through enforcement of existing environmental regulations. This could involve implementing measures to reduce industrial pollution, encouraging industries to adopt cleaner technologies, and ensuring adherence to environmental standards. Under the department's Scheme for Reimbursement of Charges for Quality Certification, the MSMEs are encouraged to acquire quality standards/certifications<sup>59</sup> for process and product, such as ISO 9000/ISO 14001/ISO 22000/Hazard Analysis and Critical Control Point (HACCP)/ Good Hygienic Practices (GHP) / Good Manufacturing Practices (GMP) Certifications, BIS Certification, Zero Defect and Zero Effect (ZED) Rating or any other international quality certification recognized in India by a competent authority. The government reimburses payments made to Consultancy and certification agencies towards acquiring such Quality Certification subject to a ceiling of Rs.2.00 lakhs for National level certification and Rs.10.00 lakhs for International level Certification. As per the received information, during the financial year 2020-21, a sum of Rs.60.35 lakhs have been disbursed to 92 MSMEs in the State. The Commissionerate also actively works with the PEACE scheme, which aims to promote energy efficiency in MSME units to enable them to reduce costs and improve competitiveness in the global markets. Although the Commissionerate does not have a dedicated team/staff to monitor Environment Management in its services, it does ensure promoting sustainable industrial practices, pollution control, and compliance with relevant environmental regulations and adherence to environmental standards in its establishments/operations.
80. **Tamil Nadu Startup and Innovation Mission (TANSIM) / Startup TN -** Tamil Nadu Startup and Innovation Mission (TANSIM) was started with the aim of providing an enabling and innovative ecosystem in the State. The main activities of TANSIM are nurturing innovation, promoting investments in R&D, infrastructure support, knowledge creation, technological development and skilled manpower, resulting in high growth entrepreneurial ventures across the spectrum of sectors from agriculture, manufacturing, healthcare, education, logistics, social sector, urban development, environment, to Fintech and ICT. It undertakes various initiatives to nurture and support startups in the state<sup>60</sup>. As the nodal startup agency of the state, Startup TN's reach extends throughout the state with particular focus on Tier II & Tier III regions, where the students and aspirants do not have access to the requisite opportunities, resources, and support. They also have an emphasis on inclusiveness<sup>61</sup>. Startup TN has a strong inclusionary focus. It recognizes the importance of providing particular attention to women entrepreneurs.
81. In spite of Tamil Nadu having the maximum number of women entrepreneur-owned enterprises, including nano, micro, small and medium businesses (10.87 lakhs) as well as being in the first place in women entrepreneurship with 13.51 percent of its women population in entrepreneurship, the number of women in the startup space is disproportionately low<sup>62</sup>. To address this gap, certain special packages of assistance are targeted at women entrepreneurs. Under the TANSEED Scheme of Startup TN, the assistance for eligible women-led startups is enhanced to INR 15 lakh (from INR 10 lakh). 25% of the total TANSEED assistance is also earmarked for women-led startups under

<sup>59</sup> <https://www.msmtamilnadu.tn.gov.in/q-cert.php>

<sup>60</sup> <https://www.msmtamilnadu.tn.gov.in/tansim.php#chart-line>

<sup>61</sup> <https://startuptn.in/about/>

<sup>62</sup> Based on discussions with the agency and information shared by them

TANSEED 6.0. Additionally, exclusive co-working spaces for women-led startups shall be made available in state supported incubation centres and incubation centres of State funded Universities through issuance of incubation vouchers. These facilities shall be made available with rent and membership free of cost for the first year subject to a maximum subsidy of INR 2 lakh for women-led startups. Startup TN shall also implement a Special Entrepreneurship Training Program for aspiring and existing women-led startups with EDII. This year, Startup TN has also rolled out a 4-day course on Business English for women entrepreneurs in partnership with the US Embassy in Chennai. A special Women Mentorship Programme with special Women Cohort sessions were also conducted by Startup TN for women-led startups inviting women who have run businesses or were employed as top executives to mentor women-led startups and aspirants. An exclusive acceleration program is planned to be conducted annually for women-led startups and FemTech Startups. Additionally, focused angel investor circles is also planned to be created for women-led startups under the Tamil Angels platform. Women-led startups shall also be eligible for the Matching Grant Programme (MGP) under the ‘Vaazhndhu Kaattuvom Project’ of the Department of Rural Development and Panchayai Raj<sup>63</sup>. As per data shared in February 2024, TANSEED has funded 51 women-led startups out of 132 total startups in its five editions since 2021. Startup TN has also formed the ICC under POSH Act and the first ICC meeting is planned in February 2024.

82. Additionally, Startup TN also has a Tamil Nadu Scheduled Caste / Scheduled Tribe Startup Fund, which aims to address the issue of financial exclusion of SC/ST entrepreneurs. The objective of the fund is to invest in startups founded by entrepreneurs exclusively from the Scheduled Caste / Scheduled Tribe communities. As of February 2024, 24 SC/ST led startups are in Startup TN’s portfolio.
83. Startup TN also conducts a number of programs and awareness sessions among startups. For instance, in the last year they organized Break the Barrier programs where they got startup successes to speak, mentors, technical experts etc. They also ran another program called ‘Playing Pitch’ Aadu Kalam to help startups present to funders, not to seek funding but to improve their pitches. Additionally, they partner with various training partners and actively disseminate information on regarding the startup ecosystem with companies.
84. ***Environment Management in StartupTN / TANSIM:*** Tamil Nadu Startup and Innovation Mission (TANSIM) / Startup TN recognizes the importance of environmental sustainability and promotes initiatives that aim to integrate environmental considerations into the startup ecosystem. TANSIM aims to foster innovation and entrepreneurship in Tamil Nadu, which indirectly contributes to sustainable development. By supporting startups and promoting innovation, TANSIM encourages the development of new technologies and solutions that can address environmental challenges and promote sustainable practices.
85. Tamil Nadu Startup and Innovation Mission (TANSIM) provides support to many start-up ecosystems by supporting Incubators which has helped create a steady stream for new innovative ideas and startups. The ESSA Consultations included interaction with Crescent Innovation and Incubation Council, in the Crescent Institute of Science and Technology at Chennai. The consultations confirmed that the existing incubator centers are currently focusing on a few green sectors like life science startups (bio-energy, bio-pharma, bio-services, bio-industrial), and Clean

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<sup>63</sup> GO (Ms) No. 87 dated 26.12.22

mobility (drone technology, smart and non-fossil fuel vehicles, EV, EV battery management and autonomous navigation). The incubator center acts as a one-stop-shop for startups that facilitates entrepreneurial and innovative ecosystem for all stakeholders. The incubator also prioritizes ESG concerns and supports implementing good ESG practices among incubate companies. They are responding to market forces and a strong push from the investing community. It was observed during the consultations that there is a lack of clarity reported among the startup community on appropriate ESG guidelines, especially since there is a lot of variation in requirements depending on the product.

86. At the district level the project team, which will include officers on deputation from SWWED, MSME and TNSDC as well as contractual staff, will report to the District Collector. The district team will also work in close coordination with Assistance Project Offices (APO) from the National Urban Livelihood Mission.

## 7.2 Schemes Supported under the Project

87. **Naan Mudhalvan:** This Scheme, under the Tamil Nadu Skills Development Corporation provides free employment linked skill development trainings to youth across the state under the various state and centrally sponsored schemes. The scheme beneficiaries are all students studying at government or government-aided colleges (other than medical colleges). The trainings are integrated into the undergraduate course and account for two credits. These nationally certified trainings are provided through empaneled training partners at centres in urban and rural areas across the state in over 20 different sectors like healthcare, media and entertainment, green jobs, retail, beauty, construction, electronics and hardware, food processing, health care, IT ITES, leather, logistics etc. This scheme is primarily aimed at skilling in campuses. Under this scheme, consultations are conducted every six months with industry representatives to ascertain the industry demand and ensure that the courses offered to students are responsive to the market needs.
88. **Short Term Skills Training:** TNSDC is the nodal agency for imparting skill related training to unemployed youth and aims to catalyze the skill development eco-system in the State. It actively collaborates with Government Agencies, reputed private skill training institutions and industry partners to impart industry oriented and placement linked skill training. All training partners are registered and certified by the Sector Skill Council (SSC). Candidates can register in TNSDC portal for free training offered by the TNSDC. They can view all course details available, including course duration and the syllabus adopted and apply through the portal. TNSDC also has a dashboard for number of candidates registered, enrolled and their assessments.
89. **Pudhumai Penn:** The GoTN launched the Moovalur Ramamirtham Ammaiyan Higher Education Assurance Scheme scheme to enhance the enrolment ratio of girls from Government schools to higher education institutions. This scheme is designed to bridge the gender gap in higher education and is administered by the Social Welfare Department. Through this scheme, financial assistance of INR 1000 per month will be provided to girl students who have studied in Government schools from standard 6-12 and are currently pursuing their higher education – graduation, ITI, diploma or equivalent institutions situated in Tamil Nadu. This amount is disbursed directly to their bank account. Institutions appoint a Nodal Officer who is responsible for identifying and registering eligible students on the portal.

90. **Unemployed Youth Employment Generation Programme (UYEGP):** This is a flagship Scheme of the MSME Department (Commissionerate of Industries and Commerce) which assists economically and socially weaker sections of society in obtaining loans from commercial banks for starting a manufacturing, services or business enterprise up to a maximum project cost of INR 15 lakhs. The state subsidy is 25%, and the promoter's contribution is 5-10% (special - general category). The scheme is open for applicants between 18-45 years of age with an age relaxation up to 55 years for special categories which includes women, minorities, SC, ST, differently abled and transgender persons. The eligibility criteria include family's income to be under INR 5 lakh per annum.
91. **Annal Ambedkar Business Championship Scheme:** This scheme of the MSME Department (Commissionerate of Industries and Commerce) particularly targets members of the Scheduled Caste and Scheduled Tribe communities to avail entrepreneurship related subsidies. The scheme will provide a 35% capital subsidy and offer a 6% interest subvention for loans to procure machinery and equipment. The scheme would support both, new and old business enterprises in the areas of manufacturing and services. Trading related projects above the threshold of the UYEGP would also be eligible. Entrepreneurship Development Training will be given to all beneficiaries by Entrepreneurship Development and Innovation Institute. There is an age limit of 55 years for this scheme.
92. **NEEDS (New Entrepreneur cum Enterprise Development Scheme):** This Scheme of the MSME Department (Commissionerate of Industries and Commerce) is targeted specifically at the first entrepreneurial projects of first-generation entrepreneurs. Applicants must be between 21 and 45 years of age with an age relaxation up to 55 years for special categories which includes women, minorities, SC, ST, differently abled and transgender persons. This scheme assists beneficiaries in obtaining loans from commercial banks for starting a manufacturing or service project costing between INR 10 lakhs and 5 crores. The capital subsidy is 25% of the project cost and promoter's contribution is 5-10% (special - general category). Entrepreneurship Development Training will also be given to all beneficiaries by Entrepreneurship Development and Innovation Institute.

