Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 12/30/2019 | Report No: ESRSC01025
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tr>
<td>Pakistan</td>
<td>SOUTH ASIA</td>
<td>P172834</td>
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Project Name: Sindh Early Learning Enhancement through Classroom Transformation

Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date
Education            | Investment Project Financing | 3/2/2020               | 8/31/2020

Borrower(s) | Implementing Agency(ies)
ISLAMIC REPUBLIC OF PAKISTAN | SCHOOL EDUCATION AND LITERACY DEPARTMENT

Proposed Development Objective(s)
To improve the quality of teaching practices and student retention in early grade primary classrooms in selected districts.

Financing (in USD Million) Amount
Total Project Cost 129.99

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]
To improve the quality of teaching practices and student retention in early grade primary classrooms in approximately ten selected districts, the project aims to improve teachers' pedagogical practices, increase reading and mathematical competency of Grade 3 students, increase the number of schools and students with an improved learning environment in the early primary grades, and implement a mechanism for reducing students' early grade dropout through student attendance monitoring system. This primary be achieved through three sets of interventions. First, the project seeks to transform teaching practices in the early primary grades by reforming the school learning culture to one that is focused on students' varied learning needs, specifically related to literacy, numeracy, and socioemotional wellbeing. This will be achieved by promoting differentiated teaching practices in grades 1-3,
incorporating socioemotional support for students, and improving assessment practices. Second, improved teaching will be accompanied by improvements in the physical learning environment of primary schools through upgrading of large primary schools (grades 1-5) to elementary schools (grades 1-8), and rehabilitation and upgrading of satellite primary schools—near the upgraded elementary schools—so they can be academically functional through introduction of teacher and facilities standards. And third, to facilitate and support these changes, the project will work to improve system capacity for better leadership and management at the school, taluka, and district levels and assist them in transforming their focus from monitoring teacher compliance and enforcement of sanctions to an educational culture based on instructional support and school-level performance improvement. The project will also support improved efficiency and effectiveness in the allocation and use of resources by automating student tracking and focusing support efforts on the schools with highest needs.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The objective of the project is to improve the quality of teaching practices and student retention in early grade primary classrooms in selected ten districts of Sindh Province. The districts and exact locations of the schools are not finalized at this stage. Districts will be selected based on a set of criteria, including the need for interventions (e.g. low learning outcomes), presence of the minimum capacity for service delivery, gender and income-based equity considerations, and geographical variation for testing applicability of operational modalities, all of which are to be further discussed during the preparation phase.

Component 1 of the Project focuses on improving students’ basic numeracy and literacy skills through enhanced teaching and assessment practices, and socioemotional and parental support. Under Component 1, the Project proposes to use ICT material like procuring of Tablets for teachers and mentors for integration of technology in the learning programs. The only environmental risk associated with this Component is the possible generation of e-waste after use of tablets/gadgets that would require safe disposal. Social risks associated with this Component are related to the selection criteria for mentors to be hired for improved learning. While selecting these mentors, factors ensuring social inclusion and stakeholders’ engagement will be adhered to so that all religious and ethnic groups can be represented.

Component 2 of the Project is to Improve learning environments in early primary grades, under which the Project is supposed to upgrade or rehabilitate 900 dilapidated schools in selected ten districts. This component of the Project is likely to have environmental impacts associated with construction activities. Also, as the construction activities are within the school premises, there are potential health and safety risks for the school children and other school staff. Other than construction and rehabilitation activities, the Project will also provide drinking water facilities in schools. As the underground water available in most of the areas in Sindh is not adequate for drinking, risk of pollution poisoning, and related impacts is eminent. Given the Project plans to provide sanitation and hygiene facilities and toilets for school children, risk of soil and underground water contamination around disposal areas is present. Primary social risks pertain largely to Component 2, and relate to labor and working conditions since construction will be involved (in building and provision of missing facilities such as additional classrooms, toilets, water supply schemes, boundary walls, etc.), community health and safety especially that of school children and staff (due to construction related risks, security risks/GBV due to close interaction with Contractor’s staff/labor, water quality for water supply schemes), gender (boys versus girls schools), and vulnerable people (Sindh is home to religious and ethnic minorities, with some districts having high Hindu and low caste populations; students with disabilities are also present across Sindh), and equity and inclusion challenges associated with targeting and selection of districts, and the
actual schools. Most of Sindh is also vulnerable to floods, drought and cyclones. Rural areas in all these zones/areas have low HDI’s and incomes, due to historical neglect and remoteness, which still remains the case. Most often, there is a tendency to ignore these areas due to their locations, low political influence and higher costs of engagement/transaction costs. At the PCN stage, school selection criteria mentions that districts will be selected based on a set of criteria including the need for interventions (e.g. low learning outcomes), gender and income-based equity considerations, and geographical variation, all of which are to be further discussed during the preparation phase. Environmental and Social Safeguard studies and documents will help enrich this criteria.

