

Inclusion of Indigenous People in Social Security Programmes: Governance Challenges and Way Forward

Executive Summary

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Preface

Indigenous peoples residing in the Chittagong Hill Tracts and other regions of Bangladesh maintain distinct languages, cultures, ethnic identities, and unique ways of life, while also confronting multiple identity-based challenges. Legal frameworks, policy documents, development plans, and strategic reports recognise indigenous communities as poorer, more marginalized, and socio-economically disadvantaged. To address food security, poverty reduction, and sustainable development, Bangladesh implements a broad array of social safety net programmes targeting poor and marginalized populations. While these programmes are instrumental in enhancing food security, reducing poverty, and improving the well-being of indigenous peoples, there remains a significant gap in governance-related, evidence-based research regarding their accessibility and inclusion.

Transparency International Bangladesh (TIB) aims to create an environment that prevents corruption and promotes good governance in Bangladesh. To achieve this, TIB conducts research, policy advocacy, and citizen engagement initiatives that address governance challenges and improve the lives of marginalized and disadvantaged populations. Building on these initiatives, this study identifies governance challenges that affect the inclusion of Indigenous peoples in government-led social security programmes and provides evidence-based policy recommendations. The research analyzes existing laws and policies related to social security programmes, examines stakeholder roles in programme implementation, and evaluates the inclusion of Indigenous communities using key governance indicators.

The study finds that the lack of constitutional recognition of ‘Indigenous peoples’ in Bangladesh alongside various structural and policy-related barriers lead to their exclusion from entitlements. The Small Ethnic Groups Cultural Institutions Act (2010) excluded several indigenous communities from the official list, thereby restricting their access to government services, quotas and social security benefits. While the Eighth Five-Year Plan (2020–2025) and the National Social Security Strategy (2015) acknowledge poverty, food insecurity, low educational attainment, and land disputes among indigenous peoples in the Chittagong Hill Tracts (CHT), similar challenges experienced by indigenous peoples in the plains are not recognized. Although the Eighth Five-Year Plan decided to form a separate perspective plan for the Chittagong Hill Tracts and a land commission for the indigenous people of the plains, it has not been implemented. On one hand indigenous peoples have not been prioritized in the policies of various social security programmes, while on the other hand both the allocation and scope of programmes especially for the indigenous people of the plains have been decreased, despite the National Social Security Action Plan (2016-2026) emphasizes on prioritizing the poor and vulnerable groups and increasing the allocation and scope of programmes for them.

Findings of the study show that although the rights and priorities of indigenous peoples as backward groups are mentioned in the Constitution, various state plans and policies, the inclusion of indigenous peoples in this sector has not been at the expected level. This exclusion primarily results from the absence of explicit recognition of their legitimate and equal rights in relevant laws, policies, and social security programme guidelines. The participation of indigenous peoples has not been ensured in national and local level policy formulation, planning and budget allocation. Appropriate programmes or projects based on the needs and population size of indigenous peoples have not been adopted. There is also no effective participation of indigenous peoples in the overall implementation of social security programmes. On the other hand, due to the lack of capacity in allocating adequate manpower and budget from the central level, the promotion of various programmes, screening of eligible beneficiaries, updating the list and overall supervision of social security programmes are facing challenges. The existing promotion and grievance redressal framework of social security programmes are not participatory and indigenous people-friendly, especially the barriers in language, communication, mobile and internet use are major challenges in this regard. There are structural irregularities and corruption due to bribery, nepotism, political influence, opacity, lack of

accountability and non-compliance with policies at every stage of the social security, which are an additional burden for the marginalized and vulnerable indigenous people.

There are differences and in some cases similarities in the experiences of indigenous people in both the plains and hilly regions in terms of inclusion in social security programmes. The needs and social and cultural characteristics of the indigenous people in both regions have not been properly considered, and adequate allocations have not been made for them in the planning and implementation of social security programmes. In addition, the campaign of social security programmes has not been effectively carried out in the indigenous-dominated areas of the plains. The lack of representation of indigenous people among public representatives, various irregularities and corruption, reluctance and fear in filing complaints, and lack of digital and writing skills are significant obstacles for the inclusion of indigenous people in the plains. On the other hand, the lack of capacity of the relevant authorities in selecting eligible beneficiaries, providing services, especially food distribution, and campaigning are challenges to the inclusion of indigenous people in the hilly regions.

The different needs and realities of indigenous people in the plains and hilly regions have not been properly reflected in the process of determining beneficiaries and implementing social security programmes. Specific guidance on this difference is absent in the relevant plans, laws, and policies. As a result, the needs of indigenous people as marginalized, poor, and vulnerable groups have remained neglected, and the programmes are still being implemented in the conventional way for them. Due to the lack of priority and special importance given to indigenous people as poor, vulnerable, and backward groups, their proper inclusion in the social safety net programmes is still a big challenge.

I express my special gratitude to the indigenous people and the local leaders who helped enrich this research with valuable information. I express my sincere gratitude and appreciation to the various stakeholders in the research area, especially the officials and employees of the concerned departments, public representatives, journalists, NGO representatives and experts in this field who helped with their valuable opinions, experiences and information. I express my sincere gratitude to the research assistants and field data collectors for their contributions to this study. I also extend my heartfelt thanks and appreciation to the concerned Committee of Concerned Citizens (CCC) and Area Coordinators for their support at the local level, and my colleagues in the Civic Engagement Division for their invaluable support.

The research was completed by Research Fellow Razia Sultana, and the overall supervision of the research was carried out by Senior Research Fellow Shahzada M Akram. Special appreciation goes to Muhammad Badiuzzaman, Director, Research and Policy, and Professor Dr. Sumaiya Khair, Advisor, Executive Management of TIB, for providing guidance and valuable opinions during the research. I would like to express my gratitude to my colleagues in the Research and Policy Division and other departments for providing valuable feedback on the presentation of the report.

Our efforts will be fruitful only if the relevant policymakers and other stakeholders benefit from this research's findings and recommendations to prioritize the meaningful inclusion of Indigenous peoples in the development of social security policies and programs. The effectiveness of these initiatives relies on upholding the legitimate rights of indigenous communities and other stakeholders. Readers' suggestions for enhancement, refinement, and correction of this report will be welcomed.

Iftekhharuzzaman
Executive Director

Inclusion of Indigenous People in the Social Security Programmes: Governance Challenges and Way Forward

Executive Summary

1.1 Background and Rationale

The main goal of social security programmes (SSPs) is to alleviate poverty and reduce inequality by providing cash assistance, services, goods, and training. These programmes also strengthen people's ability to manage risks and vulnerabilities throughout their lives, helping prevent deeper poverty. The Constitution of Bangladesh mandates that the state secures the basic necessities of life, including food, clothing, shelter, education, and medical care (Article 15), and safeguards the cultural rights of tribes, minor races, ethnic sects, and communities by requiring the State to protect and develop their unique local cultures and traditions [Article 23(a)]. The Constitution also acknowledges the right to social security in response to vulnerabilities arising from specific situations [Article 15(d)].

The SSPs in Bangladesh began as relief-based social safety net to address the country's post-war poverty and food crisis. Over time, the government shifted toward an inclusive, life-cycle social security approach, culminating in the adoption of the National Social Security Strategy (NSSS) in 2015, which aims to establish a long-term, life-cycle-based system by 2025. In 2015, there were 145 SSPs in place. Subsequently, some programmes were merged or discontinued to streamline operations, resulting in a reduction to 95 SSPs in 2025–26 FY.

According to the Household Income and Expenditure Survey (HIES, 2010), the inclusion rate of marginalised groups in SSPs was 7.31 percent. Among these vulnerable populations, indigenous peoples are at a particularly high risk of poverty. For instance, the poverty rate among indigenous communities is significantly higher than the national rate of 24.3 percent (HIES, 2016)—reaching 65 percent in the Chittagong Hill Tracts and as high as 80 percent in indigenous-inhabited plain land areas. A recent study indicates that the inclusion of indigenous peoples in SSPs remains insignificant, and due to ethnic poverty and associated vulnerabilities, their access to existing programmes also continues to be relatively low.

Several studies conducted by TIB identified governance deficits in ensuring access to government services and the inclusion of marginalized groups in the SSPs. However, there remains a dearth of comprehensive research focusing specifically on the governance challenges in the inclusion and participation processes of indigenous peoples in both the hilly and plain land regions. In this context, this study aims to identify governance challenges associated with the inclusion of indigenous communities in SSPs. It also seeks to provide evidence-based advocacy and recommendations to enhance governance and promote greater inclusion within the SSPs.

1.2 Research Objectives

The overall objective of this study is to identify the governance challenges associated with the inclusion of indigenous peoples in SSPs in Bangladesh. The specific objectives of the study are to:

1. Review existing legal and policy frameworks for SSPs;
2. Examine the roles of stakeholders in implementing SSPs;
3. Identify the forms of irregularities and corruption, as well as their underlying causes in the inclusion processes of SSPs through the lens of good governance; and
4. Provide necessary recommendations to overcome the existing challenges based on the research findings.