## 8. Procedures and Practices for Environmental and Social Risk Management

### 8.1 Procedures and Practices for Environmental Risk Management

93. The following section contains an assessment of the prevalent practices across key environmental thematic areas in different implementing agencies under the current PFR.

- a. **Greening of Jobs (non-farm and emerging sectors):** The Implementing agencies under the WeSafe program are actively contributing to greening of jobs in Tamil Nadu. TANSIM and TN Startup fosters innovative solutions for greening of jobs and developing new and relevant technological solutions. One of the most important contributions of TANSIM, also relevant to the current program, is the support being provided to the network of incubators which are often also one stop solution for supporting employment and entrepreneurship opportunities in green sectors. Although consultations revealed that more clarity is required in mainstreaming ESG principles in incubators' training material, currently TANSIM is actively supporting greening of new sector jobs and entrepreneurship opportunities.
- b. **Pollution management and OHS during refurbishments works:** As per the Government Order G.O. (Ms.) No.5, WeSAFE related interventions will be well aligned with required government procedures/clearances, stipulated PWD requirements and national and state guidelines prescribed for such construction activities. These guidelines should ideally integrate EHS aspects on for worker safety (TN Has a robust Tamil Nadu Operational, Health and Working Condition Rules, 2022 ) into the Departments Manual. However, given that a clear environmental screening and risk management process for small scale civil works with low to moderate impacts do not exists, site specific EHS issues are generally not complied with and are not adequately monitored. This gap will need to be covered through regular monitoring and compliance reporting under the current WeSAFE Program.
- c. **Capacity Building and Training for mainstreaming environment risk management in IAs:** TNSDC is actively working on various capacity building programs for promoting jobs for the employable youths of the state. As detailed out in section 6.1 of this ESSA report, various training activities are being conducted to develop skills for increased employment opportunities including select green sectors. Although modules dedicated on environmental sustainability are currently not mainstreamed in various training curriculums, trainings on energy sector (solar/Electric vehicle) are now being provided in select districts depending on market demand. With a dedicated TN MSME policy laying emphasis on environmental considerations, MSMED also works extensively on environmental compliance and certifications. Schemes like PEACE are promoting energy efficiency in startup ecosystems.
- d. **Environment sustainability in operations of working women hostels:** The WeSafe program will work on improving enabling services and increase access to childcare, elderly care, hostel services and other facilities to enhance women's workforce participation. The aspect of environment management in related refurbishment works and incorporation of green practices in operation of such facilities will remains an area of intervention for the current PFR. Not only the management of pollution and OHS issues during the O&M works or

refurbishment works will be a potential environment concern, but the project also provides an opportunity to mainstream green practices, voluntary eco-programs and sustainable waste management initiatives in the operation of these hostels.

## 8.2 Procedures and Practices for Social Risk Management

The following section contains an assessment of the prevalent practices across key social thematic areas:

94. **Grievance Redressal Mechanisms:** Tamil Nadu has a state-wide Integrated and Inclusive Public Grievance CM Helpline Management System (IIPGCMS). Members of the public can submit grievances related to availing government schemes or services that they are eligible for, civic and other public issues. Grievances can be submitted through a mobile application, helpline (1100), email, web portal, post, twitter and facebook. The grievances are forwarded to the concerned departments, each of which have their own Service Level Agreements (SLA) which provides a timeline for the grievance redressal process<sup>64</sup>. As on 25.11.23, 5011 grievances were pending in the state with 18.11 percent of pendency in grievances received during 1.1.23 to 25.11.23.<sup>65</sup> Between 2017 and 2022, 114870 grievances pertaining to Tamil Nadu were received of which 110655 were disposed<sup>66</sup>. The various departments, including all implementing departments have a designated person to respond to grievances received from this cell.
95. As per national guidelines, the state also has a 24X7 women's helpline, which is intended to provide 24 hours immediate and emergency response to women affected by violence through referral (linking with appropriate authority As Police, OSC, Hospitals etc.) and information about women related government schemes programs across the country through a single uniform number. Women Helpline (WHL) was established in Tamil Nadu (short code 181) in December 2018 to provide integrated support and assistance to women affected by violence, both in private and public spaces under one roof. Women Helpline also provides Guidance and counseling services to needy women for supporting women in distress, facing violence or threat of violence, both in private and public spaces, within the family, community and at the workplace. Between 2018 and 2021, the WHL received a total of 4,59,667 calls<sup>67</sup>.
96. All the implementing agencies have their grievance redressal mechanisms where complaints are registered and recorded through the portal or a phone number. For instance, the Additional Director (Administration) at the Commissionerate of Social Welfare is responsible for handling grievances raised by employees within the Commissionerate. Some schemes, like the Pudhumai Penn Scheme also have special officers designated to respond to grievances. Various schemes and initiatives have separate portals, apps, or contact numbers for registering and addressing grievances, including the Chief Minister Breakfast Scheme, the Senior Citizen app, the Transgender Welfare Board, Working Women Hostel, and the Women Helpline. Safety Measures: Safety Box and One Stop Centre (SAKHI) are introduced to ensure the safety of women in workplaces and provide integrated support to women affected by violence, respectively. Similarly,

<sup>64</sup> [https://cmhelpline.tnega.org/portal/en/kb/articles/tamil-nadu-cm-helpline-faqs#1\\_What\\_is\\_the\\_purpose\\_and\\_objectives\\_of\\_Integrated\\_and\\_Inclusive\\_Public\\_Grievance\\_CM\\_Helpline\\_Management\\_System\\_IIPGCMS](https://cmhelpline.tnega.org/portal/en/kb/articles/tamil-nadu-cm-helpline-faqs#1_What_is_the_purpose_and_objectives_of_Integrated_and_Inclusive_Public_Grievance_CM_Helpline_Management_System_IIPGCMS)

<sup>65</sup> <https://sansad.in/getFile/loksabhaquestions/annex/1714/AU496.pdf?source=pgals>

<sup>66</sup> <https://sansad.in/getFile/annex/258/AU277.pdf?source=pgars>

<sup>67</sup> <https://tn181whl.org/whl-statistics/>

in the MSMED, aggrieved persons can submit queries which are addressed by a nodal officer. At the district level, grievances are addressed by the General Manager. The TNSDC has created a service desk for both Short Term Training and *Naan Mudhalvan* programs under which the Training Partner and members of the public can register their queries in the service desk using their mobile number and email id. A dedicated team in *Naan Mudhalvan* is responsible for managing and tracking grievances.

97. Based on the information shared by the agencies and corroboration and observations during the field visits, there are certain gaps in the current system. The critical gaps include: Critical gaps include: (i) Lack of clear and transparent grievance resolution protocols, process, communication process; (ii) Inconsistent formats for maintaining a record of grievances received; (iii) Poor publicity of available GRMs in the offices of the implementing agencies, training centres, colleges, incubators, hostels etc.; (iv) Lack of clearly outlined appeals process; (v) Lack of capacity and knowledge on handling of SEA/SH grievances in the existing GRMs; (vi) Lack of provisions for confidential grievances; and (vii) Lack of monitoring and evaluation protocols of grievances received.
98. **Labour Laws Compliance:** This project is expected to involve minimal civil works such as for renovation and upgradation of working women's hostels, which are likely to be sourced to independent contractors. The implementing department i.e. Social Welfare would undertake the selection of contractor, preparation of DPR and execution and supervision of works, including contractor's compliance to labor laws (including avoidance of child and forced labor, prohibition of bonded labour, minimum wages, provision of accommodation and other facilities, etc.) to the extent required. Standard clauses on labour management would require to be integrated in the contractors' contracts/ bid documents. However, there is currently limited provisioning for site-specific E&S management plans nor are OHS of workers and public safety monitored effectively at the sites.
99. **Management of Sexual Exploitation and Abuse / Sexual Harassment:** In the DSWWE, the Commissionerate has established its Internal Complaints Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The names and contact details of the ICC members are publicly displayed and made accessible to all employees within the organization. Additionally, safety boxes have been introduced in June 2022, and District Social Welfare Officers have been actively organizing awareness programs for government and private offices, advocating for the implementation of safety boxes and the formation of Internal Complaints Committees in all workplaces. Further, District Collectors have been designated as District Officers under Section 5 of the POSH Act through Government order GO. (Ms) No.80 SW & NMP (SW3) Dept, dated 11.11.2016. Each District Collector is responsible for constituting a Local Committee to receive complaints from workplaces with fewer than ten members. This includes the nomination of nodal officers at the taluk or block level in rural areas and at the ward or municipality level in urban areas. The GRM within the DSWWE/DSW is well-equipped to handle complaints related to gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH). It encompasses a range of measures and initiatives, including the handling of sexual harassment cases, the provision of shelter, health, and legal aid for victims, and counselling services. Protection Officers at the local level are appointed to assist victims in filing cases and obtaining remedies, thus ensuring that the GRM can effectively address grievances related to GBV, SEA, and SH. Internal Complaints Committees have also been established in the MSMED at the state level as well as in every office.

100. Based on the information shared and observations made during field visits and consultations, it appears that there is a gap in ensuring widespread publicity of the ICC and POSH requirements. The grievance redressal mechanisms are also not well equipped to handle grievances related to SEA/SH. There is also a need to have trainings and awareness building sessions regarding sexual harassment at the workplace. In particular, these measures have to address the needs of adolescent girls who are particularly vulnerable to the risk of SEA/SH. The present program has the potential to reach out to multiple female beneficiaries, including adolescent girls and it would be critical to address their safety and security risks from a communication standpoint as well as systemic interventions.

