

ENVIRONMENT AND SOCIAL MANAGEMENT FRAMEWORK

FOR

**BANGLADESH COVID 19 SCHOOL
SECTOR RESPONSE PROJECT**

(P174268)

DIRECTORATE OF PRIMARY EDUCATION

MINISTRY OF PRIMARY AND MASS EDUCATION

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Abbreviations

CDC	Center for Disease Control and Prevention
DoE	Department of Environment
DPE	Department of Primary Education/ Directorate of Primary Education
ECA	Environmental Conservation Act
ECR	Environmental Conservation Rule
EHS	Environment Health and Safety
EHSG	Environment Health and Safety Guideline
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESCoP	Environmental and Social Code of Practices
ESMC	Environmental and Social Management Committee
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRC	Environmental and Social Risk Classification
ESS	Environmental and Social Standards
GA	Grant Agent
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GoB	Government of Bangladesh
GPE	Global Partnership for Education's
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IEE	Initial Environmental Examination
IPF	Investment Project Financing
LEG	Local Education Group
LMP	Labor Management Procedure
M&E	Monitoring and evaluation
MoE	Ministry of Education
MoEFCC	Ministry of Environment, Forest and Climate Change
MoHFW	Ministry of Health and Family Welfare
MoL	Ministry of Labor
MoPME	Ministry of Primary and Mass Education
MSDS	Material Safety Data Sheet
NGO	Non-Government Organization
NHP	National Health Policy
OHS	Occupational Health and Safety
PD	Project Director
PDO	Project Development Objectives
PIU	Project Implement Unit
PPE	Personal Protective Equipment
SECDF	Small Ethnic Community Development Framework
SH	Sexual Harassment

SEP	Stakeholder Engagement Plan
SHED	Secondary and Higher Education Division
SMC	School Management Committee
SOP	Standard Operating Procedure
SSRP	Safe School Re-opening Plan
TA	Technical Assistance
UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific and Cultural Organization
WASH	Water, Sanitation and Hygiene
WHO	World Health Organization
SOP	Standard Operating Procedures
WB	World Bank

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Executive Summary

The COVID-19 pandemic is causing profound disruptions in health and socio-economic sectors to countries across the world. In addition, the education systems have also been severely affected due to the pandemic. In Bangladesh, schools and education institutions have been closed for around a year - since March, 2020 and increasing the learning gap, dropout rates, learning inequality, disrupts health and safety of student, early marriage incidence, adolescent fertility, child labor, escalate GBV/SH etc. The Bangladesh COVID-19 School Sector Response (CSSR) Project will help Bangladesh tackle the learning challenges posed by this pandemic. The World Bank Group was selected as the Grant Agent (GA) for processing and supervising the proposed grant through the consensus of the Government of Bangladesh (GOB) and the Local Education Group (LEG). Directorate of Primary Education (DPE) under the Ministry of Primary and Mass Education (MoPME) implement the TA project in collaboration with Secondary and Higher Education Division (SHED) of Ministry of Education (MOE). The overarching development objective of the project is to (i) strengthen the basic school system's institutional capacity to respond to, and recover from, the COVID-19 crisis; and (ii) build resilience to face future crises from pre-primary to secondary levels.

The CSSR Project will provide Technical Assistance (TA) for further development of the remote learning system, communication campaigns, school re-enrolment activities after COVID-19 pandemic is over, disinfection of schools before classes can resume, teachers' professional capacity development and monitoring and evaluation (M&E) capacity building. School premises and classrooms will be disinfected, sanitization/hand washing facilities will be installed including health screening provisions.

The major source of environmental concern will emanate from the use of disinfectant. Improper selection, use and disposal of such disinfectants might impact the physical environment, affect health and safety of the workers and communities living near the schools. The anticipated social risks will mostly be associated with exclusion of certain school going student who are from poor, vulnerable and marginalized groups in the society will be out of reach and disengaged with learning activities, which will create gap in accessibility to learning opportunities. Beneficiaries living in small ethnic minority communities also need differentiated approaches given their difference in language, culture, and social norms, in the absence of which the inclusivity criteria of project beneficiaries may be difficult to achieve. Based on the scale of the Project, capacity of the Borrower, anticipated E&S risks and impacts and the context, the project risk has been assessed as 'Moderate'.

Since the subproject locations of the schools are not yet known, a framework approach has been adopted to prepare this ESMF. The objective of ESMF for the CSSRP is to ensure that environmental and social issues are appropriately considered and addressed during subproject planning and implementation. The ESMF provides general policies, guidelines and procedures to ensure that the project is implemented in an environmentally sustainable manner and in line with the applicable GOB and WB ES policies. Specifically, the ESMF aims to achieve the following: (i) minimize potential negative environmental and social impacts;

(ii) enhance positive environmental and social impacts; and (iii) develop capacity of DPE to manage environmental and social impacts in partnership with communities.

Although the environmental and social impacts are not significant, special attention needs to be provided for activities related to use of disinfectants. Improper selection, use, and disposal of such disinfectants might affect the physical environment and affect the health and safety of the workers and communities living near the school. Before implementation of the sub-projects, E&S condition will be screened to get an idea about the degree and extent of potential risks and impacts. The screening would involve reconnaissance of the sub-project area, identification of the major risks and preliminary assessment of the impacts of school disinfection activities on the socio-economic environment of the sub-project surrounding areas. Based on the extent of environmental and social risks, appropriate Environment and Social Code of Practice (ESCoPs) would be adopted and followed to manage the ES risks. If necessary, Environment and Social Management Plans would be prepared and implemented for risks, which are not covered by the ESCoPs. Additionally, other environmental and social instruments as required by the ESF, such as the Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP) and Small Ethnic Community Development Framework (SECDF) have been developed.

Project Implementation Unit (PIU) will ensure screening of each sub-project and effective monitoring of environmental and social standards. PIU E&S consultant will be responsible for ensuring effective implementation of the ESMF at the field level.

Chapter 1: Introduction and Project Description:

The COVID-19 pandemic is causing profound socio-economic disruptions to countries across the world. In addition to the health and economic difficulties brought about by the pandemic, the education systems have also been severely affected. UNESCO reports that schools in 188 countries have closed—affecting 89.5 percent of all learners or 1.5 billion students worldwide. While in some countries schools have reopened partially with safety measures, in Bangladesh Schools and education institutions have been closed for around a year - since March 2020 significantly impacting the entire student population of around 38 million students, including 3.79 million in preprimary and 17.3 million in primary, and increasing the learning gap.

The Global Partnership for Education's (GPE) COVID-19 accelerated funding window is providing funding allocations to address the pandemic's impact on basic education systems in 67 countries; with Bangladesh receiving US\$15 million. The Bangladesh COVID-19 School Sector Response (CSSR) Project will help Bangladesh tackle the learning challenges posed by this pandemic. The World Bank has been selected as the Grant Agent (GA) for processing and supervising the proposed grant through the consensus of the Government of Bangladesh (GOB) and the Local Education Group (LEG). The project will fund activities to mitigate and recover from COVID-19, enable teaching-learning to continue, and ensure the education sector is more resilient to future shocks.

The objective of the project is to

- i. strengthen the basic school system's institutional capacity to respond to, and recover from, the COVID-19 crisis; and
- ii. build resilience to face future crises from pre-primary to secondary levels.

The Project interventions will be implemented through three key components to achieve the Project Development Objectives (PDO):

Component 1: Engaging in Systemic Response (to strengthen remote learning system and reach all children including vulnerable population);

Component 2: Supporting Education System Recovery (to support safe school reopening, re-enrollment and learning recovery of students);

Component 3: Building System Resilience (to improve system resilience in the long run); and

Component 4: Project Management, Results Monitoring and Communication.

The Project will implement Response, Recovery and Resilience measures to address the impact of COVID-19 due to school closure. The project will be in the form of Technical Assistance (TA) that will be provided for developing remote learning resources/contents, communication campaigns, school re-opening plan, preparation and implementation of school sanitization plan after school re-opening, re-enrollment activities, teachers' professional development, development of standard operating procedures for emergencies

and periods of extended school closures. Monitoring and evaluation (M&E) capabilities of the Implementing Agency (IA) will also be developed through the TAs. Directorate of Primary Education (DPE) under the Ministry of Primary and Mass Education (MoPME) will implement the project in collaboration with Secondary and Higher Education Division (SHED) of Ministry of Education (MOE). The Project will be financed through Investment Project Financing (IPF) and will need to meet the requirements of the relevant Environmental and Social Standards (ESSs) of the World Bank (WB) ESF.

The components of the project are:

Component 1: Technical Assistance for Immediate Response Interventions:

The objective of the Response component focus on protecting, preventing, and mitigating while schools are closed as well as taking initiative to work towards recovery phase. Under this component the Project will develop remote learning resources/contents; dissemination plan and technical expertise which operationalize all four remote learning platforms (TV, Radio, Mobile and Internet); develop and implement communication campaigns and create a school re-opening plan.

Component 2: Technical Assistance for Medium Term Recovery Strategies:

The objective of the Recovery component is to focus on comprehensive recovery strategies for students, teachers, and schools once schools reopen while preparing to work towards building resilience. Under this component the Project will develop and implement a school sanitization plan prior to school reopening; ensure maximum re-enrollment at pre-primary and primary level; develop learning loss assessment and recovery lesson plan; create contents/manual/standards for teachers' professional development; and develop tools to ensure mental health issues post-shutdown.

