



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 11/10/2020 | Report No: ESRSC01692



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Cambodia	EAST ASIA AND PACIFIC	P174335	
Project Name	Cambodia General Education Improvement Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	7/20/2021	10/29/2021
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective

To improve general education quality in target areas, and to provide immediate and effective response in case of an eligible crisis or emergency.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>60.00</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

GEIP, aiming at improving general education quality in target areas, and to providing immediate and effective response in case of an eligible crisis or emergency, supports the main education reform programs as stated in ESP 2019-23 from kindergarten to grade 12 (K-12) by combining the financing from the International Development Association (IDA) and Global Partnership for Education (GPE). Specifically, GPE financing supports main activities in early childhood education and primary education sub-sectors, while IDA financing supports those activities in secondary education sub-sector.

The project is comprised of three components. The first component supports the implementation of school-based management (SBM) to the targeted pre-primary, primary and secondary schools; provides in-service training to



teachers and school leaders; and improves equitable access and quality of education to meet school effective minimum standards by constructing and renovating classrooms, e-learning classrooms, laboratories, teachers' houses, and buildings at teacher training centers. The component also pilots the skills programs in some high performing secondary schools to help students learn income-generating skills to support their living and increase their opportunities for higher education enrollment, and some innovative education technology (EdTech) will also be introduced to support for student learning outcomes. The second component aims at making the whole education system work for student learning by improving sector performance-based policy and evidences, and strengthening monitoring and evaluation (M&E). The day-to-day implementation, coordination, and management of project activities on financial management, procurement, supervision and reporting, internal and external audits, environmental and social safeguards management, and monitoring and evaluation will be also the main activities under this component. The third component is to allow for the reallocation of financing in accordance with the IDA Immediate Response Mechanism in order to provide an immediate response to an eligible crisis or emergency, as needed. Learning from the lessons of the current COVID-19 pandemic, the project will develop Emergency Response Manual (ERM) and other necessary documents to ensure that CERC can be activated at any time during the emergency.

#### D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The proposed project is nationwide. It will be implemented in Cambodia's 25 provinces and 162 districts, focusing on improving 213 pre-primary schools, 1,000 primary schools, and up to 500 secondary schools. The project thus targets big cities such as Phnom Penh and Siem Reap, as well as rural towns and small villages, including remote areas. With a population of approximately 16.7 million, it is estimated that 97 percent of Cambodians are Khmer ethnicity. The remaining 3 percent is composed of Cham, Vietnamese, and Chinese ethnicities and approximately 1.25 percent are divided between twenty-two indigenous ethnic minority groups also called "Khmer Loeu" or "hill tribes" who are ethnically non-Khmer. These groups are estimated to comprise around 184,000 persons and constitute about 1.25 percent of the Cambodian total population. Indigenous peoples are found in 15 of Cambodia's 25 provinces.

The geographic area will include north-eastern provinces, which has lush forests and abundant biodiversity encompassing rolling hills, plateaus, mountains, lowland watersheds, and crater lakes. These areas are also home to significant number of Indigenous Peoples where there are substantial gaps and disparities in poverty and quality of education. With further assessment during the pre-appraisal mission, there may be increase in the number of secondary schools to 500; expanded investment in improving teacher training institutions; extended scope of skills development program and e-learning equipment/programs in selected secondary schools.

Cambodia has a variety of landscapes, including popular coastal towns, ancient temple sites, flat agricultural areas, remote forests and mountainous areas. While some urban areas are easily accessible by road and comprise mainly ethnic Khmer – like Phnom Penh, Siem Reap and Battambang, among others – many areas in Cambodia remain prone to flooding and cut-off from roads, schools and hospitals, or are otherwise remote. The more remote areas tend to be where there is more likelihood of the presence of Indigenous Peoples, though Indigenous Peoples are found in 15 of Cambodia's 25 provinces.



Cambodia’s population is still mostly rural based (76% in 2019) and it remains one of the poorest countries in the Southeast Asia region. Nearly a third of the population still lacks access to improved sanitation, a fifth to improved water and school completion rates are still low. There are vast differences between life in Phnom Penh, other urban areas and rural areas, with rural areas having the lowest indicators for access to water, electricity, sanitation, school attendance, etc. The project therefore needs to ensure it is implemented with careful consideration of the differences of social environments depending on the project province or district where the project is being implemented.