101. **Stakeholder Engagement:** The implementing agencies have public interface as part of many of their projects and activities. The DSW engages in stakeholder engagement and communication activities to create awareness and disseminate information about various social legislations and schemes aimed at benefiting women, children, and senior citizens. These activities are typically conducted during specific important days and events, such as Dowry Prohibition Day, Women's Day, Children's Day, National/State Girl Child Protection Day, Elders Abuse Awareness Day, World Elders Day, and Transgender Persons Day. The stakeholders covered in these activities include the general public, especially women, children, senior citizens, and transgender individuals. These engagement activities aim to raise awareness about social legislations and welfare schemes. The Women and Elderly helpline is used to provide information to the public, offering counselling services, and facilitating the rescue of individuals in distress. In addition to regional review meetings (Chief Minister level), Chief Secretary level review meetings and Commissionerate level review meetings, The SWD collects data and feedback from the districts regarding the implementation of various schemes and legislations. This includes reports and information from local authorities and field officers. A monthly report is submitted to the CM Dashboard, which serves as a central data hub for analysis and review. This data-sharing and reporting mechanism enable a comprehensive overview of program progress and issues. Similarly, the TNSDC and MSME conduct various meetings and events with training partners, industry partners and beneficiaries, as required.

102. Based on the information shared by the agencies and observations made during consultations and site visits, stakeholder engagement is currently *ad hoc* and irregular. There is no comprehensive plan for engagement with beneficiaries on a regular basis. There is also lack of a plan to bring together beneficiaries and other interested parties on a regular planned basis for sharing information, receiving feedback and networking, in general. For instance, entrepreneurs engaging with MSME to obtain loans do not have information or access to the investing and startup ecosystem through Startup TN, EDII or other incubators. It would be critical to have more regular and responsive stakeholder engagement which is also recorded so that feedback can flow upwards into program design and implementation and so that beneficiaries can derive maximum gains from the multiple initiatives of the government and others in the field.

103. **Social Inclusion:** The existing schemes include specific provisions for inclusion of vulnerable and disadvantaged groups. Some examples are given below:

- While selecting the candidates for training under STT programs by TNSDC, preference will be given to women, destitute widows, SC/ST, differently abled and transgender persons based on the eligibility.
- Schemes like Pudhumai Penn are targeted specifically at girl students.

- The UYEGP Scheme and NEEDS Scheme offers an age relaxation for applicants belonging to special groups like women, minorities, Scheduled Tribes, Scheduled Castes, disabled and transgender persons.
- The AABC Scheme is specifically targeted at promoting entrepreneurs from Scheduled Castes and Scheduled Tribes.
- StartupTN also has numerous initiatives particularly targeting women-led startups and SC/ST led startups.
- TNSDC has special training programs targeting women beneficiaries.

## 9. Assessment of Borrower's Environmental and Social Management Systems against Core Principles

104. This Chapter provides an analysis of the alignment of the government program's system with core principles of the Bank's Program for Results and includes an assessment of the adequacy and applicability of the existing legislative framework in its coverage of the environmental and social aspects pertaining to program activities. This section presents an assessment of the Borrower systems against the Core Principles.

### CORE PRINCIPLE #1

**Bank Policy:** *Program E&S management systems are designed to (a) promote E&S sustainability in the Program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision-making relating to a Program's E&S effects.*

**Bank Directive:** *Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level. Incorporate recognized elements of environmental and social assessment good practice, including: (i) early screening of potential effects; (ii) consideration of strategic, technical, and site alternatives (including the "no action" alternative); (iii) explicit assessment of potential induced, cumulative, and trans-boundary impacts; (iv) identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized; (v) clear articulation of institutional responsibilities and resources to support implementation of plans; and (vi) Responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures.*

#### A. Applicability

105. Core Principle # 1 is **applicable** to WeSAFE program as several aspects of the Program are relevant to promotion of environmental and social sustainability – (i) The Program may finance civil works to refurbish select facilities like hostels, training centers etc.; and therefore, environmental and social management for avoidance/mitigation of adverse impacts and promotion of participatory decision-making is important. These investments are likely to have small physical footprint with impacts that are expected to be localized, manageable and temporary while requiring site-level mitigation. (ii) The Program will procure considerable amount of IT equipment which needs to be safely disposed if they develop faults or at the end of their lifetime to prevent environmental contamination and public's exposure to hazardous waste. (iii) The program will promote employment in non-farm and emerging sectors. Sectors like textile/Garments, automobiles, digital industries need to be well regulated and built in with environmental sustainability and cultural integrity, in order to avoid undesirable consequences taking place from increased operations (especially in terms of solid, liquid, e-waste management and OHS). (iv) The Program will need to ensure engagement of relevant stakeholders during planning, implementation and monitoring of the activities.

#### B. Systems Assessment

106. Borrower systems have a comprehensive policy, legal and institutional framework that contribute to environmental sustainability. There are laws and regulations concerning

management of environmental and social impacts related to (i) construction within and in proximity of areas such as forests, wildlife habitats and other ecologically sensitive areas, (ii) construction in proximity of cultural heritage sites such as protected monuments, (iii) use of biological resources and the fair and equitable sharing of the benefits arising out of their use and (iv) land and labor related aspects. The EIA notification 2006 mandates a system of environmental clearance for a list of development projects depending on factors such as size, location, and capacity. For building construction, only those that have 20,000 sq.m. and <150,000 sq.m of built-up area require prior environmental clearance from the State Environment Impact Assessment Authority (SEIAA) before any construction work. Since the program will not support any new construction and the proposed civil works only involve upgradation/O&M/refurbishment related works, the EIA regulation will not apply. It is envisaged that all types of civil works supported by the program will be below the radar of the EIA regulation and hence will not undergo a formal environmental clearance process.

107. Tamil Nadu Combined Development and Building Rules (TNCDBR), 2019 (applicable to minor civil works) also includes mandate for Environmental Considerations. The rules include provisions for environmental sustainability, such as the reuse of greywater for groundwater recharge and the inclusion of green building practices. This promotes environmentally friendly construction practices. The upgradation/refurbishment activities under the program will cover basic environmental management of the site as well as occupational safety as per the works manual and PWD requirements/guidelines. However, there are instances of inconsistent application of these provisions resulting from lack of awareness, variations in capacities of onsite officials, monitoring, etc. resulting in site-level issues.
108. The E-Waste (Management) Rules 2016, The Batteries (Management and Handling) Rules, 2020., Plastic Waste Management Rules 2016, Construction and Demolition Waste (Management) Rules 2016, and Solid Waste Management Rules 2016 comprehensively cover waste management issues arising from the implementation of the program. Tamil Nadu E waste Policy 2010, although not legally binding, outlines the state's commitment to minimizing e-waste generation and promoting its responsible management and has a goal to tackle Tamil Nadu's growing E-waste by minimizing generation, maximizing recycling, and protecting the environment. It includes sufficient provisions like 1. Producer responsibility; 2. Need for a Collection network and Public awareness: Educate citizens about responsible E-waste disposal and eco-friendly product; 3. Green recycling: Promote environmentally sound recycling practices and technologies; 4. Skill development: Train individuals and organizations for efficient E-waste management; and 5. Research and innovation: Encourage research on eco-friendly design and advanced recycling methods.
109. Tamil Nadu Operational, Health and Working Condition Rules, 2022 aim to improve worker safety, health, and working conditions in various establishments across the state. These rules apply to all establishments employing ten or more workers, covering a wide range of sectors like manufacturing, mining, food processing, transport, construction, and healthcare. Key Recommendations are on optimum: 1.Working Hours; 2. Safety and Healthy working Environment; 3. Welfare and Working Conditions; 4. Cleanliness and hygiene standards in workplaces; 5. Protection of women workers against sexual harassment; 6. Prohibition of child labor and discrimination in employment and 7. Compliance and Monitoring: Overall, the Tamil Nadu Operational, Health and Working Condition Rules, 2022, represent a significant step towards ensuring safer and healthier working conditions for various industrial sectors in the state.

By addressing various aspects of worker welfare and protection, these rules aim to create a more sustainable and dignified work environment for all.

### C. Gaps and Recommendations

110. Given the scale of construction activity, none of the investments involving civil works will require EIA clearance from the State Environmental Impact Assessment Authority or the State Pollution Control Board, as the scale of these investments are below the recommended thresholds of the EIA and pollution control regulations. The priority departments implementing the project have limited in-house E&S expertise to carry out E&S risk assessment and management. As per the consultations conducted in December 2023, none of the four implementing agencies have any dedicated Environment staff or any established in-house Policy, SoPs or protocols to make their operations environmentally positive.
111. Therefore, the program will be required to undertake environmental and social screening and management, proportionate to the anticipated level of risk for each investment type, via a program specific set of guidelines as a key program action. This will include an E&S Checklist, Environment and Social Codes of Practice and Monitoring formats, which will be integrated into the Program Operations Manual to ensure management of environmental and social impacts in project financed civil works. The checklists will include screening for land, OHS compliance for workers and public, SEA/SH risks etc. Nodal departments will monitor the compliance to these by all implementing agencies/ contracted services/ other entities under them. Also, training & capacity building on environmental and social risk management for each implementing department under WeSAFE will be needed to build in the required expertise to ensure sustainability of Program investments.
112. The PMU housed under the SPID will require a dedicated position for an environmental and social specialist with academic qualifications and work experience in environment and social management.

### CORE PRINCIPLE #2

**Bank Policy:** *Program E&S management systems are designed to avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program. Program activities that involve the significant conversion or degradation of critical natural habitats or critical physical cultural heritage are not eligible for PforR financing.*

**Bank Directive:** *Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas. Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities. Takes into account potential adverse effects on physical cultural property and as warranted, provides adequate measures to avoid, minimize, or mitigate such effects.*

#### A. Applicability

113. Core principle #2 is **not applicable** to WeSAFE in terms of its focus on only minor civil works like hostel refurbishments/O&M Activities and softer interventions like trainings and skill development, communication and outreach and planning and policy support. The provisions in Core Principle 2 where applicable are already considered (as part of E&S screening) in environmental and social management process referenced under Core Principle 1. Activities funded through the Program will not generate adverse impact on natural habitats and physical and cultural resources. The civil works supported by WeSAFE are small scale and will be confined to existing footprints of the selected interventions.

### CORE PRINCIPLE #3

**Bank Policy:** *Program E&S management systems are designed to protect public and worker safety against the potential risks associated with (a) the construction and/or operation of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.*

**Bank Directive:** *(i) Promotes community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed. (ii) Promotes use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; and promotes use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions (iii) Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.*

#### A. Applicability

114. Core Principle 3 is **applicable** to the Program. The civil works include upgradation and refurbishment/O&M activities. This could expose the construction workers as well as the public to temporary risks such as dust, air pollution, noise, solid waste etc. impacting public and workers' safety in these areas. Additionally, for migrant construction workers, provision of basic facilities, including accommodation and medical, needs to be ensured. The planned civil works could also lead to potential SEA/SH risks for local female construction workers and female trainees in case of interface with laborers (both local and migrant). Further, disposal of end-of-life IT equipment procured by WeSAFE could potentially pose a risk of public exposure to hazardous waste if not safely disposed. Increasing employment opportunities in non-farm and emerging sectors via training and skill development would require adequate awareness of OHS issues to ensure occupational safety from potential hazards in respective sectors.