1.3 Research Scope

- **Definition of 'Indigenous People' in this study:** In this study indigenous peoples are defined as groups that have historically inhabited their ancestral lands, maintained distinct cultures, languages, and social and political institutions, remained separate from dominant societal

segments, and are committed to preserving and transmitting their ancestral territories, cultural heritage, and identity to future generations.

- **SSPs:** This study includes life cycle-based, special group-focused, and SSPs (11 social assistance programmes, two general subsidy (Food) programmes, four labour market and employment programmes, one community development programmes, and one in social service sector) ongoing during the Fiscal Year (FY) July 2023 to June 2024.

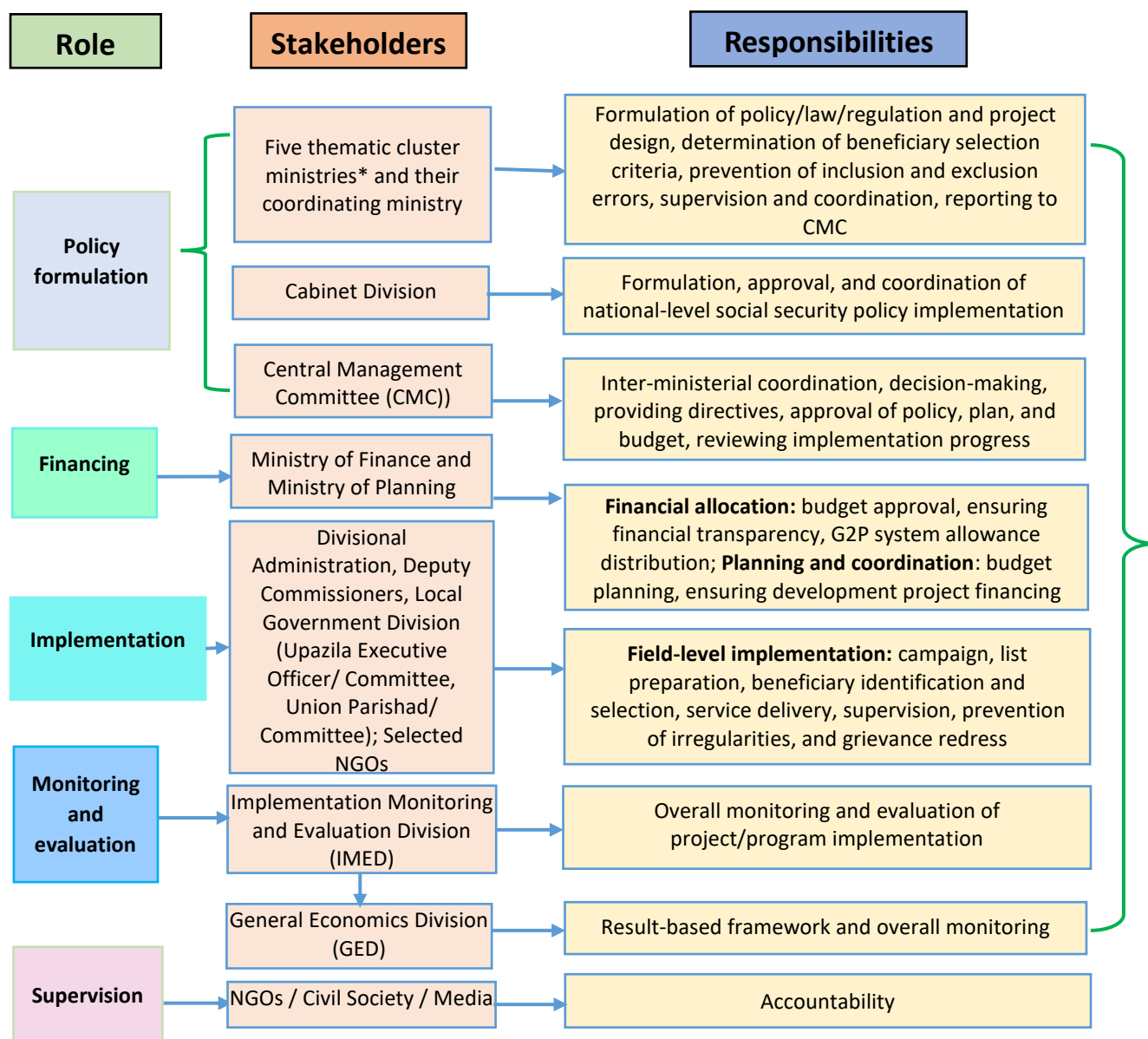
Table 1: SSPs Included in this Study

Nature of programmes	Name of the Programmes
Social Assistance	Old Age Allowance; Allowance for Widow and Deserted Women; Disability Allowance and Education Stipend Programme; Mother and Child Benefit Programme
	Vulnerable Group Feeding (VGF); VGF programme for Fishermen; Gratuitous Relief (Food) (GR)
	Relief Operation-Rehabilitation (House Grant); Work for Money (WFM); Food for Work (FFW); Employment Generation Programme for the Poorest (EGPP)
General subsidy (food)	Food friendly Programme; TCB Family Card programme
Labor market & employment	Vulnerable Women Benefit (VWB) Programme; Provision of working capital and modernization of weaving to improve the socio-economic condition of weavers; Integrated livestock development to improve the socio-economic and standard of life of the backward minorities living in the plain land; Improving the living standards of tea workers
Community development	Development Assistance for Special Areas (Except CHT)
Social Service	Ashrayan-2 Project (Housing provision specifically for Indigenous peoples only)

* SSPs Budget Report: FY 2024–25. Finance Division, Ministry of Finance, Government of the People's Republic of Bangladesh.

- **Definition of Inclusion:** This study defines the inclusion of indigenous peoples in SSPs as encompassing incorporation into relevant laws and policy frameworks, active participation of indigenous representatives in policy-making committees and planning meetings at both national and local levels, involvement in decisions regarding equitable budget allocation for indigenous-focused programmes and projects based on community needs and demographics, engagement in awareness campaigns and application processes, representation in decision-making processes within Upazila and Union committees concerning beneficiary selection and service delivery, and access to grievance redress mechanisms.
- **Target Population:** The study population consists of (1) Indigenous peoples eligible for SSPs, and (2) those who were eligible applicants but not selected for these benefits.
- **Stakeholders Involved in the Planning and Implementation of SSPs:** Stakeholders at various administrative levels undertake distinct roles and responsibilities in the implementation of SSPs (Figure 1). At the national level, the Cabinet Division, cluster ministries, and the Central Management Committee (CMC) oversee policy formulation, approval, and coordination. The Ministry of Finance and the Ministry of Planning are tasked with budget planning and project financing. At the local level, the Upazila Nirbahi Officer (UNO), together with upazila and union committees, manages programme outreach, beneficiary identification, list preparation, service delivery, monitoring, irregularity prevention, and grievance resolution. The Implementation Monitoring and Evaluation Division (IMED) and the General Economics Division (GED) conduct overall monitoring and evaluation.

Figure 1: Stakeholders involved in Planning and Implementation of SSPs



* Ministry of Social Welfare (social assistance); Ministry of Food (food security and disaster assistance); Bank and Financial Institutions Division (social insurance); Ministry of Disaster Management and Relief (labour and livelihood); Ministry of Primary and Mass Education (human development and social empowerment).

1.4 Research Methodology

This research primarily utilizes a qualitative approach, with quantitative data incorporated where relevant. Data were collected and analysed from both primary and secondary sources.

- **Geographical coverage and population:** Based on the number and geographical distribution of Indigenous communities, 11 districts were selected from eight divisions of the country, including eight plain districts and three hill districts. In each district, one upazila was selected based on the size and density of the indigenous population, resulting in a total of 11 upazilas. From each upazila, two unions were selected to ensure geographical diversity and accessibility, yielding a total of 22 unions. Data were collected from 22 Indigenous communities in the plains and seven communities in the hill areas.¹
- **Primary data collection process and sources:** Primary data consisted of information collected through Key Informant Interviews (KII) and Focus Group Discussions (FGD) in the study areas.

¹ Indigenous communities from plain land include Garo, Koch, Munda, Mahato/Kurmi Mahato/Bedia Mahato, Santal, Patra, Bhumij, Khasi, Orao, Rakhine, Pahari/Malpahari, Rajwar, Gorait, Mahali, Manipuri, Ganju, Bagdi, Kora, Sabar, Barman, Hudi, Dalu. Indigenous communities from the hill areas include Chakma, Marma, Tripura, Tanchangya, Pangkhua, Mro, Bom.

- **Key Informant Interviews:** A total of 106 KIIs were conducted at both local and national levels. At the local level, respondents included officials and staff responsible for service delivery at selected Upazila and Union Parishads (UP), local representatives, representatives of indigenous organisations, local community leaders, journalists, and NGO personnel. At the national level, interviews were conducted with officials from relevant ministries and directorates, as well as experts from development organizations working with indigenous communities, and national-level leaders of marginalized groups.
- **Focus Group Discussion:** A total 43 thematic FGDs were conducted with indigenous applicants and beneficiaries of SSPs, as well as their representatives and leaders, across 22 unions. These discussions ensured representation from diverse indigenous communities and incorporated variation among beneficiaries and applicants of different SSPs, strengthening the inclusivity of the data collection process.
- **Secondary data collection process and sources:** Secondary data were obtained from institutional records, documents, and previous research to supplement and contextualize findings from primary sources.
- **Research period:** Research design and planning, data collection, data analysis and report writing of this study has been done during June 2024 to November 2025.