Component 3: Building System Resilience for the Long Term:

The Resilience component focus on enabling the system to be better prepared to react and recover from future shocks. Under this component the Project will develop content and low cost learning package; ensure a sustainability plan for the remote learning platform; develop strategies and standard operating procedures (SOP) for education servicedelivery during emergencies and periods of extended school closures. The sub-component would also support creation of an emergency delivery unit with representation government, private sector, NGOs engaged in education delivery to face any kind of emergency or launch a national effort that requires extended coordination.

Component 4: Project Management, Results Monitoring and Communication:

The objective of this component is to support project management and build results monitoring and evaluation (M&E) capability, create grievance redress mechanism (GRM) and support project operating costs.

The proposed project uses the Investment Project Financing (IPF) instrument. In view of the emergency situation (Situation of Urgent Need of Assistance and/or Capacity Constraints), the proposed project is prepared under the condensed procedure covered by Paragraph 12 of Section III of the IPF Policy of the World Bank Group.

Chapter 2: Legal, Regulatory, and Policy Framework:

The country is committed to sustainable socio-economic development with natural resources management and environmental conservation. GoB has already incorporated environment and biodiversity conservation in its constitution in the 15th amendment (act no. 14 of 2011). GoB also revised National Environmental Policy, 1992 and Environmental Conservation Rules (ECR), 1997 and adopted Environmental Conservation Acts in 1995. The National Environment Policy has integrated other sector's policies and those policies integrated national environment policy as crosscutting issue. Social policy regarding Labor Laws/Act, laws regarding women's rights, laws addressing contagious diseases etc. also come in to application in this project. Furthermore, the WB's Environment and Social Framework (ESF) and Environment, Health and Safety Guidelines (EHSG) have their applicability in the project. A review of these policies and legal instruments are presented in this section.

2.1 Review of Relevant National Environmental and Social Policy, Legal and Regulatory Framework:

Communicable Diseases (Prevention, Control and Eradication) Act 2018:

The Act was passed in 2018 and it repealed and merged some of the dated laws and ordinances regarding infectious disease control, including the Epidemic Diseases Act (1897), the Public Health (Emergency Provisions) Ordinance (1944), the Bangladesh Malaria Eradication Board Ordinance (1977) and the Prevention of Malaria (Special Provisions) Ordinance (1978). The objective is to protect the people from the national and international spread of infectious diseases, to prevent, control and eradicate such diseases, to issue global alerts and to increase mutual support for the outbreak of the disease, to increase the capacity for precise risk management and to spread related education, to review the progress of diseases, to protect rights including Systematic loss.

National Environmental Policy 1992 amended 2018:

The NEP sets out the basic framework for environmental action together with a set of broad sectoral guidelines for action. Major elements of the policy covers maintaining of the ecological balance for ensuring sustainable development; protection of the country against natural disasters; identifying and controlling activities which are polluting and destroying the environment.

Bangladesh Environmental Conservation Act 1995 amended 2002:

This umbrella Act includes laws for conservation of the environment, improvement of environmental standards, and control and mitigation of environmental pollution. It is currently the main legislative framework document relating to environmental protection in Bangladesh. It is currently the main legislative framework document relating to environmental protection in Bangladesh, which repealed the earlier Environment Pollution Control ordinance of 1977. The Department of Environment (DoE) implements the Act. A Director General (DG) heads DoE. Under the Act, operators of industries/projects must inform the Director General of any pollution incident. In the event of an accidental pollution, the Director General may take control of an operation and the respective operator is bound

to help. The operator is responsible for the costs incurred and possible payments for compensation.

Environment Conservation Rules 1997 and its Amendment:

The Environment Conservation Rules (ECR), 1997 and its amendment in 2010 provide a first set of rules under the ECA, 1995. Among other things, these rules set (i) the National Environmental Quality Standards for ambient air, various types of water, industrial effluent, emission, noise, vehicular exhaust etc., (ii) requirement for and procedures to obtain Environmental Clearance, and (iii) requirements for IEE/EIA according to categories of industrial and other development interventions. Rule 7 of ECR has classified projects into Green, Orange A, Orange B and Red category basing on Environmental risk. Any proponent planning to set up or operate an industrial project is required to obtain an "Environmental Clearance Certificate" from the Department of Environment (DoE), under the Environment Conservation Act 1995 amended in 2002.

Medical Waste (Management and Treatment) Rules 2008:

The GoB promulgated the Medical Waste (Management and Treatment) Rule, 2008 for processing and management of MW in Bangladesh. It was prepared through active participation of MoHFW, MoL and MoEFCC mainly with the objective of proper management of medical waste and protecting the environment. The Medical Waste (Management and Treatment) Rules 2008 forms the base of management of all medical waste in the country. The rules are applicable only to waste management facility/operators i.e. those involved in transportation, treatment and disposal of medical waste. The law provides for guidance on the collections, storage treatment and disposal of medical waste for management facilities/operators. The institutions or agencies involved in collection, transport, storage, have to obtain authorization from the DoE.

National Health Policy 2011:

National Health Policy (NHP) 2011 views access to health as a part of recognized human rights. In order to achieve good health for all people, equity, gender parity, disabled and marginalized population access in health care need to be ascertained.

National Water Policy 1999:

The water policy of the government aims to provide direction to all agencies working with the water sector, and institutions that relate to the water sector in one form or another, for achievement of specified objectives.

The policies set forth are considered essential for addressing the objectives of improved water resources management and protection of the environment. Every public agency, every community, village and each individual have an important role to play in ensuring that the water and associated natural resources of Bangladesh are used judiciously so that the future generations can be assured of at least the same, if not better, availability and quality of those resources.

Bangladesh Water Act 2013:

Makes provisions for integrated development, management, abstraction, distribution, use, protection and conservation of water resources. Ensures water sources are free from any type of pollution.

National Disaster Management Act, 2012:

This Act provides for activities on disaster management coordinated, object oriented and strengthened; and to formulate rules that will build up infrastructures of effective disaster management in fighting all types of disaster.

National Women Development Policy 2011:

This policy was developed with the objective to establish equal rights of men and women in areas of state and public life, to ensure security and safety of women, to ensure the socio-economic, political, administrative and legal empowerment and to establish human rights of women.

Bangladesh Labor Act, 2006 and Amendment 2013 and 2018:

The Bangladesh Labor Act, 2006 and Amendment 2013 that illustrates the basic conditions of employment, which are materially consistent with ESS 2, guide terms and Conditions of employment. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating, hours of work, wages, leave entitlements, job description, grievance procedure, benefits if any etc. This Act also covers issues of Occupational Health and Safety (OHS) of workers and the provision of a comfortable work environment and reasonable working conditions, safety precaution regarding explosive or inflammable dust/ gas, protection of eyes, protection against fire, works with cranes and other lifting machinery, lifting of excessive weights, provision of safety measures like appliances of first aid, maintenance of safety record book, rooms for children, housing facilities, medical care, group insurance etc.

Tribal People's Right:

The Constitution of Bangladesh guarantees equal rights and equality before law of its citizens. Article 27 guarantees equality of citizens before the law and Article 28 prohibits discrimination on grounds of religion, sex, caste, race and place of birth. Besides the Constitution, there is also a corpus of legal, institutional and policy dispositions for the safeguards of the tribal peoples' rights in Bangladesh.

2.2 WB Environment and Social Framework and Standards (ESF/ESS):

Since October 01, 2018, all WB funded Investment Project Financing (IPF) are required to follow the Environmental and Social Framework (ESF) consisting ten (10) Environmental and Social Standards (ESS). These ESSs set out their requirement for the borrowers relating to the identification and assessment of ES risks and impacts associated with any project. Brief descriptions of the ten (10) ESSs including their relations with the project are appended below:

Table 1: ESF Requirement and Relevance with the Project

ESSs	Requirements	Extent of Relevance to the sub-projects/project
ESS-1 Assessment and	The types of ES risk and impacts that should be considered in the ES assessment, provision of various ES instruments and use	Relevant and provides basis for ES risk and impact assessment and mitigation

ESSs	Requirements	Extent of Relevance to the sub-projects/project
Management of ES Risks and Impacts	and strengthening of the Borrower's ES framework.	measures, Environmental and Social Commitment Plan
ESS-2 Labor and Working Conditions	Provisions on the treatment of Project workers, terms and conditions of work, non-discrimination and equal opportunity, provisions on child labor and forced labor management and occupational health and safety measures	Relevant and provides guidance for addressing labor related issues. The project will employ Direct and Contracted workers
ESS-3 Resource Efficiency and Pollution Prevention and Management	Requirements on management of wastes, chemical and hazardous materials and contains provisions to address historical pollution and overall use of resource efficiently.	Relevant and provides guidance addressing issues of pollution prevention and waste management
ESS-4 Community Health and Safety	Takes into account community safety, concept of universal access, traffic and road safety including road safety assessments and monitoring. Requirement of necessary protective measures against COVID-19 for the workers and others associated with the project.	Relevant and provides guidance on addressing community health and safety issues as well addressing the need for COVID-19 protocol application
ESS-7 Indigenous Peoples	Applies, since this is a national project and to ensure that SECs are not excluded from receiving project benefits engagement with them in a culturally cognizant way is essential for successful implementation of the project	Stakeholder engagement, coupled small ethnic minority people identified will provide inputs to determine impacts on small ethnic peoples
ESS-10 Stakeholder Engagement and Information Disclosure	Requires stakeholder engagement throughout the project life cycle, and preparation and implementation of a Stakeholder Engagement Plan (SEP). Requires early identification of stakeholders, both project-affected parties and other interested parties, and clarification on how effective engagement takes place.	The PIU has prepared a Stakeholder Engagement Plan (SEP) identifying various stakeholders and assessing their needs and impacts of the project including setting up of a GRM

2.3 WB Environmental, Health, and Safety Guidelines (EHSG)

The World Bank Group Environmental Health and Safety Guidelines (EHSG)¹ are technical reference documents that provide information on environmental, health and safety issues,

¹ World Bank Group Environmental, Health and Safety Guidelines

including acceptable pollution prevention and abatement measures and emission levels for WB projects. They contain both general guidelines and industry-specific guidelines in relation to Good International Industry Practice (GIIP).