## B. Systems Assessment

115. There are robust government rules and guidelines for ensuring occupation health and worker/public safety. These laws, regulations and guidelines have been integrated into the Works Manual and the General Conditions of Contract of the CPWD and the state PWDs. The Works Manuals of the CPWD and the state PWDs specify procedures for periodic post-construction inspection of buildings for safety. While the state PWDs have adequate provisions for environmental management in construction activities, these are sometimes not adequately and consistently implemented. The national building codes covers environmental aspects such as liquid and solid waste management, fire and life safety, constructional practices and safety, landscaping and water conservation, etc. while the Tamil Nadu Combined Development and Building Rules (TNCDR), 2019 include Compliance with Safety Standards: The rules require adherence to safety standards in construction, such as providing necessary fencing, lights, and first aid facilities on construction sites. This ensures the safety of workers and the public. Additionally, Tamil Nadu Operational, Health and Working Condition Rules, 2022 introduced in April 2022, mandate - improved worker safety, health, and working conditions in various establishments across the state. These rules apply to all establishments employing ten or more workers, covering a wide range of sectors like manufacturing, mining, food processing, transport, construction, and healthcare. Key Recommendations are on optimum: 1. Working Hours; 2. Safety and Healthy working Environment; 3. Welfare and Working Conditions; 4. Cleanliness and hygiene standards in workplaces; 5. Protection of women workers against sexual harassment; 6. Prohibition of child labor and discrimination in employment and 7. Compliance and Monitoring: The rules provide detailed guidelines for specific aspects like first-aid kits, ventilation standards, and personal protective equipment requirements. They emphasize the importance of worker participation in safety committees and risk assessment processes. The rules aim to harmonize with the national Labor Code framework while adding state-specific provisions. The legislative framework hence, provides adequate provisions for ensuring prohibition of child labor and forced labor. Standard clauses on labor management are integrated in the contractors' contracts/ bid documents. However, there is currently limited provisioning for site-specific E&S management plans nor are OHS of workers and public safety monitored effectively at the sites.

## C. Gaps and Recommendations

116. The existing legislative framework is considered adequate in its coverage of OHS aspects pertaining to the program activities: proposed civil works, operation of training institutes and livelihood schools, development of NOSs/QPs and training curriculum for skill development and employment generation in non-farm and emerging sectors. However, there are instances of inconsistent application of these provisions resulting from lack of awareness, variations in capacities of sub-district officials, monitoring, etc. resulting in site-level issues. The physical interventions under the project will be guided by an Environment and Social Framework (including OHS requirements) prepared by PMU-SPID and shall be monitored and reported for compliance and corrective actions by the E&S Staff of the PMU-SPID.

## CORE PRINCIPLE #4

**Bank Policy:** Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.

**Bank Directive:** (i) Avoids or minimizes land acquisition and related adverse impacts; (ii) Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy; (iii) Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access; (iv) Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and (v) Restores or replaces public infrastructure and community services that may be adversely affected.

#### A. Applicability

117. Core principle 4 is **not applicable** as the civil works required are likely to be minor, which may cause some temporary adverse impacts on communities in the process of upgradation or restoration of infrastructure. No new construction or civil works are anticipated, and private land acquisition is not expected for any of the activities planned under the project. The Program would not involve any activities which require private land acquisition or any land for which clear title or a recognizable claim is not available with the government. Any civil works which may be undertaken for upgradation/refurbishment of women's hostels, incubators etc. will be undertaken on government lands free from any encumbrances. There may be minor temporary restrictions on access to community members in case of such civil works which can be mitigated through the implementation of applicable labour laws which would also be present in the bid documents.

### CORE PRINCIPLE #5

**Bank Policy:** Program E&S systems give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to the needs or concerns of vulnerable groups

**Bank Directive:** (i) Undertakes free, prior, and informed consultations if Indigenous Peoples are potentially affected (positively or negatively) to determine whether there is broad community support for the program. (ii) Ensures that Indigenous Peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples. (iii) Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits.

#### A. Applicability

118. Core Principle 5 is **applicable** to the Program as the program activities, especially the skill development and entrepreneurship related activities, will include community members from vulnerable and disadvantaged groups such as, SC/ST/OBC groups; PwDs; youth from childcare institutions; dropouts and unemployed women and youth; rural communities in remote areas etc.

#### B. Systems Assessment

119. The existing regulatory framework provides adequate protection for vulnerable and disadvantaged groups including protections for Scheduled Tribes under the Constitution of India, and the Panchayati Raj Act. The existing schemes and policies include special provisions for vulnerable and disadvantaged groups. For instance, the National Policy on Skill Development and Entrepreneurship promotes entrepreneurship among under-represented groups, suggesting special focus to be given to the inclusion of scheduled castes and scheduled tribes, minorities, differently abled, etc. It also promotes enrolment of incubators and mentors catering to these groups in the national entrepreneurial ecosystem.

### C. Gaps and Recommendations

120. It would be important to ensure that representatives of Scheduled Tribes are adequately consulted with to inform the Women Quality Employment Plans (WQEPs) at the district-level. A dedicated behavior change and communication strategy would be needed to ensure the differentiated needs of specific vulnerable and disadvantaged groups are included and detailed strategies/ methods/tools for engagement with each group are mapped. Community participation would be ensured for developing this strategy and monitoring would be done through the involvement of community members.

## CORE PRINCIPLE #6

**Bank Policy:** *Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.*

**Bank Directive:** *Considers conflict risks, including distributional equity and cultural sensitivities*

### A. Applicability

121. Core principle 6 is **not applicable** for the proposed Program. The project activities are not expected to exacerbate social conflict at the state, district or village level.

## 10. Recommendations and Action Plans

122. This section recommends measures that will be taken to strengthen system performance in line with the gaps and risks identified in the system assessment section to ensure that the Program interventions are aligned with the Core Principles of Bank Policy for Program-for-Results financing. The identified key areas are elucidated below. These actions may be further refined and adjusted during the consultation process and the implementation of the Program.

### 10.1 Exclusion of High-Risk Activities

123. The Bank's Program was reviewed to ensure that activities with certain characteristics are not eligible for inclusion in the PforR operation. Based on the assessment, it was confirmed that the following high-risk activities would be excluded from the Program. During the implementation, the GoTN will be required to ensure that all such activities remain excluded:

- No new construction/ major civil works within and in proximity of Protected Areas and other ecologically sensitive areas.
- No infrastructure activities and investments in ecologically sensitive zones.
- No activities/major civil works that pose risks to areas of ecological and cultural heritage significance.
- No large-scale changes in land use or access to land and/or natural resources.
- No land acquisition and/or resettlement would be undertaken under the Program. The project activities would not involve any construction where private land acquisition is required or any land for which clear title or any recognizable claim is not available with the government.
- No activities that involve the use of forced or child labour;
- No activities which could lead to marginalization of, or conflict within or among, social groups;
- No activities that would have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation or common property resources; or cause relocation of Indigenous People/ tribal communities or have significant impact on them.

### 10.2 Key Highlights of Gaps and Recommendations

124. Based on the environmental and social systems assessment, the following are the key recommendations for managing environmental and social risks in this PforR:

- a. **Strengthening Grievance Redressal Mechanism:** There are multiple Grievance Redressal Mechanisms across all the implementing agencies. Most of the agencies has a parallel mechanism including separate mechanisms for handling complaints on the different schemes and programs. In addition, the Chief Minister's Grievance Portal also receives complaints which may be related to the activities under this PforR operation, and which would be directed to the nodal officer designated under each implementing agency. While these parallel systems are operating simultaneously, there are some gaps. There is no consistent service standard in the time taken to take action on the grievance, to report back to the aggrieved person and regular reporting and monitoring of data on grievances.

- b. **Strengthen Stakeholder Engagement:** There are multiple schemes operating which play a crucial role in enhancing women's employability and economic independence. These schemes have thousands of beneficiaries across the state. However, the potential benefits of these social welfare schemes are weakened due to a lack of focus on stakeholder engagement. Increase in the number and frequency of stakeholder engagement activities, forums for beneficiaries to interact with each other, industry partners and the overall professional ecosystem would enhance the value of operation interventions.
- c. **Include environmental and social sustainability content in training modules:** The current trainings provided to entrepreneurs (under EDII, Startup TN for MSME scheme beneficiaries) and college students (under Naan Mudhalvan and Short-Term Skilling courses) are providing them support to meet the requirements of business and professional life. In this context it is important to incorporate environmental and social sustainability into the training modules. This would help to mainstream these concepts into the next generation of the workforce.
- d. **Strengthen handling of SEA/SH risks:** Many of the project beneficiaries are women and adolescent girls and women, in particular. These groups are vulnerable to risks of sexual exploitation and abuse and sexual harassment. It is important that all the implementing agencies and training partners have adequate systems in place as mandated by the POSH Act (e.g. setting up Internal Complaints Committees), conducting regular awareness campaigns among staff and for beneficiaries on sexual harassment and displaying all requisite information prominently in all their premises, particularly those where there is interface with beneficiaries. The grievance handling officers also need to be sensitized on handling SEA/SH grievances. This should be implemented with all implementing agencies at all levels, working women's hostels, incubators, ITIs, colleges.
- e. **Strengthen Environment Management systems and promote green practices in operations of hostels and creche facilities** - Compliance to existing rules and guidance on pollution management and OHS of workers need to be observed during refurbishment activities and minor civil/O&M Works on site. Quarterly E&S reports (aligned with PMU reports) could include a dedicated section on Pollution management and OHS monitoring in all active refurbishment sites. The PMU E&S staff and World Bank ESSs are also suggested to work closely with SWWED to promote good environment practices (like waste segregation, recycling, rainwater harvesting, eco programs, awareness campaigns on sustainable operations) in selected hostels and mainstream and environment management and monitoring protocol/system in the operations of these facilities.
- f. **Strengthen Environmental and Social Risk Management Capacity in the PMU:** An Environmental and Social Expert would be required at the PMU as the nodal person for monitoring progress on all environmental and social risk management actions across all implementing agencies.