The project activities will help contribute to address the gap in equitable access to quality education services facing Cambodia through improving school-based management, providing training and upgrading the qualification of teachers, constructing, rehabilitating and renovating school facilities, supporting the development of sub-sector strategies and improving monitoring of core reforms in the education sector. The project will also support the purchase of necessary equipment for students with disabilities, address violence inside and outside schools, and pilot skill development programs for poor students in secondary schools.

#### D. 2. Borrower’s Institutional Capacity

The Cambodia General Education Improvement Project (GEIP) follows the implementation model of the ongoing Secondary Education Improvement Project (SEIP). Hence the proposed operation will be implemented by existing institutional structure, which has National Level Project Management Team (PMT) comprising the project director who directs the project and a project manager who will be overseeing day-to-day project implementation, coordination and compliance, and Ministry of Education, Youth and Sports (MoEYS)’s departments. At the provincial level, the School Management Committees (SMCs) and the provincial/municipal Department of Education, Youth and Sports provide on the ground support from construction to project operation (School Based-Management/SBM). The construction supervision work, however, will be again commissioned to the Department of Construction of MoEYS. This would be confirmed at the appraisal stage. Project Management Committee (PMC) comprising MoEYS leaders, including Secretary/Undersecretary of State will be the highest level and responsible for decision making during implementation.

Though the PMT/MoEYS has considerable experience in the implementation of several World Bank financed projects (GPE-2, SEIP and Higher Education Improvement Project/HEIP) under the safeguards policy, the engagement of the safeguard focal persons in the past projects was very limited and the monitoring and reporting of safeguards compliance has room for improvement. Moreover, the PMT/MoEYS does not have any experience in the Environmental and Social Framework (ESF) preparation and implementation. The proposed project will be its first time to apply the ESF.

As a result, the PMT/MoEYS as the implementing agency plans to establish the ESF responsible unit, with assigned focal persons in relevant departments being officially placed under the PMT (as per the “Minutes of ESF discussion with PMT dated September 01, 2020”). Considering the fact that the World Bank’s ESF is new to PMT/MoEYS, capacity support will be provided to relevant staff at PMT/MoEYS as needed and a training plan will be included as part of the commitments in the project’s Environment and Social Commitment Plan (ESCP).

## II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

### A. Environmental and Social Risk Classification (ESRC)

Substantial



**Environmental Risk Rating**

Moderate

The environmental adverse risks and impacts that the proposed project will encounter are site specific, temporary and reversible and readily mitigatable. These potential risks and impacts are associated with activities under Component 1, including construction/renovation of small infrastructure development. Special attention should be paid to the implementation of appropriate mitigation measures and monitoring. Additional attention is also needed because of the potential presence of Indigenous Peoples living in and around the selected landscapes and protected areas.

The project will be covering nationwide, both in existing urban communities and some remote locations. Prior to the start of civil works, specific locations for the buildings will be determined through a consultation process. The facilities, however, will not be financed if they are located in sensitive natural critical habitats or protected areas. The potential locations will either be in the existing school's land and/or land owned by Ministry of Education, Youth and Sports (MoEYS)/local authority. For the purpose of civil works, all locations will be identified and verified through environmental and social screening, which include consultations. This practice has been applied in the ongoing SEIP project.

The project will invest in civil works at moderate scale and low intensity, including rehabilitation of existing buildings, construction of new five-classroom buildings, and teachers' accommodation. The standard design and construction specifications were developed by the MoEYS's department of construction and applied throughout the country. The classroom building is typical ground floor (or two stories) concrete and brick-made (3-5 classrooms), tile roof, and with separate latrines for male and female kids. The universal design is considered, for example the provision of wheelchair ramp.