The general guidelines include the following topics:

Environmental (Air Emissions and Ambient Air Quality; Energy Conservation; Wastewater and Ambient Water Quality; Water Conservation; Hazardous Materials Management; Waste Management; Noise; Contaminated Land)

Occupational Health and Safety (General Facility Design and Operation; Communication and Training; Physical Hazards; Chemical Hazards; Biological Hazards; Radiological Hazards; Personal Protective Equipment (PPE); Special Hazard Environments; Monitoring)

Community Health and Safety (Water Quality and Availability; Structural Safety of Project Infrastructure; Life and Fire Safety; Traffic Safety; Transport of Hazardous Materials; Disease Prevention; Emergency Preparedness and Response)

Construction and Decommissioning (Environment, Occupational Health & Safety; Community Health & Safety)

Environment, Health and Safety (EHS) issues should be incorporated into ES assessment and management process, which will include:

- Identification of EHS risks early in the project, including the site selection process, design and engineering aspects.
- The likelihood and magnitude of EHS risks should be based on nature of the project activities. There should be an objective of overall reduction of risk to human health and the environment, focusing on the potential impacts and elimination of cause of hazard at the source. Where impacts cannot be avoided, engineering and management controls should reduce or minimize magnitude of impacts.
- Procedures for accidents should be prepared, including preparation of workers and communities.
- EHS performance improvements, and ongoing monitoring performance and accountability.

2.4 COVID-19 Policy and Guidelines:

World Health Organization (WHO) Guidance

The WHO is maintaining a website specific to the COVID-19 pandemic with up-to-date country and technical guidance. As the situation remains fluid it is critical that those managing both the national response as well as specific HCF and programs keep abreast of guidance provided by the WHO and other international best practice. WHO resources include technical guidance on: (i) infection prevention and control, (ii) rights, roles and responsibilities of health workers, including key considerations for occupational safety and health, (iii) water, sanitation, hygiene and waste management, (iv) quarantine of individuals,

(v) rational use of PPE, (vi) improve and ensure good indoor ventilation; (vii) Gender based violence.

The Government's COVID-19 Response and Recovery Plan²

The GoB has prepared a COVID-19 Response and Recovery Plan for Education that was developed with the leadership of the MoPME and MoE and in consultation with the LEG. This plan focuses on the learning discontinuation and its associated challenges caused by the COVID-19 pandemic based on a rapid situation analysis. To address the unprecedented challenges in the basic education sector and ensure continued learning, the plan conceptualized a three-phase response focusing on immediate (response), medium-term (recovery), and long-term actions (recovery and system resilience). The required interventions envisioned in this plan aim to build on and complement the existing infrastructure and activities of two existing GoB programs in basic education—PEDP4 and the SEDP. Hence, this Plan provides a set of options and strategies that can be operationalized and implemented by school education authorities and departments in collaboration with other stakeholders based on different short to medium- and longer-term interventions that will be context-based.

School Reopening Guidelines following Covid-19 Health and Safety Protocol (MoPME)³

Ministry of Primary and Mass Education (MoPME) in coordination with MoE and MoHFW issued an instruction on 8th September, 2020 for all primary schools instructing guidelines and protocols to be followed before reopening primary school. Sufficient logistic supports also need to be assured before reopening schools. The guideline has been prepared upon following COVID-19 guidelines of WHO, UNESCO, UNDP, World Bank, [Centre for Disease Control and Prevention \(CDC\)](#) (US) and other relevant protocols.

2.5 Gap Analysis of World Bank Requirements and National Laws:

A gap analysis between WB's ESSs and GoB Regulations was conducted as part of the E&S capacity assessment of MoPME. The results of the gap analysis indicated that the ES risk assessment and management system for development projects in Bangladesh is open-ended but just like other country's EIA systems, does not cover all the World Bank ESF's ES Standards. The ECA/ECR does not even define the scope of the EIA study (or the IEE), leaving it to the EIA to be prepared to determine the scope through initial assessment/screening. The coverage of the EIA study therefore would depend on the expertise of the EIA team or the DOE reviewers. There is no assurance that each ES Standards are considered in the EIA study and the formulation of the ESMP. Although the EIA is heavy towards the environmental aspects, more and more social issues are incorporated in the assessment. Moreover, the practice under normal circumstances does not include labor management issues. Another critical gap pertains to lack of provisions for requiring the preparation of project-specific ES management plans. However, the activities proposed under this project are of moderate risk in nature and will not require a full EIA. Preparation of ECoPs would be sufficient for these moderate risk activities. More information have been provided in the

² <https://drive.google.com/file/d/12Fp6FzPChqdo0IC-5b6CUllbLSuvXNJK/view>

³

https://mopme.gov.bd/sites/default/files/files/mopme.portal.gov.bd/notices/66d3e092_8ed3_4cc9_83be_a0a1f28bc3c9/08092020170410_01.pdf?fbclid=IwAR2U8AV4wMukf71-agUEJWWDmqP2cxLZSqeVHTZdiGrgJJRzN3X-dXtxDyY

section below. The eminent domain land acquisition system for example does not require the preparation of RAP, although ESS5 (Involuntary Resettlement) is not relevant to this project. The labor law does not mandate the projects to formulate their own Labor Management Procedures/Plans. Given the gaps, this ESMF will follow the most stringent standards and requirement. Table 2 below has given an overview of the gaps between GoB laws and WB's ESSs and steps suggested to address those gaps.

Table 2: Gaps between GoB Laws and World Bank ESSs

WB ESS	Gaps with GoB laws	Gap minimization
ESS-1 Assessment and Management of ES Risks and Impacts	(i) ESIA study screening and scoping do not guarantee coverage of all ESS in the assessment. (ii) The stakeholder engagement during the conduct of the ESIA is limited and the ESIA report is not disclosed.	ESMF has suggested following the ESS1 requirements, given in the relevant sections of Environmental Management Procedures. In case, DoE rules/regulations do not cover the ES standard requirements, and Project will follow the more stringent standards requirements according to ESSs.
ESS-2 Labor and Working Conditions	(i) The Labor Act does not specifically require that development be assessed and reviewed in terms of labor and working conditions including OHS requirements before approval. (ii) The Labor Act does not require development projects to prepare Labor Management Plans/Procedure or OHS Plans.	A standalone LMP has been prepared for the project which will guide labor requirements including OHS. Guideline for adopting Site Specific Management procedures including OHS measures have been included in the ESCoPs.
ESS-3 Resource Efficiency and Pollution Prevention and Management	The ECA/ECR indicates pollution prevention particularly Air and Water pollution. Besides Bangladesh Medical Waste Management and Processing Rules 2008 covers medical waste management.	ESCoPs will address this issue, and incorporate mitigation measures for efficient use of water and other natural resources, pollution prevention and waste management.
ESS-4 Community Health and Safety	Covered under ESIA but the systems do not provide clear requirements for the development project and implementation.	Guideline for Community Health Safety will be provided in the ESCoPs.

WB ESS	Gaps with GoB laws	Gap minimization
ESS-7 Indigenous Peoples	No equivalent requirements on: (i) coverage of ethnic community impacts in the ESIA; (ii) special treatment or differentiated approach to ethnic community and vulnerable groups; (iii) Obtaining FPIC; (iv) development of ethnic community Plan.	Highly relevant for this CSSR Project as the activities covered include areas where ethnic community peoples reside. A standalone SECDF has been prepared for the project.
ESS-10 Stakeholder Engagement and Information Disclosure	The ECA/ECR does not specifically require consultation but the ESIA guidelines issued by DoE and other agencies recommend public consultations during scoping and the preparation of the ESIA. There is also no provision for any stakeholder engagements during project implementation	A standalone SEP has been prepared for CSSR Project. ESS10 guideline for stakeholder's engagement will be followed by the CSSR Project.

Chapter 3: Potential Environmental and Social Impacts:

The Project will implement Response, Recovery and Resilience measures to address the impact of COVID-19 due to school closure. The Project will be in the form of Technical Assistance (TA) that will be provided for developing remote learning resources/contents, communication campaigns, school re-opening plan, preparation and implementation of school sanitization plan before school re-opening, re-enrollment activities, teachers' professional development, development of standard operating procedures for emergencies and periods of extended school closures. Monitoring and evaluation (M&E) capabilities of the Implementing Agency (IA) will also be developed through the TAs.