### 10.3 Recommended E&S Actions in the Program Action Plan

125. The following table includes the ESSA inputs into the overall Program Action Plan:

Action Description	Responsibility	Due Date	Completion Measurement
Appoint nodal officer for environmental and social risk management in the SPID/PMU and priority nodal agencies	SPID/PMU	31-Oct-2024	E&S focal persons assigned at PMU and at the priority Nodal agencies .
Develop SOP to strengthen Grievance Redressal Management systems across nodal departments and implementing agencies.	SPID/PMU	31-Dec-2024	SPID/PMU prepares SOP for GRM to be implemented by all priority departments. This would cover the GRM process, responsible staff, escalation matrix, feedback loop, recording of grievances reporting, monitoring and evaluation.
Development of guideline and action plan for mainstreaming Social and Environment Inclusions (including Gender aspects) and Citizens Engagements measures (GRM, Communication, Social Accountability) in to program implementation.	SPID/PMU	31-Dec-2024	SPID/PMU shares will share approved guideline and action plan ready for implementation.
Include mandatory training modules on Environment Management and sustainability practices in the short term training programs	SPID/PMU	31-Dec-2024	E&S focal persons assigned at PMU and at the priority Nodal agencies

### 10.4 Implementation Support Plan

126. The Bank's implementation support should focus on helping the client achieve the program results and DLIs, by strengthening systems and procedures related to environmental and social aspects. The specific focus for environment and social risk management should be on: (a) ensuring the environment and social specialist in the PMU is maintained throughout implementation of project activities to address the program requirements; (b) augmenting capacity of the staff in the PMU and the Implementing Agencies, nodal officers in the priority departments and other relevant stakeholders on environment and social risk management through trainings on aspects such as E&S risk screening, response to SEA/SH risks, grievance redressal, community engagement etc.; (c) adopting social risk screening procedures to exclude

activities involving adverse impacts such as land acquisition, child labor, etc.; (e) streamlining the monitoring and reporting process on social issues such as community and occupational health and safety during civil works, beneficiary engagement, social inclusion and grievance management; and (d) strengthening community engagement through a dedicated behavior change and communication strategy.

## 11. Consultations and Disclosure

127. This chapter provides details on the consultations and disclosure relating to (a) conducting the ESSA and (b) the program activities.

### 11.1 Stakeholder mapping

128. The table below lists the key stakeholders who would have a direct interest in and influence on the implementation of the operation. In addition to these direct stakeholders, there are indirect benefits to the larger society, educational, professional and entrepreneurial ecosystem in the state.

Key Stakeholders	Interest	Influence
Special Program Implementation Department	Moderate	High
State Level Program Steering Committee	Moderate	High
Tamil Nadu Skills Development Corporation	Moderate	High
Commissionerate of Social Welfare	High	High
Micro Small and Medium Enterprises Department	Moderate	High
Commissionerate of Industries and Commerce	Moderate	High
Startup TN	Moderate	High
College students (beneficiaries of Naan Mudhalvan and Pudhumai Pen schemes)	High	Low
Other Students (beneficiaries of short term skills training programmes)	High	Low
Entrepreneurs (beneficiaries of UYEGP, NEEDS and AABCS and recipients of startup incubation and other support services)	High	Low
Business Incubators	Moderate	High
Working Women's Hostel operators	Moderate	High
Short term contractors to do minor renovation and upgradation works for hostels and creches	Low	Moderate
Grievance Redressal Officials in all departments	Moderate	High

### 11.2 Stakeholder Consultations

129. The table below provides a summary of the discussions and findings from consultations with key stakeholders. Photographs from the consultations and site visits are in Annexure C.

No.	Stakeholder and Department	Date	Key Discussions and Findings
1.	Beneficiaries and Nodal Officers of the Pudhumai Penn Scheme  Ms. Haritha, District Social Welfare Officer	February 15, 2024	<ul style="list-style-type: none"><li>• Beneficiaries of the Pudhumai Penn Scheme belonging to the Meenakshi College of Engineering, School of Nursing, Stanley Medical College and the Communicable Disease Hospital joined the consultations. Nodal officers</li></ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
			<p>responsible for the Pudhumai Penn Scheme from these colleges also joined the consultations.</p> <ul style="list-style-type: none"> <li>• The group had beneficiaries who had been getting program benefits from 4 months to over 15 months.</li> <li>• Some of the key challenges in accessing the scheme benefits relate to obtaining the required documentation, especially getting the Aadhar seeding done for the bank account.</li> <li>• Nodal officers assist the beneficiaries to get registered. They also track attendance of beneficiaries twice a year and are expected to update records in case of dropouts and transfers.</li> <li>• Field level officers visit government schools 4 days a week and spread awareness about this scheme and requirements to avail its benefits, in addition to IEC material which is widely circulated and advertised.</li> <li>• In case of delays due to documentation, Bank and Aadhar formalities, payments to beneficiaries commence from the date on which the problems are resolved, and the beneficiary is enrolled. There is no provision for receiving arrears in case of such delays.</li> <li>• There is a dedicated grievance portal for Naan Mudhalvan, which is monitored by the District Social Welfare Officer. The state level PMU also has a Grievance Officer who monitors the portal. Grievances can be recorded on by phone, email or through the portal. Many people also use the Chief Minister's Complaint Cell for registering grievances. Some people even visit the Collector's office directly if required. Chief Minister's cell complaints get routed to the concerned department and are tracked by the district administration.</li> <li>• Beneficiaries come from largely rural and disadvantaged backgrounds and are mostly first-generation graduates. Families are mostly engaged in agricultural work, labour, as factory workers, or in the service industry. Many come from families having a single source of income as</li> </ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
			<p>well as parents having disabilities. The program benefits have allowed many of them to aspire to and continue higher education, without which they may have been forced to find low-paying work right after school, or even get married. Program benefits are usually used by the students in meeting expenses like transport, mess fees, exam fees, study equipment or even taking on extra courses. In Chennai, they estimate living expenses to be in the range of INR 5000 to 7000 per month. In this context, the Pudhumai Penn grant of INR 1000 per month is a significant contribution.</p>
2.	<p>MSME Department and Entrepreneurs - Beneficiaries of MSME Schemes NEEDS, UYEGP and AABCS</p> <p>Mr. Elangovan, Regional Joint Director, Commissionerate of Industries and Commerce, Chennai</p>	February 15, 2024	<ul style="list-style-type: none"> <li>● Consultations were held with around 10 female entrepreneurs who have received support under the MSME Schemes NEEDS, UYEGP and AABCS. They own enterprises across sectors ranging from services like restaurants, cafes, diagnostic labs and beauty salons, as well as manufacturing of machinery, fishing equipment and organic foods.</li> <li>● The beneficiaries have received significant support from the MSME department including guidance on the loan process, documentation requirements, DPRs, quotations, preparation for interview with the Collector, perspectives on growth etc.</li> <li>● They have faced challenges in getting their loans from the Banks even after approval from MSME department. Some challenges include requirement of collateral,</li> <li>● There are variations in the experience of entrepreneurs getting benefits in different districts.</li> <li>● MSME has a grievance portal for receiving grievances related to their schemes.</li> <li>● Most beneficiaries found out about the schemes through word of mouth and through other previous beneficiaries. They felt that awareness of the available schemes is low among entrepreneurs.</li> </ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
			<ul style="list-style-type: none"> <li>● Scheme beneficiaries are required to mandatorily take an Entrepreneurship Development training which is designed and operated by the EDII. This is an online training module with built in questionnaires for assessments. This is a generic training module for entrepreneurs, covering topics like marketing, accounts, manpower/HR management and personality development. There is a proposal to have some offline modules as well in the future.</li> <li>● MSME Department has schemes where 5% extra subsidy is given for enterprises in green sectors like e-waste. This is in case of schemes for capital subsidy, not self-employment schemes like NEEDS, UYEGP and AABCS.</li> <li>● Beneficiaries identify lack of a platform or opportunities like events to network with other entrepreneurs, avenues of funding and the larger entrepreneurship ecosystem, as a big gap. They feel the lack of access, knowledge and information as an acute handicap.</li> <li>● Beneficiaries would like access to sector specific trainings as well as trainings in subjects like sustainability, waste management, green jobs etc. They would also like the opportunity for mentorship and interaction with other successful entrepreneurs.</li> <li>● Beneficiaries also suggested that a helpline for requisite information regarding these schemes would be helpful.</li> </ul>
3.	Trainers and Students at the Industrial Training Institute (TATA 4.0 ITI) by TNSDC  Mr. Sasidharan AD, Skill Development, Chennai	February 15, 2024	<ul style="list-style-type: none"> <li>● These are short term skilling courses run for ITI students. Students receive a monthly stipend, uniform and transport costs.</li> <li>● The courses seen at the centre included robotics, automation, plumbing, Internet of Things (IoT), Product Design and Development, Electric Vehicles. Students receive counselling on deciding which courses to take.</li> <li>● The ITI had male and female students. While courses can be mixed, groups tend to be gender</li> </ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
			<p>segregated by and large. The ITI has separate bathrooms for males and females.</p> <ul style="list-style-type: none"> <li>The ITI is under live CCTV Monitoring and takes biometric attendance. There is regular monitoring to verify attendance and functionality of the ITI from the TNSDC.</li> <li>There are multiple training centres like this one with various private sector partners.</li> </ul>
4.	<p>Chellamall College, Principal and students (beneficiaries of the Naan Mudhalvan Scheme)</p> <p>Mr. Adarsh, Program Manager, Naan Mudhalvan, Chennai</p>	February 15, 2024	<ul style="list-style-type: none"> <li>Consultations were held with college students who are benefitting from Naan Mudhalvan courses. These upskilling courses are integrated into their degree programs and account for two credits. These are designed to enhance the employability of the beneficiaries. This scheme is applicable for all government and government aided colleges except for medical colleges.</li> <li>The courses are on topics aligned with the main degree e.g. tally, digital marketing, EV battery management, port logistics, python and data analytics and oracle. Some of the courses are done online and others are offline. Online courses may have some live sessions and others would be recorded modules.</li> <li>As part of the program, every six months, consultation is done with industry partners to ascertain the current needs of the market. Accordingly, the courses are designed and provided to the students.</li> <li>Students have had a positive experience with these courses, which they felt are giving them an insight into options they did not know of earlier, and also making them better equipped for the workforce. Some also felt that these courses are giving them confidence to start their own ventures in the future.</li> </ul>
5.	Crescent Innovation and Incubation Council, in the Crescent Institute of Science and Technology	February 16, 2024	<ul style="list-style-type: none"> <li>This is a business incubator associated with Startup TN established in 2019, primarily focusing on startups in sectors like life sciences (agri tech, med-tech, bio-energy, bio-pharma, bio-services,</li> </ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
	Ms. Nisha Mukund, CEO, CIIC		<p>bio-industrial), Industry 4.0 (Artificial Intelligence, Machine Learning, Internet of Things, Robotics, AR/VR, System Integration, Simulation, Big Data, Cloud Computing), and Smart and Clean mobility (drone technology, smart and non-fossil fuel vehicles, EV, EV battery management and autonomous navigation). This incubator has recently received sanction for establishment of an Atal Incubation Centre (AIC) which is under progress in the same campus.</p> <ul style="list-style-type: none"> <li>● This incubator acts as a one-stop-shop for startups that facilitates entrepreneurial and innovative ecosystem for all stakeholders. It offers office space, lab space, marketing services, training and workshops, seminars, legal services, including IPR and provides support to startups in connecting with investors, accessing seed funding and industry partners.</li> <li>● It is a Section 8 company having multiple campuses (in Madurai, Chennai and Bangalore) as well as multiple tie-ups with various partners. The incubator is ISO certified.</li> <li>● It has well-established industry partnerships with companies like Tata and Ashok Leyland as well as support from organizations like Intel for establishing centres and labs for life sciences, Industry 4.0 and smart and clean mobility.</li> <li>● It regularly conducts events like Demo Days for getting startups and investors together as well as hackathons.</li> <li>● In order to be eligible as a 'startup' and get incubator services, startups require DPIIT certification through the Startup India portal. An applicant, after validation can get pre-incubation services for two months. Thereafter they can get incubation services and depending upon their readiness and revenue, they could get to the accelerator stage.</li> <li>● The incubator services are charged per month with additional charges for using labs and other technical facilities.</li> </ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
			<ul style="list-style-type: none"> <li>● Incubators also facilitate regular tripartite discussions with MSME Development Institute, which also helps startups to get information about schemes for obtaining loans etc. In fact, a large proportion of the incubate startups are coming through referrals from the MSME Department.</li> <li>● The incubator has policies to encourage women-led startups, which get a 10% discount on charges for incubator facilities including co-working spaces (where a woman has &gt; 51% equity).</li> <li>● The incubator also prioritizes ESG concerns and supports implementing good ESG practices among incubate companies. They are responding to market forces and a strong push from the investing community. There is a lack of clarity reported among the startup community on appropriate ESG guidelines, especially since there is a lot of variation in requirements depending on the product. There are some SEBI guidelines. However, those are applicable for listed companies only.</li> <li>● Incubatee companies face challenges in understanding and implementing requirements of the POSH Act. The incubator provides support but would benefit from more specific guidelines and trainings.</li> <li>● The incubator has an Internal Complaints Committee as part of the Crescent Institute.</li> <li>● There is a greater need for awareness and support to women entrepreneurs and founders as many of them are not active members of the founding team.</li> </ul>
6.	Startup TN  Ms. Akila, Project Lead for Women's Initiatives at Startup TN	February 16, 2024	<ul style="list-style-type: none"> <li>● Discussed the implementation status of the GO on Startup TN initiatives on women-led startups and green tech startups.</li> <li>● Startup TN conducts programs and awareness sessions among startups. For instance, in the last year they organized Break the Barrier programs where they got startup successes to speak, mentors, technical experts etc. They also ran another program called 'Playing Pitch' Aadu Kalam</li> </ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
			<p>to help startups present to funders, not to seek funding but to improve their pitches. Additionally, they partner with various training partners and actively disseminate information on regarding the startup ecosystem with companies.</p> <ul style="list-style-type: none"> <li>Recently, Startup TN launched a Sustainability Forum where they invited sustainability mentors, ESG experts etc. to improve the understanding of these issues among Startups.</li> </ul>
7.	Visit to the Working Women's Hostel, Social Welfare Department in Adyar	February 16, 2024	<ul style="list-style-type: none"> <li>The Working Women's hostel in Adyar has been recently refurbished.</li> <li>The facility has security arrangements such as biometric entry, double gated barrier, attendance every evening and permission required for night outs.</li> <li>Each floor has an RO water cooler, washing machine, microwave, kettle and ironing box.</li> <li>There are shared bathrooms on each floor with geysers. There is wifi facility for all residents.</li> <li>Rooms can be rented on an individual basis or sharing up to 6 persons to a room. The rent ranges from INR 4000 per month up to INR 10000 depending on occupancy and facilities like AC.</li> <li>This hostel houses 98 women. Most women are typically engaged in jobs like IT, police and medicine. There are some students who use the hostel as well. Most residents are between 18-40 years of age. The hostel allows women to stay with children under 5 years of age.</li> <li>Apart from the warden, there are 2 security staff and 4 housekeeping staff who work round the clock in rotational shifts.</li> <li>No solar installations were observed. No particular importance is given to responsible waste management and the waste is disposed simply by giving to the municipality.</li> </ul>
8.	Startup TN	November 24, 2023	<ul style="list-style-type: none"> <li>Discussed the process of applications for the TANSEED and TN SC ST Startup Fund.</li> </ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
			<ul style="list-style-type: none"> <li>Startup TN has a network of incubators across the state.</li> <li>New TN Startup Policy recently launched focusing on inclusive entrepreneurship, circular economy, green tech, women led, ST transgender and differently abled</li> <li>Focus is on specific sectors and startups in tier 2, 3 and 4 towns</li> </ul>
9.	Tamil Nadu Skill Development Corporation  Mr. Raj Kumar, DRO, TNSDC	November 24, 2023	<ul style="list-style-type: none"> <li>Discussed the short-term skilling and Naan Mudhalvan courses</li> <li>They conduct training through registered training partners, all of whom are required to be certified by Sector Skill Council (SSC). Now TNSDC has also become an awarding body (NCVET).</li> <li>Training centres have Aadhar linked biometric attendance, live CCTV feed monitoring and outcome measured through data on enrollment, attendance, completion and placement. Monitoring includes regular and surprise inspections. Scrutinizing Committee for quality checks</li> <li>GRM and ICC were discussed</li> <li>Staffing is a challenge especially at district level</li> </ul>
10.	Commissionerate of Industries and Commerce under Department of MSME	November 24, 2023	<ul style="list-style-type: none"> <li>Mandate is to cater to the development of industries. Discussed NEEDS, UYEGP and AABCS Schemes for obtaining loans for entrepreneurs.</li> <li>Monitoring includes quarterly visits to the units by District level officer</li> <li>GRM and ICC were discussed</li> <li>Staffing is a challenge</li> </ul>
11.	Commissionerate of Social Welfare	November 24, 2023	<ul style="list-style-type: none"> <li>Discussed Pudhumai Penn and working women's hostels initiatives.</li> <li>Key gaps in hostels – CCTV, dustbins, dining area, recreation area, dampness, geysers, biometric access, wifi, more staff for housekeeping, rainwater harvesting, Maintenance is outsourced to agencies.</li> </ul>
12.	Representatives from the corporate sector	May 14, 2024	<ul style="list-style-type: none"> <li>Many industries are now establishing DEI policies, plans and initiatives</li> </ul>