1.5 Analytical Framework

The governance indicators used in this study include legal framework, capacity and effectiveness, participation, accessibility and inclusion, transparency, irregularities and corruption, and accountability (Table 2).

Table 2: Indicators and Issues included in the Study

Governance indicators	Issues
Legal framework	Compliance with relevant laws, regulations, and implementation policies; Practical challenges and process analysis
Capacity and Effectiveness	Capacity and effectiveness of implementing ministries/ departments and local implementing authorities/selection committees (budget, personnel, digitalization, information management, duplication, and verification of eligible beneficiaries)
Participation	Participation of Indigenous peoples in planning, policy, and programme formulation; Participation of beneficiaries and all relevant stakeholders in beneficiary selection; Involvement of Indigenous communities in utility assessment and operational/ management committees
Accessibility and Inclusion	Outreach; Registration; Application requirements; Beneficiary selection; Service Distribution mechanisms
Transparency	Selection of beneficiaries by relevant committees; Voluntary disclosure of information; Accessibility to information
Irregularities and Corruption	Beneficiary selection; Disbursement and delivery of allowances/services
Accountability	Complaint submission and redress mechanisms/framework; Accountability of relevant stakeholders; Investigation and sanction process; Monitoring, evaluation, and oversight mechanisms

2. Major Findings of the Study

2.1 Review of Legal and Policy Frameworks

Legal Framework: The Constitution of Bangladesh refers to indigenous peoples as “tribes,” “minor races,” and “ethnic groups” [Article 6(2)]. However, while ILO Convention 169 recognises the identity of indigenous peoples and their customary land rights, Bangladesh has not ratified this convention. Building on these legal limitations, this lack of constitutional recognition of “indigenous peoples” in Bangladesh thus undermines their hereditary land rights. While the Chittagong Hill Tracts Peace Accord (1997) partially recognised the land rights of indigenous peoples in the Hill Tracts, there remains no separate land law for indigenous peoples in the plainlands. In addition, laws such as the

‘State Acquisition and Tenancy Act, 1950’, ‘Registration Act, 1908’, and other land management laws does not recognise their customary land rights.

A list of 50 ‘small ethnic communities’ was published under the Small Ethnic Communities Cultural Institutions Act, 2010. However, a few indigenous groups were excluded in this list. As a result, indigenous communities excluded from the list are deprived of various government services, allocated quotas, and benefits under social security benefits intended to support them.

The Rights and Protection of Persons with Disabilities Act (2013) requires authorities to identify persons with disabilities by categories specified in the law. However, Upazila committees and Upazila Residential Medical Officers often do not follow these provisions when identifying, registering, and issuing identity cards for persons with disabilities.

Plans and Strategies: The Eighth Five-Year Plan (2020–2025) identified poverty, low literacy rates, food insecurity, and land-related issues primarily among “ethnic communities” in the hill tracts, while largely neglecting the challenges faced by indigenous peoples in the plains. As a result, the Eighth Five-Year Plan did not include targeted strategies to address the specific needs of indigenous peoples in the plains. Although the plan called for the development of a separate *Perspective Plan* for the CHT as part of its strategic objectives and policy guidance, this initiative has not been developed or implemented. Consequently, indigenous communities in the region remain excluded from effective participation in development planning, and the plans do not adequately reflect their distinct social, economic, and geographic circumstances. Additionally, although the Eighth Five-Year Plan decided the establishment of a separate *Land Commission* for indigenous peoples in the plains, this was not materialised. The lack of legal protection in land disputes, combined with insufficient policy provisions addressing Indigenous land issues, has failed to safeguard against the loss of ancestral lands and the forced eviction of Indigenous communities in the plains.

The National Social Security Strategy (NSSS) of 2015 acknowledged poverty and food insecurity among ethnic groups in the CHT, yet it did not address the significant challenges experienced by indigenous peoples in the plains. Although the strategy expressed an intention to develop programmes for marginalised and disadvantaged groups, it failed to specify the distinct needs of these populations. Consequently, targeted initiatives for indigenous communities were lacking. While the NSSS highlighted the role of non-governmental organisations in identifying potential beneficiaries, most social security policies and guidelines did not facilitate this involvement. Despite the strategy’s stated commitment to non-discriminatory access, structural barriers and administrative complexities in obtaining essential documents such as birth certificates, national identity cards, and death certificates continue to exclude indigenous peoples from SSPs. Furthermore, the NSSS advocated for an effective grievance redress mechanism for marginalized groups; however, existing written and online systems remain inaccessible and ineffective due to the lack of language-sensitive approaches for indigenous and disadvantaged communities.

Both the National Social Security Action Plans (during 2016–2026) emphasise the prioritisation of poor and vulnerable populations, as well as the expansion of programme allocation and coverage for these groups. However, indigenous peoples, particularly those residing in the plains, have not received sufficient recognition as a distinct category within the poor and vulnerable populations. Furthermore, the allocation and scope of programmes targeting indigenous populations in the plains have gradually diminished.

Different policy directives of SSPs: Current policy guidelines SSPs lack directives specifying the important content of public awareness materials, including information on the nature, scope, eligibility, and benefits of these programmes. Furthermore, there are no explicit instructions regarding the allocation of the budget for public information dissemination. Consequently, local authorities, particularly the UP, often lack adequate funds for awareness campaigns and public announcements. Programmes including the Food-Friendly Programme, Fishermen VGF, TCB Family Card, Food for Work

(FFW), Money for Work (MFW), and EGPP do not have policy directives for disseminating information regarding programme details, eligibility criteria, application periods, or benefit amounts.

The guidelines of SSPs require upazila offices to update the list of eligible beneficiaries annually by gathering data from union councils, election offices, and the upazila statistics department. However, the absence of formal procedures to record deceased beneficiaries complicates updates. In most unions, beneficiary lists are not updated annually. Consequently, accurately determining allocations at the upazila and union levels, particularly for eligible Indigenous populations, remains a major challenge.

The Ministry of Social Welfare reserves a special quota for poor and marginalized areas in its policies for persons with disabilities, the elderly, widow and deserted women. However, without clear criteria for priority lists and allocation rates, Indigenous peoples face uncertainty about their eligibility under this quota.

Most of the SSP guidelines require local committees to meet one to six times per year for the selection and verification of beneficiaries. However, programmes such as the Food-Friendly Programme (FFP), Fishermen VGF, TCB Family Card, Mother and Child Support Programme, Development Assistance for Special Areas except CHT, and the Integrated Livestock Project for Indigenous people of the plainland do not include this requirement. Without this mandate, participation and decision-making, especially among Indigenous representatives, are reduced, limiting their ability to engage with and benefit from these programmes.

The guidelines for the 'Special Area Development Assistance except Hill Areas' programme require the UNO to select projects assessing the socio-economic conditions and basic needs of marginalized and economically disadvantaged indigenous populations, in consultation with indigenous representatives. In practice, however, many UNOs select projects without adequately verifying the needs of these groups. Additionally, even when local needs are assessed, the priorities of certain indigenous communities are often underrepresented due to the influence exerted by dominant majority indigenous groups.

The policy guidelines for the 'Integrated Livestock Project for Indigenous Communities in the Plains' include a provision to recruit a part-time field facilitator from indigenous communities to oversee beneficiary verification, awareness campaigns, and programme implementation. However, the lack of a clearly defined recruitment process in the policy guidelines has resulted in a tendency to select facilitators from the most directly influenced indigenous group. Consequently, members of less influenced indigenous communities' face barriers to participation and selection within the programme.

The 'Ashrayan-2 Project' guidelines specify that land chosen for housing should not be in areas where transporting materials is difficult, construction costs are high, or the location is remote and hard to access. Consequently, indigenous populations living in remote, hilly, and inaccessible regions face significant barriers to receiving housing, as they are not considered eligible due to these criteria. It is also mandatory to employ a member of the concerned beneficiary family in the construction work, which is not maintained. Furthermore, the standardized housing design ignores the traditions, culture, and lifestyle of indigenous peoples, creating practical obstacles for both hill-dwelling and plain-dwelling indigenous communities in availing these housing benefits. As a result, many indigenous groups are left without access to housing benefits.

Except for the VWB and EGPP programmes, most SSPs lack clear directives for forming complaint committees, setting reporting deadlines, defining investigation procedures, and specifying punitive measures. This absence greatly hinders effective oversight, accountability, and efficiency in grievance redress.