Each school premise will be protected by concrete/wooden fences, with main gate often faced to community roads. As such, the investment may increase traffic load during peak hours. However, as being practiced nationwide, traffic facilitation was provided by schools and local police at the start and the end of class hours. During the construction, some temporary, localized, adverse environmental impacts of minor to moderate scale would be expected. These are likely traffic disturbances from transport of materials, disturbances to small shops and residences near the construction site, dust, noise, impacts from earth work, and construction waste burning. These impacts could be simply managed by applying good construction practices. At this stage, Environmental and Social Management Framework (ESMF) which include the generic Environmental and Social Management Plan (ESMP) will be developed for the project. E&S screening will be carried out during site selection. The ESMF will cover relevant Environmental and Social Standards (ESSs), environmental and social screening, chance finds procedure, waste management, occupational health and safety (OHS), community health and safety, Labour Management Procedures (LMP), and generic ESMP. During the operation stage, building on the SEIP project experience, the PMT will expand tree plantations, greenfield, and sitting areas, which would reduce heat and carbon emissions.

Although the World Bank's ESF is new to them, PMT/MOEYS has had safeguards experience through the SEIP project and shown commitments to manage risks and impacts throughout this project. To ensure compliance, the responsible ESF unit would be established under the PMT structure. This will be reassessed and confirmed at the appraisal stage. Capacity development will be provided to engineers and ESF focal persons as needed. The ESF unit will be made aware of the ESMF and will continue to educate the communities and relevant stakeholder before and/or during the construction.



**Social Risk Rating**

Substantial

While the project focuses on expanding activities implemented under SEIP and is expected to have significant social benefits by improving education in target areas, the social risk is classified as Substantial, given institutional capacity to manage risks and impacts in a manner consistent with the ESF, and the magnitude and scale of GEIP activities as it targets every district in the country. These new activities when compared to SEIP represent additional, though largely manageable and site-specific risks, on child protection, Violence Against Children (VAC), occupational health and safety, labor, and Gender-Based Violence (GBV), mainly during construction.

There are also risks from the project related to inclusion, such as the exclusion of certain groups from project benefits, especially those that may live in more remote locations, like indigenous peoples. It will be important for the project to ensure that there is access to project benefits for all groups, including households who are poor, children with disabilities, indigenous groups and other vulnerable students. Online education activities also carry a number of social risks, in particular relating to child abuse and Sexual Exploitation and Abuse (SEA). While it is expected that all construction will take place on land owned by MoEYS, there could be minor potential impacts as a result of land acquisition or restriction to land/assets. Most project activities (such as training and consultations) also carry risks relating to COVID and child protection, and safety precautions will need to be in place when conducting trainings, consultations, and constructions works.

**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1. General Assessment**

**ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

**Overview of the relevance of the Standard for the Project:**

All districts and provinces in Cambodia will be included in the proposed project. The proposed project will scale up the implementation of an ongoing SEIP by including two more sub-sectors, namely early childhood education (ECE) and primary education and increasing the number of schools and districts.

Secondary schools will be selected by the project based on a set of criteria and set to balance the numbers of big, medium and small schools. Inclusion of various sizes will help produce lessons for the scale-up. The criteria include distance to the district centre, number of students, student-teacher ratios, number of classrooms, and conditions of school buildings. At the first tier, all the main schools, with large number of students from grades 7 to 12, low student-teacher ratios, and close to the district centre, in 203 districts are selected in addition to the schools under SEIP’s support. The second tier is for the schools with the national average in terms of the above-mentioned criteria, while the third tier is for the disadvantaged schools with low number of students, high student-teacher ratios that indicate shortage of teachers, poor conditions of infrastructures, and far from the district centres. As for primary schools, the selection follows the criteria for the secondary school selection. However, it is more efficient to have targeted primary and secondary schools are near each other. As for pre-primary schools/pre-schools, the project will include all the public separate pre-schools of around 213 pre-schools.

A proposed 500 schools will be built in 25 provinces, some of which will only require renovation. The MoEYS’s school standard design and technical specification for new buildings and the teachers’ accommodation will be applied. GEIP follows the SEIP’s footprint in terms of site selection and E&S screening, building design, community ownership to



construction and management of building, and SBM. The project is being designed through a consultative process, including the determination of the locations.

However, PMT confirmed that no school buildings will be financed if the locations are found to be near or within national parks; biodiversity conservation areas; Physical Cultural Resources (PCR); and/or forest cover. The potential locations will either be in the existing school's land and/or land owned by Ministry of Education, Youth and Sports (MoEYS)/local authority. For the purpose of civil works, all locations will be identified and verified through environmental and social screening, which include consultations.