There will be no civil works and hence no construction related environmental impacts are expected. The interventions also are not likely to affect any biodiversity, natural/critical habitat, ecosystem or living natural resources negatively. However, school premises and classrooms of selected Government Primary Schools (around 20,000 within project life) will be disinfected; sanitization/hand washing facilities will be installed including health screening provisions. The major source of environmental concern will emanate from the use of disinfectants. Improper selection, use, and disposal of such disinfectants might affect the physical environment; affect health and safety of the workers and communities living near the schools. A specialized agency or service provider with required technical expertise would be engaged for school sanitization along with implementation of health safety protocols issued by the MoHFW. The anticipated social risks will mostly be associated with exclusion of certain school going student who are from poor, vulnerable and marginalized groups in the society will be out of reach and disengaged with learning activities, which will create gap in accessibility to learning opportunities. Beneficiaries living in small ethnic minority communities will also need differentiated approaches given their difference in language, culture and social norms, in the absence of which the inclusivity criteria of project beneficiaries may be difficult to achieve.

The scope of this project will be nationwide, covering all 08 (Eight) Divisions of the country. The direct beneficiaries of this project will be the students of pre-primary (around 3.7 million), primary (around 18 million) and junior secondary students (13 million) of Bangladesh. School teachers and parents will also benefit from this operation. Central and local level administration related to school service delivery system will also benefit through system level capacity building activities. There will also be indirect beneficiaries of the project, including the previous out-of-school children, illiterate adults, and content developers. While the project covers the entire country, particular focus will be given to vulnerable segments of the population, including girls and students from socio-economically disadvantaged and those from remote areas of the country.

Considering the nature and scale of the project, capacity of the borrower, anticipated environmental and social risks and impacts, and the context under which this intervention will be implemented, both the environmental and social risks have been assessed as Moderate.

The major source of environmental concern will emanate from the use of disinfectant. Improper selection, use and disposal of such disinfectants might impact the physical environment, affect health and safety of the workers and communities living near the schools.

Potential Environmental Risk:

The major environmental risks are:

- Waste management and community health and safety issues related to the storage, handling, transportation, and disposal of disinfectant.
- Poor infection control due to lack of proper Personal Protective Equipment (PPE) can contribute to increased risk of infection (can be fatal in case of Covid-19).
- Inadequate occupational health and safety practices due to lack of awareness and understanding.
- Risks related to the spread of COVID-19 among project workers and the communities due to project activities.
- Health risk of students' and teachers' due to unhygienic sanitation facilities, lack of supply of clean water which may cause potent risk of viral infections.

Potential Social Risk:

The project has been planned to be implemented countrywide. Therefore, there are some intrinsic social risk associated with the project:

Risk of Exclusion. The disadvantaged, the vulnerable and people living in a marginalized state are likely to be excluded from discussion and engagement and are likely to be kept away from putting their inputs in project design. Further their views may not be given due cognizance, especially of those of the ethnic minorities

Community Health and Safety. The communities may suffer from health and safety risk due to traffic, pollution due to use of chemicals, waste generation from disposal of PPE, exposure to COVID related issues

OHS. Workers' Occupational Health and Safety (OHS) risk due to working with chemicals and under pandemic situation

Chapter 4: Environmental and Social Management Procedure:

Since the subproject locations of the schools are not yet known, a framework approach has been adopted and this ESMF has been prepared. This ESMF has been prepared in accordance with national legal, regulatory, and administrative framework, and also following World Bank's Environmental and Social Framework and its relevant standards. The ESMF has been prepared to establish a mechanism to determine and assess potential environmental and social impacts of the project. This chapter discusses the steps involved in the environmental and social assessment process and procedure leading towards the review and approval of subprojects under CSSRP. The chapter gives an explicit description of roles, reporting and advice mechanisms during implementation of the project.

The project will use a structured approach to environmental and social management to allow the project development process following the project relevant ESSs of the WB ESF and related GoB rules and regulations and follow the mitigation hierarchy of avoidance, minimization, mitigation and compensation/offset for negative impacts and enhancement of positive impacts where practically feasible. Following sections describe what need to be done at each stage of the overall project life –implementation of the project activities and reporting on progress.

4.1 Environmental and Social Screening:

After selection of a subproject, environmental and social screening will be integral part of the sub-project planning and implementation. The screening will help in determining whether a proposed subproject should be subject to follow the Environmental and Social Code of Practices (ESCoPs) (Annex-3) to mitigate or avoid the impacts or need further review and preparation of separate environmental and social management plan. School Management Committee (SMC)/Upazilla Primary Education Officer with the assistance of representative of disinfecting firm will carry out the environmental and social screening process. In general, the environmental and social screening process identifies what impacts will be generated and what type of mitigation measures will be required for sub-projects. The participation and consultations with local communities are important to identify the potential impacts of the project interventions. A screening format is attached in Annex -1. The form in national language - Bangla will be used for the screening purposes at field level.

ESCoPs

The subproject will be screened to get an idea about the degree and extent of potential environmental and social risks and impacts. The screening would involve reconnaissance of the sub-project area, identification of the major risks and preliminary assessment of the impacts of school disinfection activities on the socio-economic environment of the sub-project surrounding areas and determining need for further scope and type of assessment. The screening needs to be done keeping in mind the following ESSs:

ESS2: Labor and Working Conditions:

The project shall be carried out in accordance with the applicable requirements of ESS 2, in a manner acceptable to the World Bank, including through, inter alia, implementing adequate occupational health and safety measures (including emergency situation preparedness and response measures), setting out grievance arrangements for project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and service provider and supervising firms.

The project is expected to encompass the following categories of workers: direct workers and contracted workers. Direct workers could be either government civil servants or those deployed as 'technical consultants' by the project. While contracted workers could be individual consultants and consulting and technical firms for contents/manual/standards development and preparation of various plans related to remote learning system, communication campaign, school reopening, learning loss assessment and mitigation measures for recovery, teachers' professional development and tools to ensure mental health issues during post-shutdown and for disinfecting school premises for reopening. Contracted workers will also include the assigned Disinfectant Firm's employees engaged in the project.

A Labor Management Procedure (LMP) has been prepared to address the applicability of labor laws and non-discrimination and equal opportunity, grievance mechanism to all workers and OHS protocols to be followed.

ESS3: Resource Efficiency and Pollution Prevention and Management

Wastes management and Disposal:

Storage, transportation, application and disposal of disinfectants have the potential to pollute surface water, soil and ground water if not properly handled. The mask and other PPE used by the worker can pollute the natural environment if not properly disposed. Solid waste including chemical waste (water, disinfected materials, toilets etc.) from the hand washing, disinfection and sanitation/toilet cleaning can have impact on the environment and human health. Wastes that generated from hand washing and cleaning activity could include liquid contaminated waste, chemicals, and other hazardous materials. Use, storage, handling and disposal of generated waste will be based on the screening (Annex-1) and subsequent compliance of EScops (Annex-3). Use of resources (water, energy and raw material) will also need to be monitored so that excess usage and loss may be prevented.

ESS4: Community Health and Safety:

The project would support preparing and implementing a safe school reopening plan (SSRP). There might be community health risk emanating from unsafe disposal of PPEs and from transportation, storage, use and disposal disinfectants.

EScops/Site specific ESMP will address issues related to use/transportation/disposal of disinfectant and disposal of PPE used by the workers to protect community health and safety aspect.

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

The Project will positively affect school going children of small ethnic minority communities in view of their unique characteristics including language, culture, occupation, and traditions. Social risk associated with the CSSR project is ensuring culturally appropriate benefits to the ethnic communities from project's various initiatives and interventions following the Bank's directive. Reaching out to small ethnic minority community people in the project areas with learning packages require involvement of community members/leaders (e.g. headman, karbari), CBOs/NGOs working with or in the Education sector.

A Small Ethnic Community Development Framework (SECDF) has been prepared to guide screening process to identify the presence of ethnic communities meeting the criteria of ESS7, to avoid any adverse impacts on them due to project activities and to ensure SEC participation and sharing fully the benefits of this CSSR project with them.

ESS10: Stakeholder Engagement and Information Disclosure

The project interventions need to be screened to determine the presence of vulnerable groups, minorities, Person with Disability (PWD) etc and any disproportionate risks and impacts they may suffer due to project interventions. This will result in differentiated approach to be taken to ensure their participation and benefits from the project.

A standalone SEP has been developed upon conducting meaningful consultations with aforementioned stakeholders that been disclosed with appropriate information with huge significance for ensuring safety from all perspectives – social, environmental, economic, and health. The SEP will serve the following purposes: (i) stakeholder identification and analysis; (ii) planning engagement modalities viz., effective communication tool for consultations and disclosure; and (iii) enabling platforms for influencing decisions; (iv) defining roles and responsibilities of different actors in implementing the Plan; and (v) a grievance redress mechanism (GRM).

4.2 Environmental and Social Codes of Practices (ESCoPs):

The environmental and Social codes of practice (ESCoPs) have been developed to guide the planning and implementation of sub-project activities in terms of avoidance or mitigation of the negative environmental and social impacts that may result from the projects. The codes define methods and procedures to be followed by the SMC/ Upazilla Primary Education Officer, Disinfecting Firm and other agencies involved with the project. Details of the ESCoPs are attached in Annex-3.

Once impacts are identified, the necessary mitigation measure will then be recommended. The SMC/ Upazilla Primary Education Officer with the assistance of field representative of the disinfecting firm will carry out the environmental and social screening and suggest use of appropriate ESCoPs as mitigation measures. If required, a simple ESMP for the subproject would be prepared. A sample ESMP format is attached in Annex -1.