No.	Stakeholder and Department	Date	Key Discussions and Findings
			<ul style="list-style-type: none"> <li>● Industries which want to encourage women's employment are undertaking conscious initiatives to promote the same. These include establishment of creches, hostels, provision of safe transportation facility, options for flexible and part-time working hours, sabbaticals, additional trainings etc. Women's unique needs like childcare and eldercare responsibilities need to be considered.</li> <li>● Extra effort is required for upskilling of women in marketable skills, data skills, practical skills, emotional resilience, mental health support.</li> <li>● Women employees require targeted support for getting into leadership or managerial roles such as in the form of mentorship or allyship programs</li> <li>● Industries value skill-based training on the job. Compulsory modules for such trainings for students are recommended.</li> <li>● Hostel costs are significant for companies. Increased government hostels in industry clusters would help.</li> <li>● Improved bus routes targeting industry clusters are required to facilitate attracting women employees from a larger geographical radius.</li> <li>● Strong implementation and awareness about laws like the POSH Act is important to create a safe working environment for women.</li> <li>● An attractive ecosystem would attract women employees from outside the districts and states as well</li> </ul>

## Annexures

### Annexure A: Secondary Literature Reviewed

#### **Key References, Sources and Websites:**

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25. Expanding Opportunities: Towards Inclusive Growth, *South Asia Economic Focus, World Bank Group, Spring 2023*
26. Reshaping Norms, A New Way Forward, *South Asia Economic Focus, World Bank Group, Spring 2022*

## Annexure B: Legal and Regulatory Framework - Environment and Social

This Annexure provides details on the key environmental policies, laws, regulations and guidelines that are of relevance to the activities under the PforR. It also provides an assessment of the adequacy of the coverage on environmental and social aspects in the legislative and regulatory framework.

### National Framework – Environment

This section provides details on the national level policies, laws, regulations as well as guidelines that are relevant to the environmental aspects related to the activities supported under WeSafe PF4

Environmental Policies, Laws and Regulations	Extract of the legal instrument	Relevance to the interventions proposed
<b>National policy on Safety, Health and Environment at Workplace</b>	This is an overarching policy that is focused on building and maintaining a national preventative safety & health culture, and improving the safety, health and environment at workplace. The policy expresses a set of the national objectives and outlines specific working areas (including enforcement, national standards, compliance, awareness, research and development, occupational safety and health skills development and data collection) for action planning.	This policy is relevant in two ways to the program. One is its enforcement to ensure health and safety of workplaces and training centers and may include training programs to increase the number and competence of personnel engaged in the field of occupational safety, health and environment at workplace. The other is by integrating health and safety into vocational training programs by adopting occupational safety and health training curricula in workplace and industry programs.
<b>National Policy on Skill Development and Entrepreneurship 2015</b>	While this policy focuses on skill development with speed, standard and sustainability, it includes specific references to environmental aspects. It specifies that mentorship support will be provided to eligible non-government organizations (NGOs) to scale and create sustainable models for skill development for Green Jobs (agriculture, horticulture, renewable energy, recycling, eco-tourism, etc.)	This policy is relevant to the capacity building and skill development components of the entire PFR.
<b>The Environment (Protection) Act, 1986 (amended in 1991)</b>	This umbrella law enables the government to take measures it deems necessary to protect and improve the environment, and to prevent, control and abate environmental pollution.	Although EIAs will not be required for any interventions in the program (As the interventions will be restricted to minor civil works only ) the