2.2 Capacity and Effectiveness

2.2.1 Financial Allocation

Budget allocation for SSPs: The Sixth Five-Year Plan set a target to increase social security expenditure from 2% to 3% of the GDP by 2015. However, this target was met in FY 2020–21 (3.10 percent). Despite a gradual increase in allocations to the social security sector over the following five fiscal years, the proportion of social security spending in the total budget and its share of GDP have consistently declined.

Table 3: Proportion of Social Security Budget against the National Budget and GDP (FY 2020–21 to 2025–26)

Fiscal Year						
	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26 (Proposed)
Proportion of social security within the total national budget	16.83%	18.8%	17.8%	15.9%	12.8%	14.78%
Share of social security as a percentage of GDP	3.10%	2.8%	2.7%	2.5%	2.4%	1.87%

Social security budget allocations for indigenous people: Between FY 2021-22 and FY 2025-26, the average annual allocation for SSPs was BDT 1,13,264 crore. During this period, the combined average annual allocation for programmes specifically targeting indigenous peoples in the plains and for the hill regions represented just 0.51 percent (BDT 578.85 crore) of the total budget. In FY 2025-26, 41 percent of the total SSP budget was allocated to 36 programmes within the “Social Assistance” category. Since these programmes do not reserve specific quotas or prioritization for indigenous peoples, the actual inclusion rate of indigenous communities within the “Social Assistance” category cannot be determined.

There are no SSP specifically designed for indigenous communities of the hill regions. Between FY 2021-22 and FY 2025-26, the average annual SSP allocation for the hill regions was BDT 423.65 crore, constituting only 0.37 percent of the total budget. Within this allocation, no portion has been explicitly designated for indigenous communities in the hill regions. Consequently, it is not possible to accurately assess how much directly benefits indigenous communities in these areas.

Tables 4: Social Security Budget for Hill Region and Programmes for Plainland Indigenous Communities (FY 2021-22 to FY 2025-26)

Fiscal Year	Total SSP Budget (Crore BDT)	Total SSP Budget for Hill Region (Crore BDT) and proportion (%)	Total SSP budget for Plainland Indigenous People (Crore BDT) and proportion (%)
2021-22	1,07,614	337.31 (0.31%)	132 (0.12%)
2022-23	1,13,576	365.28 (0.32%)	160 (0.14%)
2023-24	1,26,272	409.38 (0.32%)	145 (0.11%)
2024-25	1,02,127	475.61 (0.35%)	189 (0.19%)
2025-26	1,16,731	530.67 (0.45%)	150 (0.13%)

* Analysis of Five-year SSP Budget (FY 2021-22 to FY 2025-26) by the researcher.

On the other hand, between FY 2021-22 and FY 2025-26, the average annual budget allocated to programmes for indigenous peoples in the plains was BDT 155.2 crore, representing only 0.14 percent of the total SSP budget. Both the number of programmes and the corresponding allocations for these communities have shown a consistent decline. In FY 2025-26, several programmes with significant participation of indigenous people, including those for fishermen, weavers, and tea workers, were discontinued. While new initiatives, such as monthly allowances for tea workers, student stipends for the children of tea labourers, and training programmes for unskilled tea labourers, were announced for implementation in FY 2025-26, no such programme is included in the social security budget for FY 2025-26. In the ‘Integrated Livestock Project’ for indigenous peoples in the plains, the number of

beneficiaries remained unchanged, but the allocation was reduced by half. On the other hand, the budget for the 'Development Assistance for Special Areas' project remained constant, while the number of beneficiaries increased. As a result, the per capita allocation for both programmes declined significantly.

2.2.2 Human Resource

Policy guidelines of the Department of Social Services recommend assigning at least one Union Social Worker (USW) per union to verify the eligibility of beneficiaries from applicant lists. In the plain regions, one to three USWs are assigned for an Upazila, which includes several Unions, resulting in understaffing and excessive workloads. Unions in the hill districts face similar challenge in verifying beneficiary lists with limited personnel, especially when the region's difficult terrain and remoteness are not taken into account. The lack of regular 'live verification' by the Upazila Social Services Office further impedes the identification of ineligible or deceased beneficiaries in the old-age, widow, and disability allowance programmes. Additionally, complaints were raised regarding the misclassification of beneficiaries as deceased when they were absent during live verification, resulting in their removal from the beneficiary list.

The UNO often serves as the chairperson or vice-chairperson in multiple government committees. Their frequent transfers also disrupt consistent programme implementation and oversight. A Tag Officer is required to be present at distribution centres during card and food item distribution. However, staff shortages and insufficient travel and daily allowances (TA/DA) result in irregular attendance. In hill regions, officers of one Upazila are responsible for multiple Upazilas, which makes it especially challenging to oversee beneficiary verification, programme implementation, and grievance redressal effectively.

2.2.3 Information Management

At the central level, a complex hierarchy involving multiple cluster ministries has impeded the implementation of a Unified Single Registry System and the effective coordination of programme-specific Management Information Systems (MIS). At the upazila level, insufficient inter-programme coordination among various Upazila offices' MIS hinders efforts to prevent beneficiary duplication across programmes. Additionally, substantial reliance on elected UP representatives for verifying, maintaining, and correcting beneficiary data increases the risk of duplicate beneficiaries, exclusion of eligible individuals, and inclusion of ineligible persons. The exclusion of indigenous communities from priority beneficiary lists, together with this dependence on elected UP representatives, further limits access to the SSP benefits for eligible indigenous beneficiaries.

2.3 Participation

Representation at the Central Level: Indigenous representatives are systematically excluded from central planning and decision-making processes of SSPs. National policymakers frequently disregard the distinct needs, geographic diversity, and specific local contexts of indigenous communities. Consequently, social security policies often employ one-size-fits-all approaches that fail to address indigenous priorities. Furthermore, indigenous representation is absent from central planning and decision-making structures in determining need-based equity budget allocations.

Participation of Indigenous People and NGOs at the Local Level: With the exception of the 'Special Area Development' programme, no directive mandates indigenous representation on other programme committees. This absence results in the formal exclusion of indigenous organisations from project planning, beneficiary selection, and decision-making processes by the relevant authorities. Although indigenous members serve as elected representatives in all Unions of the hill districts and in some Unions of the plains, the specific needs and priorities of marginalised indigenous communities remain insufficiently addressed. Indigenous representatives, *Headmen* and *Karbaris* are typically excluded from primary selection committees for SSPs, and when included, their perspectives are seldom prioritised. Furthermore, aside from the VWB, Mother and Child benefits, Food-Friendly, and

Humanitarian Assistance programmes, there are no provisions for NGO representation in local-level committees of other programmes.

2.4 Accessibility

2.4.1 Publicity and Campaign

Current publicity and campaign efforts by SSPs are insufficient and largely ineffective. Most of the participants reported being informed about these programmes primarily through informal channels, such as word of mouth or information from local UP members, rather than through formal campaign initiatives. Although Union Committees asserted that comprehensive announcements were made, these claims are undermined by the limited use of miking for information dissemination.

“Here, vehicles cannot even reach Wards 8 and 9 ... the announcements are mostly made by the roadside.”

– A UP Member, Bandarban

“The village is far from the road ... the announcements start at the beginning of the village and end after crossing it ... many people cannot hear everything.”

– An Indigenous Beneficiary, Rajshahi

In most Unions, participants did not recall hearing any miking announcements regarding SSPs in the past year. UP members identified geographical location and distance barriers as primary factors contributing to this lack of outreach. Authorities have consistently failed to implement awareness campaigns that inform beneficiaries of their ability to withdraw allowances without incurring fees through the Government-to-Person (G2P) payment system. Although a directive requires the distribution of programme guidelines for the Humanitarian Assistance Programme in every ward, this mandate is not implementing properly. As a result, indigenous populations residing in remote areas often remain unaware of these programmes and are unable to apply.

2.4.2 Registration Process

Online Application Process: Several programmes, including the Old Age Allowance, Widow and Deserted Women Allowance, Disability Allowance and Stipend, Mother and Child Support, VGF for Fishermen, and the VWB, require mandatory online applications. For the Mother and Child Support programme, eligible applicants must submit applications by the 20th of each month to be selected (Figure 2). The mandatory online application process excludes many indigenous people in remote and hilly regions due to limited or absent internet connectivity, electricity, and mobile coverage. In both plain and hilly areas, slow internet speeds frequently hinder applications from Union Digital Centres (UDC). Marginalised groups, particularly indigenous women, the elderly, and individuals with severe disabilities, are often unable to apply online because they lack personal smartphones, digital literacy, or access. Language barriers further intensify these challenges. With the exception of the VWB programme, central authorities do not provide alternative application methods for programmes requiring mandatory online applications. In remote, hilly areas, authorities are not providing adequate time for online applications. Consequently, indigenous applicants unable to submit online applications within the designated timeframe are effectively excluded from registration, creating a substantial barrier to their inclusion in SSPs.

In-Person and Written Application Procedures: Many programmes require in-person or written applications, such as General Subsidy (Food), various Labor Market and Employment initiatives (excluding VWB), Vulnerable Group Feeding (VGF), Food for Work, Work for Money, EGPP, Gratuitous Relief (Food), Cash Grants for Housing, and Improving the Living Standards of Tea Workers. Applicants must submit the application through UP members, Panchayet or the UP Chairman (Figure 3).