The physical footprint of the proposed operation is expected to be site specific, temporary and reversible. The potential impact may include noise, dust, construction waste, storage of materials, possibility of cutting/trimming trees/branches, minor earth removing and backfilling works, Unexploded Ordnances (UXOs) to be cleared ahead of the civil work. The likely risks from the civil work activity are mainly during the construction. These may include dust and noise from concrete mixing and use of machineries and earth work; construction waste burning and improper storage of construction waste and construction materials. Impacts at the operation stage is expected to be minor. Also, attention should be paid to the health and safety of workers at work, camp site, access to water and sanitation, and COVID-19 preventive measures to be presented by community/school before starting the civil work. In all, civil work impacts are site specific and reversible. During the operational stage, it is expected that solid waste (mostly municipal solid waste from kitchen) will be generated from the school food and drink shops in and around the campus. There could be negative impacts if proper waste storage and collection services are not effectively implemented. Implementation of SEIP's Standard-8 (school friendly environment, in which waste storage and segregation is included) will help improve the situation. These matters will be incorporated in the Environment Social Commitment Plan (ESCP) and ESMF (generic ESMP). Learning from the experience of other Bank financed projects, an ESMP booklet for managing simple construction activities (including construction waste management) would be developed during project implementation. The booklet would also draw lessons learned from SEIP and other previous education projects. The ESF responsible unit will be established under the PMT. Staff will be trained during project preparation and implementation. For the long-term capacity development, the PMT would send staff for dedicated training on environmental and social risk management related subjects.

Social risks from the project during construction include the influx of labour force, particularly in small or remote communities where skilled labour may not be available, though this may be minimized by hiring local labour. The project will need to ensure there is equitable opportunities for unskilled labour (i.e. unskilled jobs made available to women at the same pay as men, that jobs are inclusive of indigenous peoples, the poor and vulnerable groups), that there is no child labour, that suitable worker's camps are set up (if needed), that appropriate precautions to prevent COVID are taken for both workers and the nearby community and that risks of GBV/SEA/VAC in the workforce and the community are well managed. The level of risk will likely be associated with the extent of the labour force as well as with the remoteness of the community – a remote community with an outsider labour force may be more vulnerable to risks from COVID as well as GBV. An assessment of these risks will need to be made as part of the Environmental and Social Assessment (ESA) which will inform the Environmental and Social Management Framework (ESMF), including the Labour Management Procedures (LMP). There are also safety risks during construction, in particular for children.



The construction work will take place in existing school buildings and/or school land areas owned by MoEYS. E&S screening will take place to make sure it is on MoEYS's land. Nevertheless, since the exact location of project construction is not known, a Resettlement Policy Framework (RPF) will be developed in the event of land acquisition impacts.

A Stakeholder Engagement Plan (SEP), including a Grievance Redress Mechanism (GRM), will also be developed to ensure all interested parties, beneficiaries and affected communities (i.e. students, disadvantaged groups, women's organizations, disabled peoples' organization, local authorities, educational community, Indigenous Peoples' groups) are engaged, especially in project design options in compliance with Environmental and Social Standard (ESS10).

While the project is expected to significantly benefit target communities, there are also social risks concerning social inclusion, particularly of disadvantages groups (such as people living with disabilities, the poor and indigenous students) to ensure they can access project benefits. The assessment of these risks, through a social assessment, and suggested steps to maximize project benefits should feed into the preparation of the ESMF, SEP and Indigenous Peoples Planning Framework (IPPF).

An ESCP will be developed to ensure that the relevant ESF instruments are prepared as part of project design and implemented.

Learning experience from the response to the COVID-19 pandemic, the Contingent Emergency Response Component (CERC) is embedded in the project design, which the Emergency Response Manual (ERM) and other necessary documents will be developed to ensure that CERC can be activated at any time during the emergency. The CERC activities are expected to be similar to the main project activities. Hence, no material changes to the environmental and social risks and impacts are anticipated.

All instruments will be disclosed and consulted upon prior to project appraisal.

**Areas where "Use of Borrower Framework" is being considered:**

The client's E&S Framework is not proposed to be relied on for this project, in whole or in part. However, as relevant and consistent, national legal framework and legislation can be referred to and recognised.