Fig-1 shows the procedures to be followed in the CSSRP for ESMF implementation:

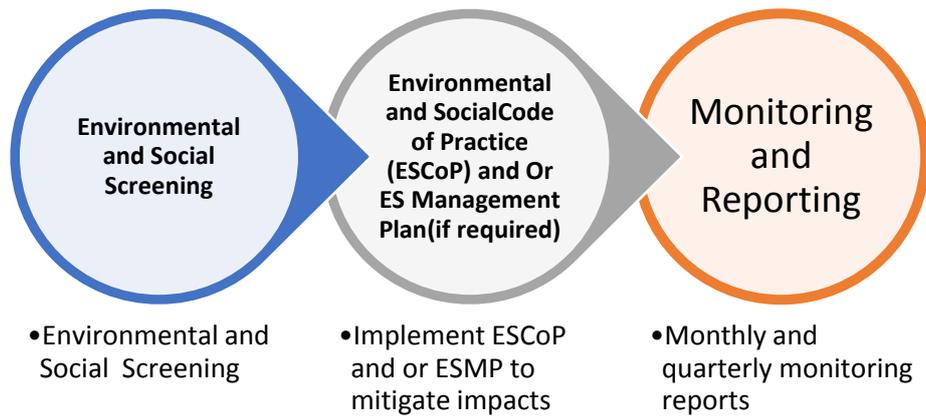


Figure 1: ESMF implementation process flow activities

Chapter 5: Institutional Arrangements and Capacity Building

5.1 Implementation Arrangements:

The overall responsibility of the PIU will lie with the DPE, as the lead implementing agency while the Directorate of Secondary and Higher Education (DSHE) will implement activities with close cooperation with the DPE.

The CSSRP PIU will be responsible for planning, coordination, implementation, monitoring of project activities; procurement and FM; capacity building at various levels, awareness campaign and communication; and reporting on project progress. Besides this PIU will have to ensure that project implementation is compliant with the World Bank’s ESF, GoB laws and regulations, Good International Industry Practice (GIIP); EHS&G; WHO COVID-19 Guidelines and the ESMF.

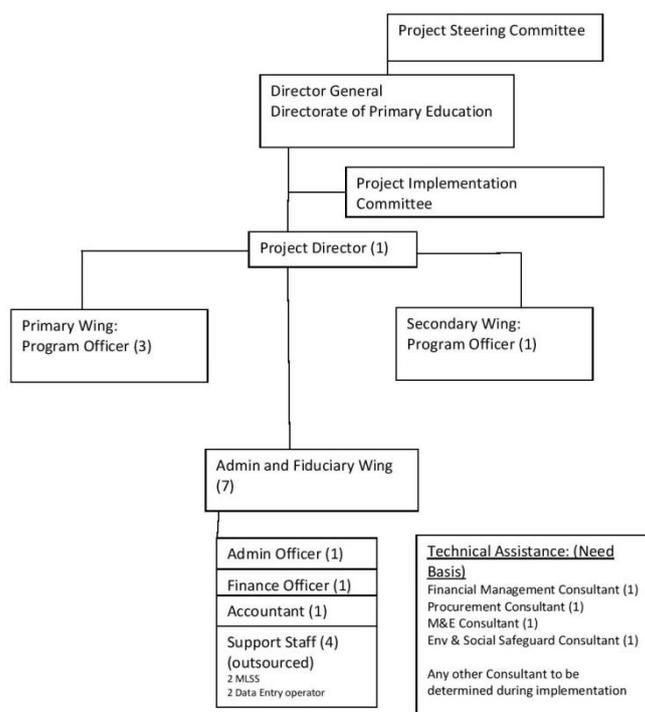


Figure 2: Organizational Structure of PIU

5.2 Roles and Responsibilities:

For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to manage and implement the ESMF and other relevant document. At school level, SMC/ Upazilla Primary Education Officer would be responsible for overall implementation of the ESMF/ESCoPs/ESMP with assistance from the firm engaged for disinfection activities and other related stakeholders.

Table 3: Roles and Responsibilities of ESMF Implementation

Organization	Responsibility
Project Implementation Unit (PIU)	<p>Project Implementation Unit, the CSSR PIU will be put in place, which will be responsible for</p> <ol style="list-style-type: none"> planning, coordination, implementation, and monitoring of project activities. procurement and FM. capacity building at various levels. awareness campaign and communication; and reporting on project progress. Overseeing the Environmental and Social Code of Practices (ESCoPs), screening sub-project schools and ESMP and reporting on E&S issues during implementation
E&S Consultant	<ul style="list-style-type: none"> Assist PIU in execution of the E&S aspects of the project; Responsible for preparing environmental and social documents; Provide trainings to PIU, relevant staffs and Disinfecting Firms, SMC's/ Upazilla Primary Education Officer on implementing ESCoPs and/ or ESMF; Administer screening of subprojects for E&S issues, review and clearance of subprojects to monitoring the implementation of the ESMP Closely coordinate with other agencies, Disinfecting firm, subproject staffs, community people and SMC/ Upazilla Primary Education Officer to support implementation of ESCoP, ES screening and ESMP; Assist PIU monitoring of the implementation of all ESCoPs, sub-project screening and ESMP; Ensure that all the project activities are carried out in environmentally sound and socially acceptable manner; Prepare and disseminate guidelines to deal with emergency situation for sub-projects, Providing training on ESCoPs, screening, and requirements to subproject staffs, SMC/ Upazilla Primary Education Officer and Disinfecting Firms.
SMC/ Upazilla Primary Education Officer	<ul style="list-style-type: none"> Coordinate with relevant staffs and disinfecting firms implementing ESMF including screening of sub-projects, adopt appropriate ESCoPs and or prepare ESMP and monitor implementation of the ESCoPs and/or ESMP; Support PIU monitoring and tracking implementation of the sub-project activities; Support project implementation unit with relevant data

Organization	Responsibility
	for preparation of monitoring reports; <ul style="list-style-type: none"> • Receive and disseminate project related knowledge at the field level project;

5.3 Capacity Building:

Environmental and social standard trainings will help to ensure that the requirements of the ESSs are clearly understood and followed by all project personnel throughout the project period. The PIU will ensure, in collaboration with the PIC and PSC that these trainings are provided to all PIU Officials, administrative and operational personnel, Communication personnel and Disinfectant personnel and Contractors. The training commitment and requirement of ESCP will also needs to be adhered to.

Table 4: Training Programs for Capacity Building

Capacity Support (Training)	Timeframe	Responsible
Training topics will among others include (for PIU Officials, administrative and operational personnel, Communication personnel and Disinfectant personnel and Contractors) <ul style="list-style-type: none"> • Environmental and Social Framework (ESF) with special emphasis on Labor, Gender-Based Violence (GBV) and Community Health and Safety Issues (for all) • ToT for implementation of ESMF for the concerned District and Upazila education officer under DPE, HSED and representative of disinfection firm. • Screening methodology, ES assessment, ESMP preparation 	Within 45 days of the project implementation Within one month following the finalization of the ESMF	PIU (ES Consultant)

5.4 Monitoring:

The main purpose of monitoring is to ensure proper implementation of various sub-project activities in terms of avoidance or mitigation of the negative environmental and social impacts that may result from the projects implementation. The PIU in association with SMC/ Upazilla Primary Education Officer will be responsible for the monitoring of the implementation of screening sub-project adoption of ES Code of Practices (ESCoPs) and/or preparation of ESMP where required and subsequent implementation

5.5 Reporting:

The ES Specialist of the PIU with the support of SMCs/ Upazilla Primary Education Officers will prepare and submit to WB Quarterly environmental and social progress reports to track implementation status and progress of planned activities, or as stipulated in the ESCP

Chapter 6: Public Consultation and Disclosure Plan

6.1 Stakeholder Engagement and Information Disclosure:

A Stakeholder Engagement Plan (SEP) has been prepared for the project detailing stakeholder identification, method and subject of communication and grievance redress mechanism. The SEP is referred here for detail requirements on stakeholder engagement and GRM.

6.2 Stakeholder Analysis:

Given the emergency nature of this operation and the transmission dynamics of COVID-19, consultations have been limited to telephone interviews, e-mails, etc. In particular, the Project team had discussions with a number of key government agencies including MoPME, Secondary and Higher Education Division (SHED) of MoE, DPE, Asian Development Bank (ADB), Japan International Cooperation Agency (JICA), UNESCO, UNICEF, Canadian International Development Agency (CIDA), Campaign for Popular Education (CAMPE) etc. about project design and related issues. The project also had discussions with the Local Education Group (LEG) comprising of government officials associate with District and Upazila Levels central/local education system, NGOs, CSOs and Development Partners engage in education system.

6.3 Summary of Stakeholder Consultation:

The outcome of the consultations is summarized below:

Discussion Topic	Response
The Project may integrate existing e-learning programs/initiatives during implementation.	The project shall build upon the existing and also develop new materials, while learning and scaling up good practices
Capacity building of local administrators and local service delivery who are able to provide feedback on what works	Sub-component 1.3 puts emphasis on the preparedness of the local level officials, teachers, and headmasters. Under component 2.1 (ii) the document talks about increasing the capacity of local level authorities and school authorities
The project proposal maintains the emphasis of the GPE on most marginalized and girls	Yes, this is a priority focus, this will have to be at the center of project implementation.
If indigenous learners are included, there could an additional immediate outcome in the “theory of change” and indicator in “result framework” and “M& E plan”; “number of indigenous children provided with learning packages/ materials”	This is covered by the Intermediate Indicator which tracks number of hard-to-reach children
Reviewing and updating primary curriculum	To meet the immediate needs of the lost

Discussion Topic	Response
and high –stake primary examination (PECE) is time consuming and purely a technical task. Will the scope of the TA (proposed to be provided) cover this?	academic year, there needs to be an examination of the transition options available. NCTB with TA support is expected to carry this out.