Figure 2: Online Application and Benefit receiving Process

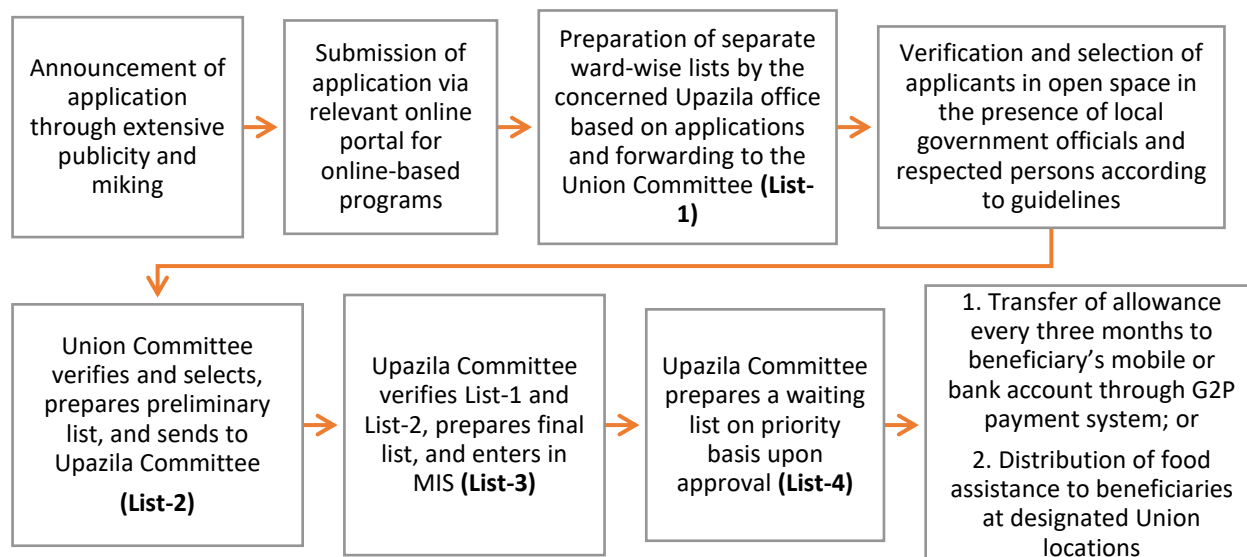
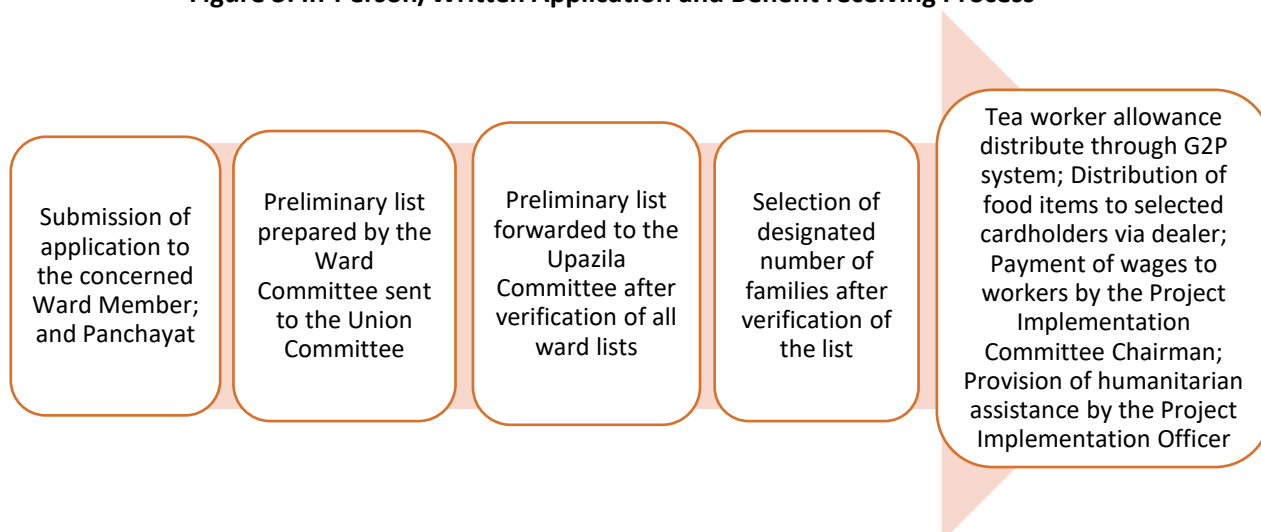
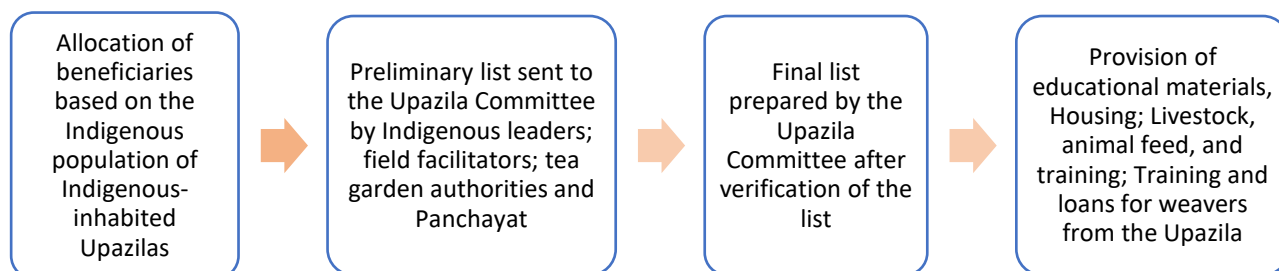


Figure 3: In-Person/Written Application and Benefit receiving Process



In contrast, some programmes allow direct application and beneficiary selection at the Upazila level (Figure 4). These include the Integrated Livestock Development to improve the socio-economic and standard of life of the backward minorities living in the plainland; Development Assistance for Special Areas (except CHT), the Ashrayan-2 Project, and the Provision of working capital and modernisation of weaving to improve the socio-economic condition of weavers.

Figure 4: SSPs Provided Directly from Upazila



Indigenous applicants face significant challenges when applying in person or in writing, including language barriers, low literacy, difficulties obtaining documentation, and a limited understanding of procedures. These challenges often force reliance on UP representatives. Applicants may be unable to provide or verify information accurately, and typically do not receive sufficient support from UP

members or UDC *Uddokta* (entrepreneurs). As a result, their registration in SSPs remains uncertain, restricting their access to programme benefits.

2.4.3 Eligibility Requirements for Application

Indigenous communities often lack sufficient awareness of the procedures required to obtain essential documents such as birth certificates, national identity cards, death certificates, and maternal service cards. This limited awareness creates significant barriers to accessing programmes, including Old Age, Widow and Deserted Women, and Maternal and Child Support Allowances. They also face difficulties correcting official documents at government offices. Although indigenous women are given priority in maternal and child support programmes, factors such as child marriage and underage status often prevent them from meeting eligibility criteria, including age limits (18–35 years) and possession of required documents. As a result, many indigenous women are excluded from the Maternal and Child Support programme and related social protection initiatives.

Marginalized indigenous individuals face significant barriers to meeting eligibility requirements for disability allowance and stipend programmes. Limited awareness of the registration process, geographic isolation, and inadequate digital literacy and access often exclude them from the Disability Information System (DIS). Without disability cards or identity documents, they cannot meet the application criteria or participate in these programmes. Furthermore, assessments of hearing, vision, mental, and multiple disabilities are hampered by insufficient skills, limited expertise, and a lack of essential equipment among medical officers at Upazila Health Complexes.

2.4.4 Allowance Disbursement Process

The government transfers cash allowances directly to the beneficiary's registered mobile number using the G2P payment system under the SSPs such as Old Age, Widow and Deserted Women, Disability, Mother and Child, EGPP, and Tea Worker Allowances. Since cash withdrawals do not require physical verification, the system often fails to promptly identify deceased recipients. Due to infrequent updates to the beneficiary database, payments may continue to be sent to the mobile numbers of deceased individuals. Many elderly indigenous beneficiaries face difficulties withdrawing allowances through agent banking because of frequent fingerprint recognition errors. In remote, hilly areas, poor mobile network coverage and limited phone use often lead to Subscriber Identity Module (SIM) card deactivation, delaying payments and requiring a complex reactivation process. Limited digital literacy, especially among indigenous women, the elderly, and persons with disabilities, further restricts access to allowances. The lack of nearby agent banking outlets or Mobile Financial Services (MFS) points in these regions makes withdrawals more challenging. Consequently, many indigenous beneficiaries depend on third parties to withdraw their allowances, paying service charges to avoid high transportation costs.

The design and implementation of training activities in some programmes (VWB, Mother and Child Benefit) fail to adequately account for local contexts and the specific needs of communities. Training allowances are set below the daily wage rates, and participants frequently incur additional travel expenses due to the distance to training venues. Consequently, working indigenous women encounter substantial barriers to attendance and participation, which restrict their engagement with these capacity-building initiatives.