Environmental Policies, Laws and Regulations	Extract of the legal instrument	Relevance to the interventions proposed
	<p>The regulations under the Act that are of relevance to the Program is <b>Environmental Impact Assessment Notification, 2006 and Amendment, 2014</b> which states - Building and Construction projects that are &gt;20,000 sq.m. and &lt;150,000 sq.m. of built-up area, new or expansion of highways etc require prior environmental clearance from the State Environment Impact Assessment Authority (SEIAA) before any construction work, or preparation project, one of which shall be in the vernacular language of the locality concerned.</p>	<p>renovation/upgradation/maintenance works for accommodation, care and elderly facilities; and incubation/training centers will consider the guidance under policy/regulations on pollution management.</p>
Construction and Demolition Waste Management Rules, 2016	<p>The construction and demolition waste management rules stipulate that the generator of construction and demolition waste is responsible for collection, segregation, storage of construction and demolition waste generated as directed or notified by the local authority. The generator will need to ensure that there is no littering or deposition of construction and demolition waste so as to prevent obstruction to the traffic or public or drains; and that the waste is stored and disposed separately at designated disposal sites.</p>	<p>During minor Civil works related interventions.</p>
Water (Prevention & Control of Pollution) Act, 1974	<p>The Water (Prevention and Control of Pollution) Act, 1974 (Water Act) lays down the framework for the prevention and control of water pollution. It mandates industrial activity that are likely to discharge effluents to obtain a prior consent from their respective State Pollution Control Board (SPCB) or Central Pollution Control Board (CPCB) to establish and operate the facility. The CPCB has released a list categorizing various industries into red, orange, green and white based on their pollution potential. These environmental consents prescribe conditions and standards for undertaking industrial activities, based on factors such as the nature of raw materials, products being manufactured, production quantity, emissions, effluents, hazardous and other wastes generated, wastewater utilisation, water consumption and effluent treatment. If there is a non-compliance issue, SPCBs can revoke the CTO and reissue it only after the non-compliance has been rectified.</p>	<p>Relevance to the program is with respect to Civil works as mentioned above</p>
Air (Prevention & Control of Pollution) Act, 1981	<p>The Air (Prevention and Control of Pollution) Act, 1981 (Air Act) lays down the framework for the prevention, control and abatement of air pollution. The Air Act is similar to the Water Act in terms of consent application management, air pollution standards set by the CPCB, and the type of infringements and penalties. It mandates that any industry likely to emit air pollutants must obtain a prior consent to establish and thereafter the consent to operate from</p>	<p>The PforR will support training, capacity building and improving the enabling environment for employment opportunities. The program is expected to support only minor civil works and will NOT result in air pollution that requires a CTO from the SPCB.</p>

Environmental Policies, Laws and Regulations	Extract of the legal instrument	Relevance to the interventions proposed
	the SPCB or CPCB in the concerned state or union territory where the industry is proposed to be located. The central government has introduced the National Ambient Air Quality Standards under the Air Act and standards under the EPA to provide parameters and standards for key air pollutants.	
The Noise Pollution (Regulation and Control) Rules, 2000	The Noise Pollution (Regulation and Control) Rules, 2000 regulate the level of noise in any area. They provide different standards for industrial, commercial, residential and silence zones for day and night. State and local government authorities including the SPCB, UTPCC, District Magistrate, Police Commissioner, or any other officer not below the rank of the Deputy Superintendent of Police designated for this purpose are responsible to enforce the prescribed standards. The rules allow any person to file a complaint with the concerned government authorities if the noise level from any activity exceeds the prescribed standards	Noise regulations will apply to the civil works supported by the project. However, noise is not expected to be a major cause of concern given the nature and scale of civil works that will be supported.
Model Building By-laws 201628, Town and Country Planning Organization, Ministry of Urban Development	The model by-laws include green building and sustainability provisions, rainwater harvesting, fire protection and fire safety requirements, conservation of heritage sites, climate resilient construction, mitigating effects of electromagnetic radiation, etc. These guidelines will be applicable where necessary into the renovation activities.	Minor civil works like Renovation/upgradation of existing facilities (Working Women Hostels)
National Building Code, 2005	The provisions of this code are intended to serve as a model for adoption by Public Works Departments and other government construction departments, local bodies, and construction agencies. The code covers environmental aspects such as liquid and solid waste management, fire and life safety, constructional practices and safety, landscaping and water conservation, etc. PWDs works manual and contract cover these aspects	. Minor civil works like Renovation/upgradation of existing facilities (Working Women Hostels)
The E-Waste (Management) Rules 2016	The E-Waste (Management) Rules, 2016 mandate the environmentally safe management of waste from specified electronic and electrical equipment. Persons producing or marketing such equipment are required to obtain the requisite authorisation from the CPCB and ensure their safe 'end-of-life' disposal as per the Extended Producer Responsibility (EPR) norms.	The e-waste management rules will be relevant to the program as it will support the procurement of IT and electronic equipment (IT systems that will be supported/strengthened by the program for increased connectivity and information management ) that will need to be safely disposed safely at the end of their life.

Environmental Policies, Laws and Regulations	Extract of the legal instrument	Relevance to the interventions proposed
<p><b>The Batteries (Management and Handling) Rules, 2020.</b></p> <p><b>Amended to recommend inclusion of Lithium Ion, Nickle Cadmium batteries<sup>[1]</sup></b></p> <p><a href="https://moef.gov.in/wp-content/uploads/2020/02/BATTERY-RULE.pdf">https://moef.gov.in/wp-content/uploads/2020/02/BATTERY-RULE.pdf</a></p>	<p>The Batteries (Management and Handling) Rules, 2020 in India establish guidelines for the proper disposal, recycling, and management of batteries to protect the environment. They require manufacturers, importers, and assemblers to register and facilitate the take-back of used batteries, and detail the roles of consumers, recyclers, and authorities throughout the battery life cycle</p>	<p>Overall program, with reference to IT systems that may also require batteries.</p> <p>With enhanced digitization under the program, numbers of electronic devices with batteries will increase substantially and their final disposal needs to be properly managed as per the rules</p>
<p><b>Plastic Waste Management Rules 2016.</b></p>	<p>The Plastic Waste Management Rules 2016 mandates the ban of certain plastic products in order to phase out multi-layered plastics and introduces a system of extended producer responsibility in the context of plastic waste management. It covers, for the first-time responsibility of "waste generators", which includes every person generating waste and expands the jurisdiction of applicability from municipal to rural areas. The rules also prescribe a central registration system for the registration of the producer/importer/brand owner.</p>	<p>The plastic waste management rules will be relevant and applicable for the program as procurement of goods for various purposes will involve plastic products that need to be disposed in accordance with the regulations. Further, events organized by relevant departments such as job fairs etc will require event organizers to be responsible for plastic wastes left for proper disposal. Operations in all mapped facilities under the program will also have to incorporate recommendations of the rules.</p>
<p><b>The Solid Waste Management Rules, 2016</b></p>	<p>The Solid Waste Management Rules, 2016 essentially require persons generating solid municipal waste to ensure the segregation, collection and disposal of such waste through specified channels</p>	<p>Operations in relevant mapped facilities under the program will also have to incorporate recommendations of the rules.</p> <p>Applicable for Skilling and training programs</p>

Environmental Policies, Laws and Regulations	Extract of the legal instrument	Relevance to the interventions proposed
<b>National Occupational Standards</b>	<p>The National Occupational Standards (NOS) specify the standard of performance an individual must achieve when carrying out a function in the workplace, together with the knowledge and understanding they need to meet a standard consistently. Each NOS defines one key function in a job role and contributes to the Qualification Pack (QP) for a particular job role. A QP is available for every job role in each industry sector and it covers NOSs on OHS aspects. These drive both the creation of curriculum and assessments.</p>	<p>Operations in relevant mapped facilities under the program will also have to incorporate recommendations of the rules.</p> <p>Applicable for Skilling and training programs</p>

### State Policy & Regulatory Framework

The table provides a snapshot of the key state level policies, laws and regulations that are relevant to WeSafe from an environmental perspective.

State Guidelines and Policies	Extract of the legal instrument	Relevance to the interventions proposed
<b>The Tamil Nadu Combined Development and Building Rules, 2019</b>	<p>The Tamil Nadu Combined Development and Building Rules, aim to streamline the approval process for planning permits and building licenses. This helps in reducing bureaucratic delays and expediting the construction process. The TNCDBRs include recommendations on 1. Improved Sanitation Practices; 2. Focus on Affordable Housing; 3. Compliance with Safety Standards; 4 Environmental Considerations: thus promoting environmentally friendly construction practices. Overall, these rules (currently under further revision) aims to create a more efficient and sustainable construction industry in Tamil Nadu. They provide guidelines and standards that help improve the quality of construction projects and ensure the well-being of workers and the environment.</p>	<p>TNCDBR will be relevant for the PFR to ensure environment considerations are well integrated in the proposed minor civil works, as relevant.</p>
<b>Tamil Nadu Solid Waste Management Rules, 2016</b>	<p>The state-specific solid waste management rules in Tamil Nadu are primarily outlined in the "Tamil Nadu Solid Waste Management Rules, 2016" issued by the Tamil Nadu Pollution Control Board (TNPCB)</p>	<p>Operations in relevant mapped facilities under the program will also have to incorporate recommendations of the rules.</p> <p>Applicable for Skilling and training programs</p>

State Guidelines and Policies	Extract of the legal instrument	Relevance to the interventions proposed
	Key Features include; 1. Mandatory Segregation at Source; 2. Biodegradable Waste Management; 3. Non-Biodegradable Waste Management; 4. Plastic Waste Management; 5. Landfill Management. TNSWM Rules will be relevant for the PFR to ensure the waste generated during minor civil works are properly managed and disposed off sustainably.	
<b>Tamil Nadu state Climate Change action plan</b>	The Tamil Nadu State Action Plan for Climate Change (TNSAPCC) recognizes the impact of climate change on construction and civil works in the state. It highlights the expected increase in extreme temperatures and extreme weather events, such as heavy rainfall, cyclones, and sea surges. TNSAPCC emphasizes the need for sustainable construction practices and calls for the exploration of alternative construction materials, such as manufactured sand and fly ash, to mitigate the environmental impact.	Overall, the TNSAPCC is relevant to this PFR (for minor civil works like retrofitting and refurbishments) as the action plan is an umbrella guidance to promote sustainable and climate-resilient construction (including civil works) in Tamil Nadu.
<b>The TAMIL NADU WATER (P&amp;CP) RULES, 1983 (Prevention and Control of Pollution)</b>	The TAMIL NADU WATER (P&CP) RULES, 1983 (Prevention and Control of Pollution) aim to safeguard the state's water resources from pollution and ensure their sustained use. the TAMIL NADU WATER (P&CP) RULES, 1983, provide a comprehensive framework for water pollution control in Tamil Nadu. While challenges remain, the rules serve as a crucial foundation for protecting the state's precious water resources.	As the PFR includes minor civil works and increase in use of care facilities, optimum and efficient use of water resources is a key, making the rules relevant for the program. Applicable for Skilling and training programs
<b>E-Waste Policy of Tamil Nadu 2010:</b>	Although not legally binding, this policy outlined the state's commitment to minimizing e-waste generation and promoting its responsible management and has a goal to tackle Tamil Nadu's growing E-waste by minimizing generation, maximizing recycling, and protecting the environment. Key points of the policy include; 1. Producer responsibility; 2. Collection network; 3. Public awareness; 4. Green recycling; 5. Skill development; and 6. Research and innovation. The Tamil Nadu government has established guidelines and infrastructure for the collection, segregation, and recycling of e-waste. This includes setting up authorized collection centers and partnering with certified recyclers to process the waste. The government also conducts awareness programs to educate the public and industries about the importance of proper e-waste management. The GoTN has also issued a circular for e-waste management - G.O.Ms. No.18	Since the PFR will include components promoting digital access and procurement of equipment, the policy guidance will be relevant.
<b>Tamil Nadu Operational, Health</b>	Tamil Nadu Operational, Health and Working Condition Rules, 2022, aim to improve worker safety, health, and working conditions in various establishments across the state.	The program interventions may lead to OHS related risks to workers engaged in minor civil works and to employed women in emerging and