During consultations identified issues related to community, environment and social aspects are acknowledged in preparation of the E&S Screening and ESCoPs.

6.4 Grievance Redress Mechanism:

Grievance Mechanism (GM) is a valuable tool which allows affected people to voice concerns regarding environmental and social impacts for project activities. The CSSR Project will establish a grievance mechanism (GM) for addressing grievances and complaints received from the project affected persons due to environmental and social issues. The CSSR Project's PIU would ensure that grievance redress procedures are in place and monitor those procedures to ensure that grievances are handled properly. The PIU will establish a procedure to answer project related queries and address complaints, disputes, and grievances about any aspect of the project, including disagreements regarding the assessment and mitigation of environmental and social impacts. Details of the institutional arrangements and procedures for GRM are presented in detail in the SEP.

6.5 Disclosure of ESMF:

Electronic copy of the ESMF will be disclosed in the official Website of DPE simultaneously with the SEP and LMP where it would be accessible by all relevant stakeholders. Free printed copies of the ESMF in Bangla and English will be made accessible to the general public at the DPE HQ, office of the District and Primary Education Officers, Upazila HQ and at concerned schools.

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WHO Rational use of personal protective equipment for coronavirus disease ((COVID-19)and considerations during severe shortages: interim guidance, 2020. <https://apps.who.int/iris/handle/10665/331695> Accessed on 20 March, 2021

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Ventilation in Schools and Childcare Programs: How to use CDC building recommendations in your setting, <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/ventilation.html> Accessed on March 20,2021

ANNEX-1: ENVIRONMENTAL AND SOCIAL SCREENING FORMAT

1. Name of the School:
2. Location (Village, Ward, District, Union):
3. Number of Students:
4. Male: Female:
5. Contact person:
6. General Description of the sub project:
 - i. Sub project objectives:

ii. Subproject activities

7. Identification of Environmental and Social Impacts

Sl No	Aspects	Yes	No	Scale of Impact			Remarks (Select appropriate ESCoPs, if available/ justified)
				High	Medium	Low	
1.	Whether the disinfectant to be used will be stored within the school premises?	<input type="checkbox"/>					
2.	Is there any possibility of contamination of nearby surface waterbody due to disposal of PPE or washing of disinfecting equipment?	<input type="checkbox"/>					
3.	Whether solid waste would be generated during the disinfection process?	<input type="checkbox"/>					
4.	Is there any possibility of drainage congestion due to implementation of the sub-project?	<input type="checkbox"/>					
5.	Is there safe storage facility for disinfecting chemicals?						
6.	Is there adequate ventilation in the storage area?						
7.	Is there any possibility of affecting nearby community people due to disposal of PPE or washing of disinfecting equipment?	<input type="checkbox"/>					
8.	Whether any labor shed would be constructed within the school premises?	<input type="checkbox"/>					

SI	Aspects	Yes	No	Scale of Impact			Remarks
9.	Is there any occupational health and safety risk due to implementation of the disinfecting process?	<input type="checkbox"/>					
10.	Is there any possibility of loss/contamination of top soil?	<input type="checkbox"/>					
11.	Any possibility of water logging in the sub-project areas?	<input type="checkbox"/>					
12.	Any negative effects on surface water quality, quantities or flow?	<input type="checkbox"/>					
13.	Is there any possibility of spread of vector born diseases?	<input type="checkbox"/>					
14.	Is there any possibility of increased noise due to implementation of the disinfection activities?	<input type="checkbox"/>					
15.	Is there any possibility of air pollution due to sub-project activities?	<input type="checkbox"/>					
16.	Is there any possibility of impact on livelihood of poor, vulnerable people due to implementation of the disinfecting process?	<input type="checkbox"/>					
17.	Is there any possibility of impact on ethnic community people due to implementation of the disinfecting process?	<input type="checkbox"/>					
18.	Is there any possibility of disturbance on local community due to the implementation of the disinfecting process?	<input type="checkbox"/>					
19.	Is there any possibility of negative impact on women, female teachers or girls due to the implementation of disinfection process?	<input type="checkbox"/>					

9. Other possible Environmental and Social impacts

Environmental and Social impacts	Mitigation measures (Identify the relevant ESCoPs)	Sub-project Categorization (Low/Medium/High)

10. The Environmental and Social Management Plan (ESMP) to be followed during implementation of the subproject. (If impacts beyond the **ESCoP**)

11. Recommendations:

Chairperson SMC / Upazilla Primary Education Officer	Name:	Signature:	Date:
Field Supervisor of Disinfectant Firm	Name:	Signature:	Date:
Community members (add columns if required)	Name:	Signature:	Date:
Indigenous Community/ Groups (If required)	Name:	Signature:	Date:

ANNEX-2: TYPICAL ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Activity/Issue	Potential Environmental Impacts	Proposed Mitigation Measures	Responsible Parties	Timeline	Estimated Cost

ANNEX-3: ENVIRONMENTAL AND SOCIAL CODE OF PRACTICE (ESCOPS)

ESCoP-1: Waste Management

ESCoP-2: Selection, Storage, Transportation of Disinfectants

ESCoP-3: Water Resource Management

ESCoP-4: Water and Sanitation Facility

ESCoP-5: Noise and Vibration

ESCoP-6: Air Quality Management

ESCoP-7: Occupational Health and Safety

ESCoP-8: Potential Risk of transmitting COVID-19

ESCoP-1: Waste Management

Project activity/ impact source	Environmental and Social Impacts	Mitigation Measures/ Management Guidelines
Waste generated from disinfection activity	Soil contamination, water pollution and drainage congestion Waste storage, and burn/burial with in sub- project premises may damage the top soil	<ul style="list-style-type: none"> • Provide dedicated covered waste collection bins to ensure safe storage; • Remove collected wastes for dispose in approved waste disposal sites; • Maintain health and hygiene practice while handling wastes; • Use appropriate PPEs before handling wastes (gloves, mask, apron, safety boots); • Maintain PPE's properly by cleaning dirty ones and replacing them with the damaged ones; • Maintain good housekeeping practices; • Monitor all collections bins are in proper position (with lead); • Proper handling and disposal of disinfectant chemicals in accordance with the ESCoPs-2; • Training on safe handling, collecting, storing and safe disposal; • Store waste into a confined area before disposal; • Store strip the top soil before burial of wastes;

ESCoPs-2: Selection, Storage, Transportation and Disposal of Disinfectants

Project activity/ impact source	Environmental & Social Impacts	Mitigation Measures/ Management Guidelines
Selection of disinfecting chemicals	<ul style="list-style-type: none"> • Unauthorized chemicals may hazardous to the physical environment • Affect human health 	<ul style="list-style-type: none"> • Procure safe chemicals as recommended by WHO/ Government; • Approve only authorized safe disinfecting chemicals; • Train sub-project SMC/ Upazilla Primary Education Officer and relevant staffs on purchase safe chemicals;
Storage	<ul style="list-style-type: none"> • Unsafe chemical storage or store in an open area may affect the physical environment and harmful for human health 	<ul style="list-style-type: none"> • Store required amounts in order to reduce waste; • Safe storage (in dry, cool temperature) with sufficient air circulation at chemical store; • Ensure proper ventilation/ air circulation in the store; • Use proper PPE (gloves, mask, goggles, safety shoe) before handling chemical; • Ensure Material Safety Data Sheet (MSDS) for all chemicals; • Provide absorbent materials to control accidental release of chemicals; • If the storage is done within the school premises, select the store room is a way that a safe distance from the class rooms can be maintained. Take special care so that no student and teacher can access the storage area. • Restrict unauthorized entry in the store at all time and put in place adequate danger sign; • Provide training to related staffs on the safe chemical storage.
Transport and disposal	<ul style="list-style-type: none"> • Unsafe disposal may pollutes surface and ground water • Uncontrolled disposal cause soil contamination 	<ul style="list-style-type: none"> • Dispose chemicals as per given instruction (on the MSDS); • Dilute chemicals and dispose into the treatment plant if available otherwise dispose into the soak-well, do not dispose chemical into surface water (ESCoPs-1); • Provide training to related staffs on the safe transportation and disposal of chemicals.

ESCoPs-3: Water Resource Management

Project activity/ impact source	Environmental and Social Impacts	Mitigation Measures/ Management Guidelines
Waste from disinfectant material	Water pollution from disinfection material, disinfecting wastes and accidental release of chemicals	<ul style="list-style-type: none"> Follow the management guideline proposed in ESCoPs 1 and ESCoPs-3; Minimize of sediments, oil and grease, litter, debris and any other form of wastes;
Discharge/ spillage of chemicals from sub-projects	Surface water may deteriorate due to disinfecting activity	<ul style="list-style-type: none"> Collect generated wastewater into the confined chambers/ temporary sedimentation tanks; Ensure proper waste management (ESCoPs-1) guidelines;

ESCoPs-4: Water and Sanitation Facility for labors

Project activity/ impact source	Environmental and Social Impacts	Mitigation Measures/ Management Guidelines
Lack of WASH facility for labors can cause inconvenience to the user and affect their personal hygiene	<ul style="list-style-type: none"> Spreading of sewage water cause negative impacts on ground and surface water. Spreading of sewage water may create vector born diseases 	<ul style="list-style-type: none"> Arrange proper hygienic toilet facility; Manage toilet wastes properly; Ensure clean water and soap for toilets; Adequate lighting and ventilation for toilets; Separate toilet for male and female.