Relevant authorities, including the UNO, dealers, and UP Chairmen, often do not provide timely or accurate information about food distribution for the Food-Friendly Programme, TCB Family Card, and VWB programmes. As a result, indigenous communities in hill areas face long waits and often do not receive their allocated food. Indigenous women are particularly affected by the high transportation costs needed to collect these food items. Due to cultural and dietary preference, most of the indigenous beneficiaries sell the distributed boiled rice at low prices in local markets, as it does not align with their traditional food habit.

Indigenous weavers from hill regions demonstrate limited participation in the Provision of Working Capital and Modernization of Weaving programme. Contributing factors include language barriers, insufficient communication infrastructure, restricted mobile network access, and inadequate dissemination of programme information. Conversely, in the plain regions, participants complain that Upazila Handloom Board authorities have initiated legal proceedings against indigenous weavers for non-repayment of loans, frequently without adhering to established post-training loan disbursement and repayment procedures.

The baseline survey of the project 'Livestock Development Project for small ethnic communities in the plains' failed to identify a substantial number of eligible indigenous beneficiaries and to adequately assess their needs, resulting in the exclusion of many qualified families. Local officials distributed livestock without adequately assessing local conditions, such as environmental suitability for livestock rearing and the specific needs of Indigenous communities. Furthermore, Upazila Livestock Offices have not consistently delivered regular training or veterinary support as required by policy. Livestock distribution at the Upazila level creates significant barriers for indigenous households, including long distances, insufficient transportation, and high travel costs accessing the programme's benefits.

The Development Assistance Project for Special Areas, except the Hill Tracts programme, administered by the UNO, exhibits significant deficiencies in the verification of beneficiary lists. In particular, educational materials are distributed without adequate evaluation of the actual needs and requirements of Indigenous students. Indigenous communities participating in the Ashrayan-2 Project encounter barriers to accessing housing benefits due to the absence of formal (written) documentation for land ownership obtained through customary law. Consequently, despite meeting eligibility criteria, they are unable to utilize housing facilities on their own or inherited land.

2.4.5 Inclusion in Beneficiary Lists

Indigenous communities have been largely excluded from priority lists in the policy guidelines of SSPs. The VWB programme does not include Indigenous women on its priority lists, and limited programme awareness further restricts their participation. In the labour market and employment programmes, food security initiatives (general subsidies), and social assistance programmes, such as VGF, Fishermen's VGF, GR, FFW, WFM, and EGPP, primarily rely on poverty criteria for beneficiary selection through a 'Distress Priority List'. This approach excludes indigenous populations from receiving special consideration as marginalised groups. Geographic remoteness, weak capacity of union-level selection committees, and missing priority provisions in programme guidelines add uncertainty to including marginalized Indigenous communities in the list of the ultra-poor.

Inclusion of Indigenous Communities in SSPs: According to the information collected from the 22 UPs included in the study, an average of 19.7 percent of the total eligible Indigenous population is included among indigenous applicants and selected beneficiaries in selected five SSPs (Table 5). Limited allocations relative to demand require that beneficiaries be selected from priority lists. However, insufficient outreach and inadequate information dissemination exclude some eligible indigenous individuals at the initial stage, as they remain unaware of the programmes and therefore do not apply. Additionally, the absence of explicit prioritisation for indigenous communities in most programmes, along with violations of selection committee guidelines and instances of irregularities and corruption, further restricts their inclusion. As a result, the participation of indigenous populations in these SSPs remains substantially limited.

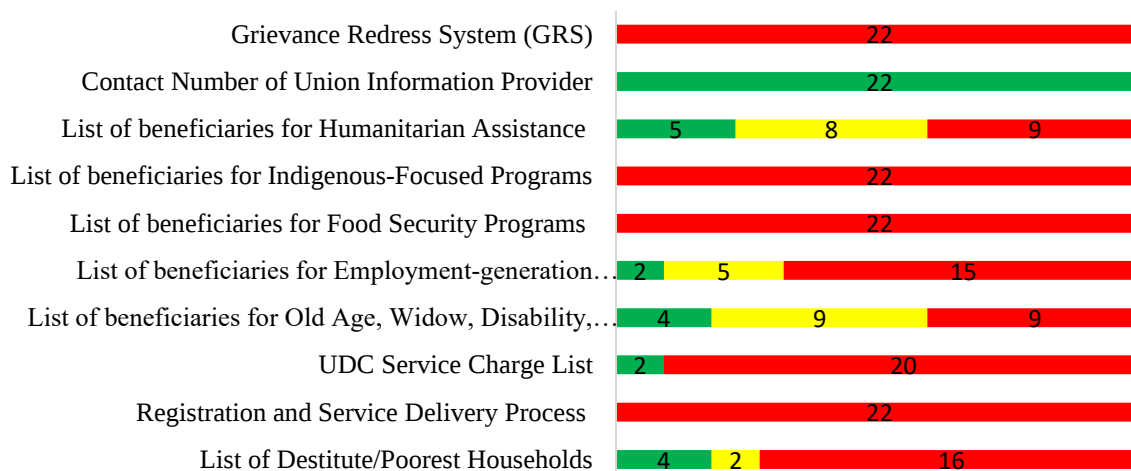
Table 5: Inclusion of Indigenous Communities in Five SSPs

Programme	Total Indigenous Population (Number of Unions)	Eligible Beneficiaries	Applicants	Selected Beneficiaries
Old Age Allowance	33,284 (10 Unions)	1,673	855	355
Allowance for Widowed and Deserted Women	22,310 (8 Unions)	498	166	60
Allowance/Stipend for Persons with Disabilities	24,528 (7 Unions)	583	335	184
Mother and Child Support Allowance	11,907 (6 Unions)	594	181	128
VWB Card	2,606 (4 Unions)	1,338	336	166

*Analysis based on data availability in the 22 Unions (FY 2023–24).

2.5 Transparency

None of the Unions included in the study conducted the beneficiary selection process through an open verification involving community leaders and the general public. The initial selection phase did not include participation from all Union Committee members. Additionally, rather than publicly disclosing the list of selected beneficiaries at the Union level, only the individuals were notified who had been selected. The Upazila Committee finalised beneficiary selection without adequate verification, and the respective Upazila offices did not publish the final beneficiary lists.

Figure 5: Disclosure of Information Related to SSPs on 22 Union Parishad Websites

■ Information is published ■ The updated list is not published ■ Information is not published

Although guidelines for FFW, WFM, and EGPP programmes require that project lists be displayed on signboards at Union Growth Centres and other prominent public locations, this directive was largely disregarded. Committees also did not comply with instructions to publish beneficiary lists and updates on UDCs and UP notice boards. Most UDC *Uddokta* (entrepreneur) did not display service charge lists in UP offices. These shortcomings undermine transparency and restrict accountability.

Most UP websites do not provide essential information related to SSPs. These include GRS, registration procedures, service delivery processes, and beneficiary lists. While some websites display beneficiary lists, these are infrequently updated. Consequently, transparency in beneficiary selection, information accessibility, and public access to programme services remain significantly limited (Figure 5).

2.6 Irregularities and Corruption

2.6.1 Beneficiary Selection Process

Harassment During the Application Process: Indigenous applicants reported experiencing harassment by UP members during the application process. These incidents include document loss, misconduct, and refusal to cooperate. Additionally, the UDC *Uddokta* often neglects to display official service price lists, enabling them to demand unauthorised payments from indigenous applicants.

Nepotism and Political Influence in Beneficiary Selection Processes: The tea garden *Panchayet* is tasked with preparing the initial list of beneficiaries for tea worker allowances. Evidence suggests that nepotism is prevalent in this selection process. Additionally, political affiliations are often leveraged, leading to beneficiaries being selected for various programmes in exchange for voting commitments, while eligible individuals affiliated with opposition parties are routinely excluded. Comparable patterns of nepotism and community-based favouritism have been observed in programmes targeting indigenous communities, where relevant non-governmental organisations, indigenous leaders, and field facilitators exert considerable influence over beneficiary selection.

Irregularities in Verification, Selection, and Beneficiary Allocation: Recipients of the one-time tea worker allowance have been excluded from long-term or monthly allowance and food assistance programmes. Additionally, upazila committee selected the same individuals or families for multiple benefit programmes. There are also allegations of living beneficiaries being misclassified as deceased to redirect assistance. The Upazila Committee often finalizes beneficiary lists without sufficient verification or duplication checks of the preliminary lists from the Union Committee.

2.6.2 Extraction of Bribes in Beneficiary Selection

The beneficiary selection process is marked by widespread bribery. Most of the indigenous applicants were required to pay to secure their selection, while eligible individuals who did not pay were excluded, even after paying multiple times. Ineligible individuals were included in exchange for one-time bribes, with some cases involving multiple payments. This system is based on the collusion among a section of UP members and staff, including village police, and the UP Chairman. In some programmes, part of the Upazila-level officials and staff also coordinated to extort bribes. Bribery was most prevalent in the allocation of housing for indigenous beneficiaries. Those unable to pay were denied rightful allocations, while wealthier individuals received housing through collusion and bribery.