**ESS10 Stakeholder Engagement and Information Disclosure**

An initial mapping has identified as project stakeholders local authorities, development partners working on education/education community, communities where target schools will be/are situated, children and families of target schools, teachers and principals in selected schools, construction workers, indigenous peoples in selected locations, and a special focus on those who are deemed disadvantaged in their access to general education services (students from poor background, those living in remote areas, disabled, indigenous students). These stakeholders will need to be further defined as project components are determined and consultations take place. Project beneficiaries are expected to be students as well as teachers in the targeted schools.

MoEYS will prepare the SEP before the appraisal stage. The SEP will ensure that beneficiaries and affected communities will be engaged, especially regarding project design (target communities/schools) as well as to ensure all project stakeholders can access project benefits (in particularly vulnerable groups such as indigenous peoples, the



poor and people with disabilities), so that GEIP activities are developed and designed in a way that helps to address the challenges in equitable and quality access to general education services. The approach to engagement activities will consider the needs of indigenous peoples, vulnerability, language and literacy to ensure not only risks are managed but benefits are accessible to all. The RPF and the IPPF will include specific engagement requirements to reach out to stakeholders to ensure accessibility and culturally-appropriateness. The SEP will include a Project Grievance Mechanism that will allow any stakeholder to submit questions, complaints or feedbacks about the project. Special attention will be paid to making sure that the most vulnerable groups (ethnic groups, women, vulnerable households) are informed of the existence of this mechanism from an early stage of project preparation. The project's social assessment will also consider measures on how the GRM can receive and refer sensitive issues such as SEA/GBV/VAC. As part of the information disclosure arrangement, the assessment, SEP, ESMF and SEP will be disclosed publicly in the MoEYS website. The meaningful consultation with relevant stakeholders will be undertaken before appraisal and results adequately recorded and disclosed.

The SEP will be implemented, updated and disclosed by MoEYS as appropriate throughout project implementation.

## **B.2. Specific Risks and Impacts**

**A brief description of the potential environmental and social risks and impacts relevant to the Project.**

### **ESS2 Labor and Working Conditions**

Labour practices in Cambodia are governed by the Labor Law (1997), which includes provisions on health and safety in the workplace and non-discrimination in employment and wages. The ESMF will include an LMP, including Worker Grievance Procedure, to identify and address any gaps between the national law and ESS2.

Project workers include MoEYS staff and their consultants working directly for the Implementing Agency, including those individuals or institutions delivering trainings (direct workers); employees of civil works contractor and subcontractors (contracted workers), and primary supply workers (e.g., providers of construction materials). Teachers and other stakeholders benefiting from training, mentoring and other capacity building are considered project beneficiaries, not project workers. Moreover, it is likely that GEIP will adopt SEIP's model of management of construction works, in which local community together with school management are tasked to supervise work, and local-based laborers are hired (contracted workers). The LMP will need to ensure there is equal opportunity for jobs, in particular for unskilled labour, and that women and other vulnerable community members are encouraged to apply to jobs in civil works. The LMP should ensure jobs provide equal pay regardless of the sex of the worker and that the needs of women workers are taken into account to provide a safe working environment (such as different sex toilets in working sites).

Since the national Labor Law defines 12 years old as the minimum working age, a specific provision on minimum working age in line with the ESF (i.e. 18 years) will be included in the LMP and bidding documents to ensure no persons under 18 years are hired by the project.

The LMP will also need to take into account the latest COVID-safe guidelines mandated by the government and/or best practice in the country, in order to maintain a safe working environment for workers and for the community and



minimize the risk of COVID transmission. This should include hygiene practices, use of PPE and ensuring sick workers can self-isolate and access pay.

Given that project works will mostly take place at existing schools, there are also child protection risks (safety and VAC) which will need to be managed. The LMP will include Codes of Conduct (CoC) for workers with respect to child protection (as well as GBV/SEA) and training to workers before/when they commence employment to ensure that they fully understand their commitments under the CoC and their expected behaviour.