ESCoPs-5: Noise and Vibration

Project activity/ impact source	Environmental & Social Impacts	Mitigation Measures/ Management Guidelines
Use of machineries for disinfecting activities	Any unwanted sound from the disinfecting equipment may cause noise pollution.	<ul style="list-style-type: none"> Maintain all equipment in order to keep it in good working order in accordance with manufactures maintenance procedures; Equipment suppliers and contractors shall present proof of maintenance register of their equipment;

		<ul style="list-style-type: none"> • Employ best available work practices on-site to minimize occupational noise levels; • Aware disinfecting firms, SMC/ Upazilla Primary Education Officer, and others on potential noise problems and techniques to minimize noise pollution; • Ensure no work after sunset etc.
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ESCoPs-6: Air Quality Management

Project activity/ impact source	Environmental & Social Impacts	Mitigation Measures/ Management Guidelines
Disinfecting activities can generate air pollution	Air quality can be adversely affected by emissions from disinfecting chemicals, machinery and fuel combustion	<ul style="list-style-type: none"> • Volatile gas may generate from accidental release of disinfecting chemicals, store chemicals in a safe and confined area following chemical store guidelines (ESCoPs-3); • Air pollution may cause due to the burning of wastes. For proper waste management follow the ESCoPs-1; • Machinery causing excess pollution (e.g. visible smoke) will be banned from sub-project sites • Fit machinery with appropriate exhaust systems and emission control devices. Maintain these devices in good working condition in accordance with the specifications defined by their manufacturers to maximize combustion efficiency and minimize the contaminant emissions. • Ensure periodic vehicle inspection

ESCoPs-7: Occupational Health and Safety

Project activity/ impact source	Environmental & Social Impacts	Mitigation Measures/ Management Guidelines
Conducting disinfecting activities by the	Lack of Occupational Health and Safety practice cause health	<ul style="list-style-type: none"> • Provide personal protection equipment (PPE), such as safety boots, masks, gloves, protective clothing, goggles etc.

labors	hazard	<ul style="list-style-type: none"> • Provide adequate number of hand washing booths/facility; • Provide trainings to the cleaners, disinfecting firms staffs, SMC/ Upazilla Primary Education Officer, teachers on right use, store and disposal of PPE; • Maintain the PPE properly by cleaning dirty ones and replacing them with the damaged ones; • Ensure first aid facility for the labors; • Aware all labors about steps to be followed in case of emergency situations; • Implement suitable safety standards for all sub-project workers associated with disinfecting firms or cleaners which shall not be less than those laid down on the international standards (WHO and CDC guidelines); • Record keeping on accidents and incidents; • Follow the GRM procedure of the project in case of any complain arise from worker, staffs, cleaners or others related to the sub-project; • Follow Labor Management Procedure (LMP) to handle labor related issues; • Provide training to related staffs and workers on OHS; • In Bidding document, ensure OHS standards and protocols, monitoring and reports
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ESCoPs-8: Potential Risk of transmitting COVID-19

Project activity/ impact source	Environmental & Social Impacts	Mitigation Measures/ Management Guidelines
Setting up labor shed for accommodation of labor, conducting disinfecting activities, possible interaction of	Lack of awareness and knowledge in health care among labors pose risk of transmitting of COVID-19	<ul style="list-style-type: none"> • Schedule for disinfection in such a way to avoid interaction of the labor and local people; • Conduct disinfection activities as per plan to minimize risks; • Provide personal protection equipment (PPE), such as safety boots, masks, gloves, protective clothing, goggles etc.; • Enforce health and hygiene protocols: hand washing, wearing mask for all labors;

labor force with the local community.		<ul style="list-style-type: none"> • Provide adequate ventilation facilities; • Safe and reliable water supply. Water supply from deep tube wells that meets the national standards; • Hygienic sanitary facilities and sewerage system; • Safe storage facilities for petroleum and other chemicals, disinfectants in accordance with ESCoPs 2; • Ensure solid waste collection and disposal in accordance with ECP1; • Implement suitable safety standards for all sub-project labors which shall not be less than those laid down on the international standards (WHO and CDC guidelines);
	Child and pregnant labor	<ul style="list-style-type: none"> • Not hire children of less than 14 years of age and pregnant women or women who delivered a child within 8 preceding weeks, in accordance with the Bangladesh Labor Code, 2006

ANNEX-4: SUMMARY OF STAKEHOLDER CONSULTATION

Discussed topics	Response	Recommendation
Minimize generated learning gaps	<p>Technical assistance and financial aids to develop contents for remote learning system, reform schooling systems during COVID-19; and implementation of national policy for school sector restoration,</p> <p>Developing communication management system (recorded mobile call in local language) with shared responsibilities both for parents/teacher.</p> <p>Develop and disseminate different contents for students of poor, vulnerable and ethnic community</p>	Addressed in the subcomponent 1.1: Develop and Disseminate Content to Prevent Learning Loss
Manage dropout rates, incidence of early marriage, adolescent fertility, and child labor.	<p>It is obvious that dropout rate in primary and secondary level is likely to increase, especially among girls and children from socioeconomically disadvantaged families due to the COVID-19 induced crises. Many households has impoverished by loss jobs and small/ medium business decimated.</p> <p>Early marriage rates increase increased, and the sexual reproductive health (SRH) system of the adolescents is under threat.</p> <p>Girl's education may lose priority and some girls may not return to school. Girls may involve in income generating activities.</p>	Emphasized in subcomponent 1.2: Communication and Outreach (Protecting health and safety, Stay in school campaign and Outreach and support for parents
Increase the rate of GBV, SH and other related violence	<p>School closure and Covid-19 related impacts increase the GBV/SH and eve teasing which exacerbate the physical and mental development of girls. Besides child abuse or physical</p>	Subcomponent 1.2: Communication and Outreach (inclusive communication and public awareness

Discussed topics	Response	Recommendation
	<p>torture increased;</p> <p>Education engagement and reengagement messages and sensitization about the socioemotional, gender-based violence (GBV)</p>	<p>campaigns, reaching out to students, parents, teachers, and communities)</p>
<p>Lack of technical resources (computer, internet connectivity) cause education gaps to the vulnerable groups, poor, disable and Chittagong Hill Tracts children</p>	<p>Prepare separate education plans, learning materials etc.</p> <p>Engage local government’s education officers, Local NGOs and teachers (SMC) to disseminate education plans with learning materials,</p>	<p>Subcomponent 1.1: Develop and Disseminate Content to Prevent Learning Loss</p>
<p>Measures need to be taken by the schools before reopening</p>	<p>Schools should follow the national/WHO/CDC guidelines for disinfecting before school reopening.</p> <p>Manage generated hazardous wastes (PPEs) and disinfecting chemicals using during school reopening,</p> <p>Engage local education groups (NGOs), local/ national education officers, SMCs to disseminate school re-opening plan</p>	<p>Addressed in the subcomponent 2.1: Support Implementation of Safe School Re-Opening Plan</p>
<p>Communicate with parents and students to re-enrolling, bringing students back to school and resuming classroom learning</p>	<p>Convey re-enrolment campaign with participate community action and awareness raising, mass demonstration with the support of CBO, LEGs, faith leaders, SMC, Community leaders (Headman, Karbari, Raajababu),</p>	<p>Subcomponent 2.2 refers support re-enrollment of pre-primary and primary Students</p>
<p>Enhance teachers capacity providing lesson with remote learning system</p>	<p>Require increase capacity on providing RL using digital equipment Requires trainings on adopting COVID-19 protocols, health and hygiene issue;</p> <p>Motivational trainings on managing children’s who are physiologically traumatized due to Covid-19;</p>	<p>Sub-component 1.3 puts emphasis on the preparedness of the local level officials, teachers, and headmasters.</p> <p>Subcomponent 2.3: Support for Assessment</p>

Discussed topics	Response	Recommendation
	Lack of direct interactions in the virtual classes which create gaps between students and teachers, Stress management on additional task via digital platforms (communicate with individual students/parents), check or evaluate through online (assignment, class test);	and Learning Recovery
Hamper mental growth of students and teachers due to long disengagement with school activities	<p>Due to the closedown of schools, students are facing learning losses and hamper education system. Students cannot interact with peers, losing opportunities of socializing which deteriorate mental growth. While in the urban area, children engage into gadgets affects mental growth, lose interests in other surrounding.</p> <p>Counseling may require children who may have developed anxieties and depression by living through the terrifying events.</p> <p>School teachers should provide proper counseling to address potential burnout issues.</p>	Provided in the sub-component 2.3 as Mental health service
Prepare for emergency situation with contingency plan	<p>Prepare contingency plan with standard operation procedures development for education service delivery during emergencies and periods of extended school closures including future crises may arise from health crises, climate change, and natural disasters;</p> <p>Capacity building of School Management Committee, teachers, local leaders and others to execute emergency situation</p>	Subcomponent 3.2: Develop Emergency Operation Procedure addressed this issue.