Table 6: Extortion of Bribes in Allowance-Based Programmes

Programme	Allowance (BDT)		Bribe Amount in Selection of Beneficiaries by Programme and Region (One-Time) (BDT)		Additional/ Irregular Withdrawal Charges (BDT)	Person involved in Collecting Bribe
	Monthly Allowance**	Annual Entitlement	Plain Land	Hill	In One Year	
Old Age Allowance (Until Death)	600	7,200	500-10,000	2,500-6,000	200-400	Male and female members of UP, UP Chairman, village police, Union social workers, officers and staff of the Upazila Department of Social Services, MFS agents, intermediaries (brokers)
Widow and Deserted Women Allowance (Until Death*)	550	6,600	2,000-5,000	2,000-4,000	200-400	
Disability Allowance (Until Death)	850	10,200	3,000-10,000	2,000-5,000	300-500	
Mother and Child Allowance (Up to 36 Months from Registration)	800	9,600	2,000-5,000	1,000-2,000	300-500	Male and female members of UP, Union health worker
Tea Worker Allowance (One-Time)	5000	5,000	1,000-2,500	Not applicable	200-300	<i>Panchayet</i> (tea garden workers' council or local committee)

* The beneficiary will be no longer eligible if she gets married again.

** According to the Fiscal Year 2023-24; disbursement is done every 3 months.

Table 7: Bribery in Various Commodity-Based Programmes

Programme	According to the Fiscal Year 2023-24		Bribe Amount in Selection of Beneficiaries by Programme and Region (One-Time) (BDT)		Additional/ Irregular Withdrawal Charges (BDT)	Person involved in Collecting Bribe
	Benefits	Duration	Plain Land	Hill	In One Year	
Food-Friendly	30 kg of rice purchased at a subsidized rate of Tk. 15 per kg	Twice a year; a total of 5 months (ongoing)	2,500-6,000	1,000-6,000	50-100	Male and female members of UP, UP Chairman, village police, food controller assistant, intermediaries (brokers)
VGF	10-30 kg of rice distributed during religious festivals and natural disasters	One member per household (one-time relief)	500-1,000	0	0	
TCB Family Card	2 litres of soybean oil, 2 kg of lentils, and 1 kg of sugar purchased at subsidized prices	One member per household (ongoing)	2,000-3,000	1,000-2,000	50-100	
VWB	30 kg of rice plus Tk. 220 savings contribution	Provided monthly; 2-year duration (free of cost)	2,000-10,000	2,000-6,000	50-200	
Fishermen VGF	4 kg of rice per month	During the fishing ban period (ongoing)	1,500-2,000	0	100-200	
Integrated livestock development programme	7 packages: livestock and construction materials for animal shelters, medicines, and 2-day training	One member per household (one-time)	500-8,000	Not applicable	0	Indigenous field assistants, teachers, administrative officer of Upazila Executive Officer, Male members of UP, UP Chairman, contractor
Development Assistance for Special Areas (Except CHT)	Bicycle, books/ notebooks, pens, stipend	Female Student (one-time)	500-3,000	Not applicable	50-100	
Ashrayan-2 Project	Housing	One member per household (one-time)	7,000-2,00,000	25,000–1,00,000	0	
			Bribes + purchase of construction materials and payment for labourers' food			

2.6.3 Irregularities-corruption in the Benefit Distribution Process

Irregularities in MFS System-based Allowance Distribution: In the MFS system, beneficiaries often fail to adequately protect their personal identification numbers (PINs), which leads to theft and fraud. In all unions covered in the study significant allowance losses due to PIN theft and fraudulent MFS transactions were reported. Additionally, MFS agents regularly imposed unauthorised withdrawal fees of BDT 50 to 100 per transaction under G2P payments. Evidence also suggests that Union and Upazila officials manipulated beneficiaries' mobile numbers to misappropriate allowances.

Delays in Disbursement: Following the death of a beneficiary, relevant authorities significantly delay the disbursement of allowances for the subsequent three months to the nominated successor.

Irregularities in Card and Food Distribution: Food items of poor quality, with some products occasionally spoiled are often distributed in programmes such as Fishermen VGF, VGF, Food-Friendly Programmes, VWB, and TCB Family Card. Rice sacks labelled as 30 kg frequently contain 1 to 5 kg lesser than the stated weight. In the Food-Friendly Programme, benefits assigned to one card are sometimes split between two indigenous families, reducing individual entitlements. For TCB Family Cards, goods intended for one recipient are sometimes given to another.

Beneficiaries often have to wait in line for long periods without receiving goods, and items are occasionally provided to different cardholders if the original recipient is absent. Additionally, some UP members distribute rice to non-cardholders for Fishermen VGF using paper tokens, while legitimate cardholder fishermen do not receive what they are entitled to.

“Michael (pseudonym) is the one who divides everything—like notebooks, pens, stipends, and houses. He’s the local indigenous representative and belongs to the Khasi community. So, naturally, he gives more benefits and opportunities to the Khasi people.”
— *An Indigenous Leader, Sylhet*

Irregularities in Delivering Benefits under Indigenous-Targeted Programmes: In the livestock project for indigenous communities on plain land, contractors have reportedly supplied animals of substandard quality, including some that were diseased. As a result, livestock owned by both beneficiaries and neighbouring households often become infected and die within days of distribution. Although contractual agreements stipulate that contractors must replace animals that die during the quarantine period, this requirement is frequently not met in practice. Additionally, under the Ashrayan project, the constructed houses are often of poor quality, and beneficiaries are commonly required to pay for construction materials and provide food for labourers.

2.7 Accountability

2.7.1 Grievance Redress Mechanism

Central-Level Grievance Redress Mechanism: The central grievance redress system for SSPs is largely inaccessible to indigenous communities because it is based on Bangla and online platform. Limited Bangla proficiency and poor internet access prevent many indigenous individuals from using the system. At the local level, the complaint submission process is disorganised and lacks sufficient oversight, which impedes effective resolution. Many beneficiaries are also unfamiliar with complaint procedures for MFS institutions.

Local-Level Grievance Redress Mechanism: At the local level, Upazila social security implementation officers frequently fail to provide sufficient oversight to prevent irregularities and corruption, often attributing these shortcomings to staff shortages. The regular absence of relevant officials from their offices disrupts monitoring processes, while insufficient cooperation from administrative assistants further impedes accountability. Additionally, officials at the Upazila level tend to disregard complaints.

Of the 22 Unions included in the study, 12 lacked complaint boxes, and 14 lacked complaint registers. Verbal complaints to UP members were typically ignored unless submitted in writing. During beneficiary selection, issues such as bribery, the inclusion of ineligible individuals, or misconduct by authorities led only to verbal warnings from the chairman, rather than formal action. In several cases, beneficiaries were intimidated to deter bribery-related complaints, preventing investigation or redress. Complaints involving political or familial affiliations were also rarely addressed effectively.

“We always live under a system of fear ... I don’t even understand the language properly. When they tried to intimidate me, I didn’t report it to the chairman later.”
— *A widow beneficiary from the indigenous community*

Grievance Redress behaviour among Indigenous Communities: Reluctance to file complaints among indigenous populations remains high, primarily because of significant barriers. These include limited awareness of redress mechanisms, language and geographical obstacles, travel costs, fear of harassment or humiliation, and frequent neglect of grievances by authorities. The inability to submit written or online complaints—exacerbated by limited proficiency in Bengali—further lowers submission rate. Worries about future non-cooperation or retaliation by local representatives further discourage them from lodging complaints.

2.7.2 Monitoring and Evaluation

Despite policy mandates, most SSPs do not consistently publish annual reports. Furthermore, available reports frequently lack comprehensive impact assessments, and the Implementation Monitoring and Evaluation Division (IMED) has conducted only limited programme-specific evaluations.

Oversight deficiencies are evident in different SSPs undertaken for indigenous communities. Project directors, relevant officials, and Upazila Livestock Officers the ‘Livestock Programme for Plains Indigenous Communities’ do not adequately verify the quality of livestock supplied by contractors. Inadequate staffing at the Upazila level also hinders effective project implementation and systematic oversight of socio-economic development activities for indigenous beneficiaries. In the ‘Development Assistance for Special Areas (Excluding Hill Regions)’ project, the UNO and its associated officials do not sufficiently verify the eligibility of recommended indigenous students. Inconsistent monitoring impedes efforts to ensure that educational materials and stipends are delivered to the intended recipients. The UNO and relevant officials failed to properly supervise the construction of Ashrayan-2 housing project. As a result, substandard houses were constructed, and beneficiaries incurred additional costs. The irregular publication of evaluation and progress reports hinders the transparency and accountability of this project.