The LMP will also include requirements on OHS procedures that contractors need to prepare, implement and monitor on all construction sites for ensuring basic safety around work sites (including measures addressed at protecting children since work sites will be at/near schools), use of personal protective equipment, and training and awareness education for workers (on safety, child protection, GBV/SEA/VAC, COVID, grievance redress, etc.). The contractor will develop a dedicated worker grievance mechanism for direct and contracted workers so that they can address any issues, and MoEYS will monitor this.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

The project (the civil works) will generate minor pollution to air, water, or land. But they will be temporary and reversible. It will not involve in activities or impacts that would consume finite resources that may threaten people, ecosystem services and the environment even at local level. The activities will generate minor quantities of solid waste, which will be managed by the good waste management practices embedded in the generic ESMP at the construction stage, and be covered by Standard-8 at the operational stage). Requirements for solid (and wastewater) management will be spelled out in the ESCP and the ESMP. With regards to the risks of asbestos materials, the Bank's practice note (2009) will be applied.

### **ESS4 Community Health and Safety**

Given that construction/civil works will take place within the compound of existing schools, there are potential risks to health and safety of the community, in particular children and women. These include risks associated with construction, traffic safety for school attendees as well as other pedestrians, communicable diseases (COVID, HIV/AIDS), risks of GBV/SEA, safety risks to children who may play or gather close to construction sites, and risks of VAC whether through physical, verbal or sexual abuse. Poor families, children with disabilities and indigenous communities may face enhanced risks and the ESMF will need to take this into account. The ESMF will include measures to ensure the careful management of risks, including through the LMP (mentioned above), as well as through close consultations with communities and the school in the SEP, as well as clear procedures and institutional responsibilities to help minimize community conflicts and misunderstandings. Some risks may be minimized by hiring local labour as well as by engaging the school community in the management of safety and other risks to children.

Additional risks may be posed through the online education component of the project, in terms of VAC/SEA and this will need to be managed through appropriate training and information tailored to students, parents and teachers in terms of what is appropriate online behaviour and what could pose online risks, as the students and parents may not be familiar with potential online risks (bullying, child grooming, exploitation, etc.). These risks may also be enhanced for poor families and Indigenous groups who are likely to be less experienced in the use of online platforms.



It will be important for the social assessment to also consider additional interventions that could improve the education system and help the project achieve its objectives. Among others, it will be helpful for the social assessment to look at areas where teachers and school administrators may benefit from additional capacity building, such as in raising awareness of SEA/GBV/VAC risks in schools as well as in the online component, how to address bullying in school or children victim of domestic violence, or other issues that may be affecting attendance and performance.

### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

While most of the construction works are expected in existing school buildings, some new schools/facilities will be built. Location for new school buildings will be in existing schools or MoEYS government land, and this will be verified through a process of social screening. However, for cases where screening may find the potential for land acquisition impacts, an RPF will be developed to ensure that any land acquisition impacts can be properly mitigated. The RPF will include screening criteria for land acquisition impacts, as well as detailed steps that would be taken to develop Resettlement Plans if any impacts are expected during project implementation. The Ministry of Economy and Finance's (MEF) General Department of Resettlement (GDR)'has developed a Standard Operating Procedures (SOP) for Land Acquisition and Resettlement which is broadly in line with ESS5, though some aspects need to be strengthened in order for it to be fully aligned, including guidelines on voluntary donations. The RPF for the project will therefore follow the guidelines of the SOP but ensure it meets all the requirements of ESS5 and will include a gap analysis of the SOP against ESS5 to ensure screening meets ESS5 requirements. GDR will be consulted and engaged from early on so they can discuss their role and support provided to MoEYS in the preparation of the RPF.

### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The project will not finance renovation or construction activities that could provide access to or lead to deterioration of natural streams, critical natural habitats, wildlife sanctuary, protected areas and/or scared resources. The construction of the school buildings and teachers' accommodation and renovation of existing buildings will only take place in the existing school premises, and residential or commercial areas that are already developed. However, it is expected that, because some areas may be prone to floods, some buildings may require leveling up (backfilling) using aggregates, soil or construction debris that are available in the market as the primary source of backfilling materials. Contractors/communities are not permitted to access to or use materials from nearby natural streams, biodiversity conservation, or protected areas that serve as ecosystem services for the living natural resources. These risks and impacts will be incorporated in the ESCP, and addressed through ESMF, and the proposed ESMP booklet.

### **ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

GEIP activities are nationwide, and will have impacts on indigenous peoples, whose populations spread across 15 of Cambodia's 25 provinces (Ratanakiri, Mondulhiri, Kratie, Preah Vihear, Kampong Thom, Stueng Treng, Odar Meanchey, Kampong Cham, Pursat, Battambang, Kampong Speu, Koh Kong, Bantey Meanchey, Sihanouk, Siem Reap). However, provinces with high concentration of indigenous peoples include Mondulhiri, Ratanakiri and Stueng Treng.