State Guidelines and Policies	Extract of the legal instrument	Relevance to the interventions proposed
<b>and Working Condition Rules, 2022</b>	<p>These rules apply to all establishments employing ten or more workers, covering a wide range of sectors like manufacturing, mining, food processing, transport, construction, and healthcare.</p> <p>Excludes certain establishments like mines and agricultural operations governed by separate regulations.</p> <p>4. Cleanliness and hygiene standards in workplaces; 5. Protection of women workers against sexual harassment; 6. Prohibition of child labor and discrimination in employment and 7. Compliance and Monitoring.</p> <p>The rules provide detailed guidelines for specific aspects like first-aid kits, ventilation standards, and personal protective equipment requirements. They</p> <p>Key Recommendations are on optimum: 1. Working Hours; 2. Safety and Healthy working Environment; 3. Welfare and Working Conditions; emphasize the importance of worker participation in safety committees and risk assessment processes. The rules aim to harmonize with the national Labor Code framework while adding state-specific provisions.</p>	non farm sectors, Hence the rules are directly relevant and applicable to program interventions.
<b>Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014</b> <b>And</b> <b>Tamil Nadu Hostels and Homes for Women and Children (Regulation) Rules, 2015</b>	<p>As per the Section 4 of above said act, no working women hostel and homes should function without license. As per the section 5 every person desiring to establish, maintain or conduct hostel, lodging house or home for women and children shall make an application for license to the Collector. Penal provisions have been prescribed in the act for any establishment or homes which do not follow the rules and continue functioning the hostels without registration. All renovation and upgradation work has to be in accordance with the provisions of the Act.</p>	System improvements in selected working women hostels would be guided by the provisions of this act.

## Social Legislations

Sr. No	Name of relevant Act/Policies/Rules	Extract	Relevance to the interventions proposed
1	The Child Labor (Prohibition & Regulation) Act, 1986	This Act prohibits employment of child labor in hazardous activities. It also regulates the conditions of work of children in employments where they are not prohibited for working.	The operation may propose activities where child labor is either prohibited or shall be provided with working condition as per the provisions of the Act.
2	The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act (RFCLARR), 2013	The Act minimizes displacement and to promote, as far as possible, non-displacing or least-displacing alternatives. It also ensures adequate rehabilitation package and expeditious implementation of the rehabilitation process with the active participation of the displaced families.	The operation may lead to development of common facilities, infrastructure or other activities where land and property acquisition may be involved.
	The Tamil Nadu Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Rules, 2017	It also ensures entitlement of compensation, R & R assistance and benefits for the displaced families due to land acquisition with special provisions for ST and SC communities	
3	The Minimum Wages Act, 1948	The Act requires that all employers pay not less than the Minimum Wages fixed by the Government as per provisions of the Act	This operation will propose development activities which will employ labor / worker and all provisions of this Act needs to be complied with.
4	The Payment of Wages Act, 1936	The Act mandates the date by which the payment to the workers should be made and what deductions can be made from the wages of the workers	
5	The Maternity Benefit (amendment) Act, 2017	The Act protects the employment of a woman during the time of her maternity and entitles her to maternity benefit such as leave, crèche etc.	The operation will lead to activities in women may be employed and all provisions of this Act needs to be complied with
6	The Payment of Gratuity Act, 1972	The Act mandates each employer to pay gratuity to its employee on satisfaction of certain conditions on separation if an employee has completed 5 years of employment	The operation may involve minor activities which will employ labor/ worker and all provisions of this Act needs to be complied.

Sr. No	Name of relevant Act/Policies/Rules	Extract	Relevance to the interventions proposed
7	The ESI (Employee state insurance) Act, 1948	The Act ensures that certain benefits to employees are provided in case of sickness, maternity, and employment injury.	The operation will lead to development/strengthening of common facilities, infrastructure or other activities which will employ labor/ worker and needs to comply with the provisions of this Act.
8	Equal Remuneration Act, 1979	The Act provides payment of equal wages for work of equal nature to male and female workers and prohibits discrimination against female employees	The operation will lead to development/strengthening of common facilities, infrastructure or other activities which will employ labor including women and needs to comply with the provisions of this Act.
9	The Workmen's Compensation Act, 1923	The Act provides financial protection to workmen and their dependents in case of injury by accident arising out of and during the course of employment	The project will lead to development/strengthening of common facilities, infrastructure or other activities which will employ labor/ worker and all provisions of this Act needs to be complied.
10	The contract Labor (Regulation and abolition Act, 1970)	The Act regulates the employment of contract labor and prevent exploitation of contract workers by contractors. The Contract Workmen are hired, supervised, and remunerated by the Contractor, who in turn, is remunerated by the Establishment hiring the services of the Contractor.	The project will lead to development/strengthening of common facilities, infrastructure or other activities which may employ contractors and contract labor and all provisions of this Act needs to be complied.
11	The Payment of Bonus Act, 1965	The Act provides for the payment of bonus to persons employed in establishments meeting the defined criteria. The payments of annual bonus is subject to a minimum of 8.33% of wages and maximum of 20% of wages of an employee	The operation will lead to development of common facilities, infrastructure or other activities which will employ labor / worker and all provisions of this Act needs to be complied.
12	The Bonded Labour System (Abolition) Act 1976	The Act provides for the abolition of bonded labour system to prevent the economic and physical exploitation of the weaker sections of the people.	The operation will lead to development of common facilities, infrastructure or other activities which will employ labor/ worker and all provisions of this Act needs to be complied.
13	The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	The Act provides protection to women against sexual harassment at workplace, be it in public or private. It also provides means for the prevention and redress of complaints of sexual harassment against any women employee.	The operation will lead to development of common facilities, infrastructure or other activities which may employ women labor and all provisions of this Act needs to be complied.
14	Building & Other Construction workers (Regulation of Employment	Under the purview of this Act, all the establishments who carry on any building or other construction work and employs 10 or more workers are covered; the employer of the establishment is required to provide safety measures at the	The operation will lead to development of common facilities, infrastructure or other activities which will employ labor/ worker and hence all provisions of this Act needs to be complied.

Sr. No	Name of relevant Act/Policies/Rules	Extract	Relevance to the interventions proposed
	& Condition of Service) Act, 1996	construction site and other welfare measures, such as canteens, first-aid facilities, ambulance, housing accommodation for Workers near the workplace, etc.);	
15.	The Panchayats (Extension to the Scheduled Area) Act, 1996	<p>The Act provide specifying special provisions for Panchayats in Schedule V areas.</p> <p>The Fifth Schedule of the Constitution deals with the administration and control of Scheduled Areas as well as of Scheduled Tribes residing in any State other than the States of Assam, Meghalaya, Tripura, and Mizoram.</p>	This operation may propose activities in scheduled areas. Hence, the planned interventions and their implementation in the scheduled areas need to comply with the provisions of this Act.
16.	The Scheduled Tribes and other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006	This Act grants legal recognition to the rights of traditional forest dwelling communities,	The project development activities may lead to diversion of forest land on which the Scheduled Tribes and other Traditional Forest Dwellers are dependent.
17.	Ancient Monuments and Archaeological Sites and Remains Act, 1958,	<p>As per the act, every area beginning at the limit of the declared ancient site or the ancient monument, as the case may be, and extending to a distance of one hundred meters in all directions shall be the prohibited area in respect of such protected area or protected monument.</p> <p>No permission including carrying out any public work or project essential to the public or other constructions, shall be granted in any prohibited area.</p>	The project development activities may involve interface with or impact on some ancient or archaeologically relevant site.
18	The Right to Information Act, 2005	<p>This Act endeavors to set a system of right to information to citizens to access information under control of public authorities and to promote transparency and accountability in working of every public authority.</p> <p>It requires public authorities to disclose of the particulars, relating to the functions, powers and duties of its officials/ employees, norms, rules, regulations, instructions, records etc.</p> <p>It also requires public disclosures of all relevant information and appointment of designated officer in each public authority.</p>	It is mandatory for al the implementing agencies to implement the provision of this Act.

Sr. No	Name of relevant Act/Policies/Rules	Extract	Relevance to the interventions proposed
<b>19.</b>	Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014	<p>As per the Section 4 of above said Act, no working women hostel and homes should function without license. As per the section 5 every person desiring to establish, maintain or conduct hostel, lodging house or home for women and children shall make an application for license to the Collector. Penal provisions have been prescribed in the Act for any establishment or homes which do not follow the rules and continue functioning the hostels without registration.</p>	<p>The project activities involve refurbishment and updating of working women's hostels, which would have to be in accordance with the stipulations in the Act.</p>
	Tamil Nadu Hostels and Homes for Women and Children (Regulation) Rules, 2015		

Annexure C: ESSA Disclosure Workshop and Consultation (To be updated)

## Annexure D: Photographs from Consultations and Site Visits

### 1. Site visit and Consultations at ITI, Tata 4.0, Chennai (February 15, 2024)



### 2. Consultations at Chellamall College with beneficiaries of the Naan Mudhalvan Scheme (February 15, 2024)



3. Consultations with student beneficiaries of Pudhumai Pen Scheme (February 15, 2024)



4. Consultations with women entrepreneurs, beneficiaries of NEEDS, UYEGP and AABCS Schemes (February 15, 2024)



5. Site visit to Working Women's Hostel, Adyar (February 16, 2024)



#### 6. Visit to Crescent Innovation Incubation Council (February 16, 2024)