3 Overall Observation

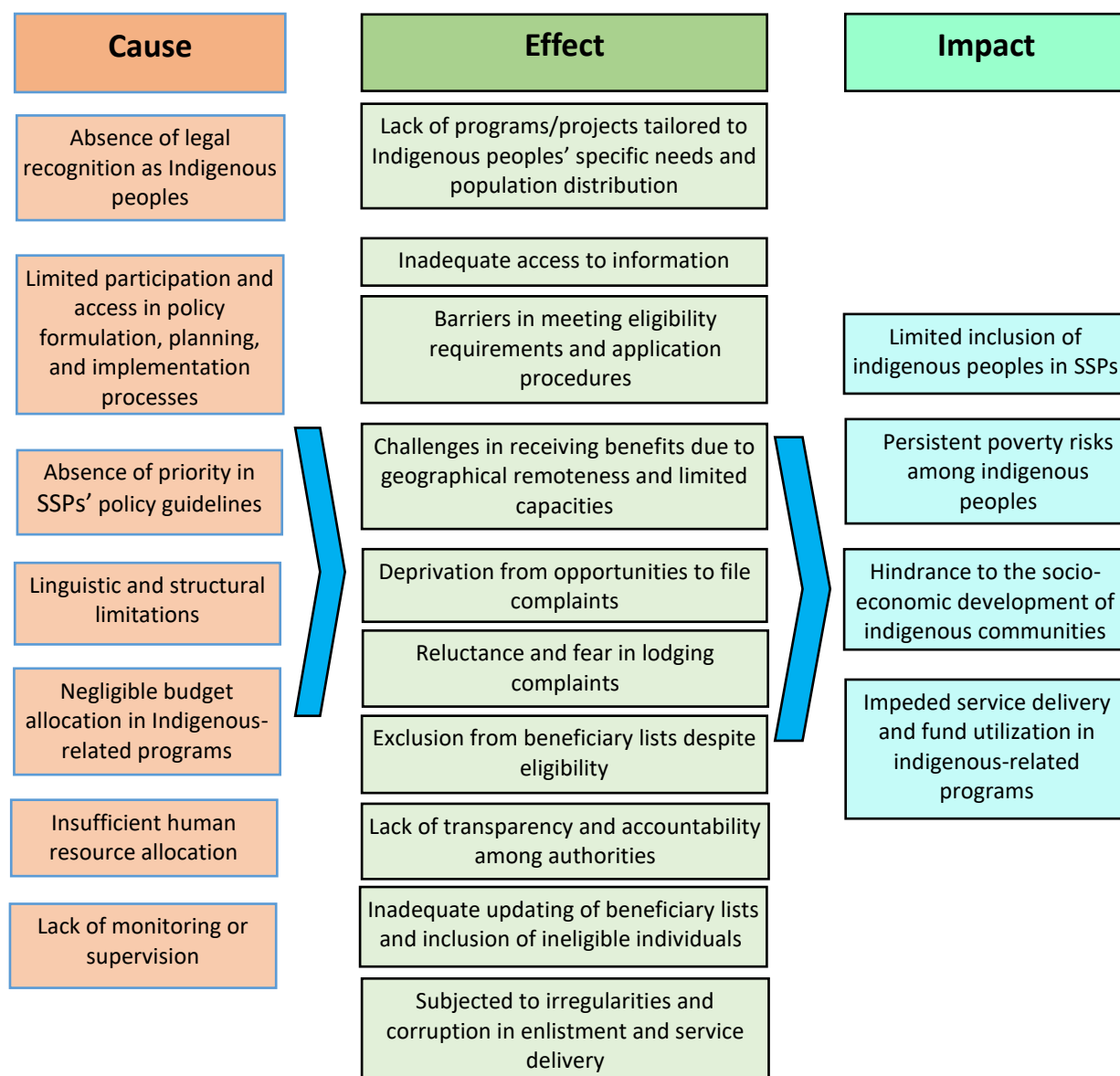
The findings of the study shows that the participation of indigenous communities in the SSPs remains significantly below expectations. Key challenges include insufficient prioritisation within relevant laws and policies; application requirements and documentation procedures that do not accommodate indigenous communities; limited indigenous participation in national and local policy formulation, planning, and budget allocation; failure to design programmes and projects based on indigenous needs and population; and inadequate indigenous representation in programme implementation and grievance-redress mechanisms. Moreover, shortages of qualified personnel and insufficient budget allocations further restrict the inclusion of eligible indigenous individuals. Existing outreach and grievance redress mechanisms are not participatory or accessible to indigenous peoples, resulting in barriers related to language, communication, and access to mobile and internet services. Practices such as bribery, nepotism, political influence, lack of transparency, insufficient accountability, and policy non-compliance throughout all stages of SSPs contribute to structural irregularities and corruption, which place additional burdens on marginalised and vulnerable indigenous communities.

The experiences of indigenous communities from the plains and hill regions regarding inclusion in SSPs reveal both differences and similarities. For indigenous communities in the plains, programme implementation does not sufficiently address their specific needs or social and cultural characteristics. Limited resource allocation and ineffective outreach further restrict their access. Moreover, inadequate indigenous representation among elected officials, widespread irregularities and corruption, reluctance or fear in submitting complaints, low educational attainment and limited technological capacity constitute significant barriers to their participation in SSPs.

On the other hand, indigenous peoples in the Hill Tracts lack access to targeted SSPs and specific budget allocations. Limited awareness of existing programmes, combined with geographical and linguistic barriers, as well as low educational attainment and limited technological capacity, restricts their ability to apply for benefits or file complaints. Additionally, the limited capacity of relevant

authorities to select eligible beneficiaries, deliver services such as food distribution, and conduct effective outreach further impedes their inclusion in SSPs.

Figure 6: Challenges of Indigenous Peoples for Inclusion in SSPs: A Cause–Effect–Impact Analysis



It may be concluded that the absence of prioritisation and special attention for indigenous peoples, despite their status as poor, vulnerable, and marginalised communities, constitutes the most significant barrier to their inclusion in SSPs.

3.1 Recommendations

Based on the findings and analysis, the following recommendations are intended to enhance the inclusion of Indigenous peoples in SSPs in Bangladesh.

3.1.1 At Policy Level

1. The government should ratify ILO Convention 169 to ensure that Indigenous peoples in Bangladesh receive constitutional recognition and fair entitlements to their rights across all sectors, including social security.
2. At the central level, the representation and participation of indigenous peoples from both plain and hill regions should be ensured in the planning and formulation of social security policies.

Implementation guidelines must explicitly prioritise the needs of indigenous peoples and allocate sufficient budgetary resources to support their inclusion.

3. Programmes should be developed and implemented that are culturally and contextually appropriate for indigenous communities in both plain and hill regions. These initiatives should include livestock, income-generating, and training components tailored to the specific cultures, needs, and circumstances of these communities.
4. The number of beneficiaries and budget allocations in ongoing programmes for indigenous communities in plain land should be expanded, with adjustments based on the demonstrated needs of the population.
5. All SSPs should ensure that poverty criteria are properly applied, update the list of eligible beneficiaries in each Union annually, and explicitly include Union-based allocations for indigenous peoples in programme guidelines. At least one mandatory live verification should be conducted each year to update the beneficiaries' lists.

3.1.2 At Implementation Level

6. Application processes for SSPs, birth registration, national ID attainment and correction, and other document-related procedures should be simplified and adapted to be more accessible and responsive to indigenous peoples.
7. In regions inhabited by indigenous peoples, all critical information regarding programmes and grievance redress mechanisms must be communicated in the relevant indigenous languages. Information should be disseminated regularly using public address systems, hand microphones, courtyard meetings, billboards, digital displays, and chart presentations at both Union and Upazila Parishads.
8. Active participation of indigenous communities in the planning and implementation of programmes within their territories is essential. Local committees must include at least two representatives nominated by indigenous communities, ensuring that at least one of them is a woman.
9. UPs must implement targeted measures to include indigenous persons with disabilities from marginalised and hard-to-reach areas in the Disability Information System (DIS) and ensure their registration.
10. In hilly and remote Union areas where electricity, internet, and UDC servers are non-functional, alternative provisions must be established to enable indigenous peoples to apply for all SSPs offline or through direct submission.
11. Oversight by MFS institutions must be strengthened to prevent irregular overcharging by MFS agents during the withdrawal of social security allowances by indigenous individuals. Furthermore, culturally appropriate awareness campaigns should be implemented to address fraud and misuse within the G2P payment system.
12. In remote Union areas of the hill regions, distribution of allowances and food items, especially rice, should be based on verified needs and dietary habits of indigenous peoples. Transportation funding should be allocated for rice distribution, and demand-driven cash transfers should support this effort. Distribution should be scheduled quarterly. Establishing food banks in remote hill areas is also recommended.
13. Legal action should be taken against individuals involved in irregularities and corruption within SSPs. Awareness campaigns should be conducted to inform local indigenous beneficiaries about these measures. Oversight by local civil society organisations should also be strengthened.
14. Relevant ministries should establish a Unified Registry and an effective mechanism for grievance redress. Maintaining a grievance register at local offices should be mandatory, and guidelines should provide clear instructions to ensure prompt recording and resolution of oral complaints. Furthermore, indigenous people-friendly complaint submission systems should be implemented.