Participants List

Sl.	Stakeholder representing	No of Participants	Profession	Location/Area covered
1.	Civil Society	08	Upazila Education Officer (03); Businessmen; Military Officer; Private Service Holders (02) and School Administrator	Gazipur and Dhaka
2.	Parents	03	House Wife, Physician and Psychotherapist	Dhaka
3.	Student	03	Student (03)	Dhaka
4.	Teacher	07	Teacher (02), Lecturer (Chemistry), Assistant Teacher (Social Science), Head of the department of Chemistry, Lecturer (Chemistry)	Dhamrai, Savar, Manikganj and Dhaka,
5.	Development sector	02	Project Manager, World Vision	Dhaka

Sl.	Stakeholders	Number of Participants	Profession	Ethnic community	Location/Area covered
1.	Ethnic Community People	10	Banker, Government Officer (02) Development Worker (03), Teacher (03) Private sector (01)	Tanchangya (02) Chakma (04) Orawo (03) Shawontal (01)	Rangamati Dinajpur Joypurhat Khagrachori

Checklist: Stakeholder consultation and small ethnic minority community people discussion

The COVID-19 pandemic is causing profound socio-economic disruptions to countries across the world. In addition to the health and economic difficulties brought about by the pandemic, the education systems have also been severely affected. The Bangladesh COVID-19 School Sector Response (CSSR) Project will help Bangladesh tackle the learning challenges posed by this pandemic. The Project will be in the form of Technical Assistance (TA) that will be provided for developing remote learning resources/contents, communication campaigns, school re-opening plan, preparation and implementation of school sanitization plan after school re-opening, re-enrollment activities, teachers' professional development, development of standard operating procedures for emergencies and periods of extended school closures. Directorate of Primary Education (DPE) under the Ministry of Primary and Mass Education (MoPME) implement the project in collaboration with Secondary and Higher Education Division (SHED) of Ministry of Education (MoE). The Project will be financed through Investment Project Financing (IPF).

<ul style="list-style-type: none"> • How do you think that Covid-19 cause social disruption, affected children's mental growth, hampers educational activity? 	<ul style="list-style-type: none"> <input type="checkbox"/> Too much depending on digital platform <input type="checkbox"/> Changes life style <input type="checkbox"/> Cannot exchanges their thoughts <input type="checkbox"/> Get involved/addicted on video games <input type="checkbox"/> Get engage into social violence <input type="checkbox"/> Reduce appetite and mental peace <input type="checkbox"/> Lack of physical activity <input type="checkbox"/> Increase social unrest that create impact on their family <input type="checkbox"/> Forced labour among poor community <input type="checkbox"/> Increase physical and mental stress <input type="checkbox"/> Increase physical torture/harassment
<ul style="list-style-type: none"> • As schools close, do you think children who rely on school feeding programs may go hungry and malnourished? 	<ul style="list-style-type: none"> <input type="checkbox"/> Targeted student/ community supported by another program <input type="checkbox"/> Parents have been instructed to arrange nutrition feeds <input type="checkbox"/> Subsidized with financial support
<ul style="list-style-type: none"> • Lack of technical resource (computer, internet connectivity) cause serious problems to the ethnic students/ vulnerable or marginalized student 	<ul style="list-style-type: none"> <input type="checkbox"/> Lack of internet network coverage (CHT) <input type="checkbox"/> Poor financial condition to avail IT support (mobile/computer and internet) <input type="checkbox"/> Other
<ul style="list-style-type: none"> • Do you think school close increase the number of early marriage (including pregnancy), sexual harassment's, or gender based violence in the society vulnerable/marginalized and ethnic students? 	<ul style="list-style-type: none"> <input type="checkbox"/> GBV increased by the teenager/ parents <input type="checkbox"/> Student drop out increase <input type="checkbox"/> Adolescent girls get early marriage <input type="checkbox"/> Accidental pregnancy increased
<ul style="list-style-type: none"> • How the drop rates of ethnic community/ 	<ul style="list-style-type: none"> <input type="checkbox"/> Easy learning tools/ materials

vulnerable group's student can be reduced?	<input type="checkbox"/> Aware parents <input type="checkbox"/> Engage community mobilization
<ul style="list-style-type: none"> How to minimize the educational gaps created in rural area students with urban area due to the system of distance learning? 	<input type="checkbox"/> Extra class for rural area students <input type="checkbox"/> Motivate rural area students with extra care
<ul style="list-style-type: none"> What types of difficulties may student faced complete given tasks? 	<input type="checkbox"/> Sudden pressure from school <input type="checkbox"/> Cope with physical class routine <input type="checkbox"/> Return to discipline life
<ul style="list-style-type: none"> How parents faced difficulties to provide desired education to their child(en) 	<input type="checkbox"/> Overcome to reduce education gaps created <input type="checkbox"/> Assure quality education <input type="checkbox"/> Operate virtual/distance learning and physical class simultaneously
<ul style="list-style-type: none"> What measures should be taken to reduce drop out (due to financial crises/vulnerability or marginalized/ job loss, early marriage/ GBV etc.) 	<input type="checkbox"/> Aware parents <input type="checkbox"/> Motivate student <input type="checkbox"/> Community mobilization <input type="checkbox"/> Mass awareness program <input type="checkbox"/> Improve & understandable teaching materials (in multiple language) <input type="checkbox"/> Subsidy for vulnerable students <input type="checkbox"/> Available learning infrastructure (IT support) for all <input type="checkbox"/> Train teachers with digital platform
<ul style="list-style-type: none"> What benefits would school re-opening provide? 	<input type="checkbox"/> Allow students to complete their studies <input type="checkbox"/> Social and psychological well-being increase <input type="checkbox"/> Reducing risk of drop out and non-return to school <input type="checkbox"/> Allow parents to work Support vulnerable or marginalized groups with nutritious feed
<ul style="list-style-type: none"> Do you think there should be clear job responsibility to combat with the COVID-19 pandemic, protective measures for teacher, parents and others 	<input type="checkbox"/> SOP for teacher <input type="checkbox"/> SOP for parents <input type="checkbox"/> SOP for caregivers <input type="checkbox"/> SOP for cleaners <input type="checkbox"/> SOP for others
<ul style="list-style-type: none"> What would be the best solution for communication with school teacher and parents? 	<input type="checkbox"/> Leaflets/ brochures <input type="checkbox"/> Voice SMS <input type="checkbox"/> Text SMS/ E-mail <input type="checkbox"/> Social Media <input type="checkbox"/> Letter (in local language) <input type="checkbox"/> Mass media (Radio, TV or newspaper)
<ul style="list-style-type: none"> What are the key expectation to the School Management Committee/ Government or Educational Department regarding easing educational gaps 	<input type="checkbox"/> Arrange extra class for students <input type="checkbox"/> Community/ cluster based teaching <input type="checkbox"/> Aware parents to arrange house tutors <input type="checkbox"/> Others please specify
<ul style="list-style-type: none"> What are the key interventions should schools adopt before re-opening school? 	<input type="checkbox"/> Provide appropriate PPEs to the cleaners <input type="checkbox"/> Customized awareness trainings for parents <input type="checkbox"/> Capacity building for teachers <input type="checkbox"/> Administrative support from local authority <input type="checkbox"/> Train up associated cleaners, caregivers, MLSS <input type="checkbox"/> Arrange sufficient hand washing booths

	<input type="checkbox"/> Equipped with disinfection items (soap, sanitizer)
<ul style="list-style-type: none"> • What measures schools should take to reduce COVID-19 risks and operate school smoothly? 	<ol style="list-style-type: none"> 1. Daily temperature check for all school and staff 2. Proper hand washing facilities with water and soap 3. Enforced use of masks for everyone 4. Daily scheduled daily hand washing for all students and staffs 5. Frequent ventilation of classrooms 6. Disinfection of frequently-touched objects, floors, office rooms, class rooms, table, chair, desks, sitting bench and door knobs, staircases, lift button 7. Availability of hand sanitizer in all classrooms 8. Social distance marking (at least 1 meter) 9. Smaller school shifts, lunch/midday meal shifts to reduce gathering 10. Fewer number of students groups during break times 11. No larger gatherings like assemblies 12. Reduce number of students in class and increase shifts 13. Limited classroom seating to maintain social distance 14. COVID-19 testing for all staffs and students 15. COVID-19 vaccine for all staffs and students 16. Frequent cleaning of common areas like toilets, canteens, common rooms 17. Teacher and employees are training on COVID-19 related guidelines 18. Allow sick students (high risk) to study from home 19. Limited caregivers' access to school premises
<ul style="list-style-type: none"> • How do people prefer sharing updated information and awareness activities regarding COVID-19 for your children? 	<input type="checkbox"/> Information campaign for students, parents, community people <input type="checkbox"/> Awareness through prayer halls (Mosque, pagoda, temple) <input type="checkbox"/> Training <input type="checkbox"/> Leaflets (user friendly) <input type="checkbox"/> Mass media campaign (Radio, TV, Newspaper)
<ul style="list-style-type: none"> • Where did you get update information about the virus? 	<input type="checkbox"/> Media (TV, Radio) <input type="checkbox"/> Print Media (Newspaper) <input type="checkbox"/> Leaflets <input type="checkbox"/> Internet <input type="checkbox"/> Announcement <input type="checkbox"/> Prayer Halls (Mosque) <input type="checkbox"/> Local NGO <input type="checkbox"/> Mobile, SMS

	<input type="checkbox"/> Other (Please specify)
<ul style="list-style-type: none"> • What measures schools/ authority or parents should take for Emergency Response (Manmade unrest/rumors/ student unrest, natural disaster, or COVID-19 another wave)?? 	<ul style="list-style-type: none"> <input type="checkbox"/> Emergency response plan <input type="checkbox"/> Natural disaster response plan <input type="checkbox"/> Association with local administration to control agitation <input type="checkbox"/> Communicate with nearest hospital <input type="checkbox"/> Prepare plan for executing educational curriculum from remotely