Project activities in areas where indigenous peoples are present must ensure that they are consulted in a culturally appropriate manner and have opportunities to benefit from the project activities. In addition to this, in order to ensure that indigenous peoples communities are not disadvantaged in accessing project benefits due to language or culture, the SEP will include measures to engage and consult with them.

While the project is not expected to negatively impact indigenous peoples, it is important that these groups can benefit from enhanced access to education through construction of school buildings, teacher houses, improved school-based management/governance and improved quality of teachers, among others. Given the fact that indigenous groups have been considered marginalized in terms of their access to general education compared to the Khmer, it is important to ensure that a proper social assessment and inclusion strategy is developed to make sure indigenous groups can access project benefits. For instance, the social assessment conducted in 2016 for the existing SEIP informs that many indigenous students dropped out of school in grade 6, as they could not afford to continue their study due to the long distance from the lower secondary school to their village. Poverty is also a major barrier to their access to education. The new social assessment that will be prepared for this project will inform the IPPF, through identifying issues and barriers that indigenous groups may face in accessing project benefits and propose measures to ensure that indigenous students can in fact benefit. It will be important for the Social Assessment and Stakeholder Engagement plan to inform project activities so that they are designed with sensitivity to the cultural and linguistic barriers to education attainment and include measures aimed at reducing inequality in educational outcomes in predominantly ethnic areas. The project activities should also include design of training modules that are suited to teaching in the context of language and cultural differences. There is also a need to ensure indigenous peoples contribute to project design and decisions, including providing feedback, and this will be managed both through the IPPF that will be prepared and the SEP. The IPPF will also include a methodology for screening for the presence of ethnic groups in the area of project influence, to assess the expected direct or indirect social risks they may face, as well as identify measures to ensure access to project benefits.

### **ESS8 Cultural Heritage**

The school buildings, teachers' accommodations, etc. will be constructed on the land that belongs to school or the provincial department of education, youth, and sports. The land will be screened to ensure that it is free of PCR, and secured for the GEIP objectives. There are potential risks that tangible cultural heritage may be found on the land or in close proximity as a result of conversion, construction or renovation. PMT will ensure that a provision of chance-finds procedure should be included in the ESCP and ESF instruments. In addition, the environment and social screening form will cover PCR as well as Unexploded ordnance (UXO).

### **ESS9 Financial Intermediaries**

This standard is currently considered not relevant. The project will not make use of or support financial intermediaries as defined by this standard.

## **B.3 Other Relevant Project Risks**

All risks have been captured under each relevant standard.



**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?** No

**Financing Partners**

Global Partnership for Education (GPE)

**B. Proposed Measures, Actions and Timing (Borrower’s commitments)**

**Actions to be completed prior to Bank Board Approval:**

- Social Assessment
- Development of Environmental and Social Management Framework (ESMF) - This will include an environmental assessment and development of several documents: Labour Management Procedures and Worker Grievance Procedure, Resettlement Policy Framework, Chance Finds Procedure for Physical Cultural Resources (PCR), Indigenous Peoples Planning Framework, and Emergency Response Manual (ERM)
- Development of Stakeholder Engagement Plan (including Grievance Redress Mechanism)
- Development of Environmental and Social Commitment Plan (ESCP), including a training plan for capacity building of MoEYS staff in the management of environment and social risks and compliance with the WB ESF

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

All instruments are expected to be prepared, disclosed, consulted upon, and finalised during preparation. In addition, since it is the first time for PMT/MoEYS to apply the Environmental and Social Framework (ESF) in project preparation and implementation, the ESCP will include dedicated activities in relation to awareness raising, training and capacity building, and operationalization of the plans and procedures.

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS** 15-Mar-2021

**IV. CONTACT POINTS**

**World Bank**

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Public Disclosure



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**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s):	Simeth Beng
Practice Manager (ENR/Social)	Mona Sur Recommended on 04-Nov-2020 at 14:58:27 GMT-05:00
Safeguards Advisor ESSA	Nina Chee (SAESSA) Cleared on 10-Nov-2020 at 14:37:46 GMT-05:00