D. 2. Borrower’s Institutional Capacity

The Project aims to work closely with School Education and Literacy Department (SELD) and the Reform Support Unit (RSU) under the leadership of Secretary SELD to ensure project sustainability. The project expects SELD directorates to be the technical leads of the activities and the RSU to lead the fiduciary and safeguard administration based on its extensive institutional experience in implementing various donor projects. Component 2 will be coordinated by Directorate of School Education and civil works will be led by Education Works Department under SELD. Although SELD has worked with World Bank before, the capacity for managing environmental and social safeguards is limited. The professionals who were hired during the SESP 2013-18 implementation are no longer present since these were project specific positions. As such there are no permanent employees within SELD focusing on and responsible for environmental and social safeguards. Given the project will follow ESF, the borrower will need considerable support from the Bank. During the project preparation, a detailed borrower institutional capacity assessment will be conducted and relevant measures/actions incorporated in the ESCP. Based on the results and recommendations of the capacity assessment of the borrower, SELD will need to adopt appropriate policies and recruit environmental and social experts to implement ESMPs and enhance the institutional capacity to manage environmental and social aspects and issues that are materially consistent with ESF.

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The Environmental risk rating of the Project is moderate. The project involves small to medium scale construction activities in 900 schools across ten districts of Sindh province. The Project has scattered geographical area, where the environmental risks are associated only with Component 2 of the Project which involves civil works in schools. The construction activities planned under the Project are temporary, with localized civil works within the school and of reversible nature that could be mitigated through development of adequate safeguards instruments. The other Project Components are soft in nature and do not anticipate any environmental risk. Due to close interaction of the Project with the school children, the Project needs to consider stringent Occupational, Health and safety considerations at planning stage. However, due to localized nature of activities to be taken place within the school premises and considering development of adequate safeguards instruments at place by the Client, the Project is categorized as of moderate risk.

Social Risk Rating

The potential adverse impacts on human population are limited given that the project involves small to medium scale construction works at school level spread over the province of Sindh. There are certain risks associated with GBV,
labor, and community health and safety, but these are localized and site specific. These risks will be mitigated through incorporating suitable provisions in contract documents and project design. Thus, the limited adverse impacts and risks can be mitigated in a predictable manner. In view of this, the social risk is rated as moderate, at PCN stage.

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:

Environmental Risks: Component 1 of the Project focuses to improve students’ basic numeracy and literacy skills through enhanced teaching and assessment practices, and socioemotional and parental support. Under Component 1, the Project is proposing to use ICT material like procuring of Tablets for the teachers and mentors for integration of technology in the learning program. The only environmental risk associated with this Component is the possible generation of e-waste after use of tablets/gadgets that’s needs to be reused or recycled at the end of the Product use.

Component 2 of the Project includes rehabilitation of 900 schools that can have potential temporary environmental risks associated during construction activities. It is anticipated that two to three class rooms and one or two toilet facilities shall be constructed in 900 schools that would be pre-selected with minimum base infrastructure available. Safe water drinking facilities shall also be provided where it is missing in the selected schools. The anticipated environmental risks during construction activities include generation of dust which can have negative impacts on the air quality of surrounding areas and can adversely impact the health of school children and nearby communities. Risk associated with noise generation from the construction activities can cause disturbance within the school and to the households located in close vicinity to the schools. Construction activities also generate solid waste (including debris, plastics, organic food waste, packaging material etc.) that needs to be properly disposed off during construction and also the area needs to be cleaned properly after completion of activities. The wastewater sludge from construction material can temporarily contaminate the soil, if not properly managed. Health and safety risk associated with fallen objects like bricks, tools debris during loading, unloading or during construction can cause potential injuries to the workers and any passerby. The exposure of construction material (cement, asbestos, sand, debris) to the Children (in particular) is also a major concern to be taken care to prevent any unavoidable incident. Though asbestos is not been used in Pakistan for Government buildings including schools, the selected schools shall be screened for the use of asbestos before Project implementation. If asbestos use is suspected in any of the selected schools, ESMF of the Project will incorporate asbestos management procedure to ensure safe handling of asbestos during repairs work and prohibited for new construction.

There is some additional traffic anticipated at school sites during construction for transportation of material, that could have potential impacts on the safety of the school children. The health risks associated with chemical exposure to children from paints, glues, varnishes, floor strippers, urethans etc. also needs to be considered. There are some minor risks associated with the enhanced food supply to the contractor’s workers which can bring unwanted intruders in school premises including bugs, rodents, roaches, rats etc.

Social Risks: In order to respond to social risks mentioned earlier, particularly under ESS1, a social assessment will help in enriching the school selection criteria, bringing inclusion and equity concerns in its ambit, and improve targeting hence. Amongst other equally important equity issues, the possibility for discrimination in constructing and
equipping girls schools as compared to boys schools (and training opportunities for female teachers vs male teachers) will be assessed. The Assessment will also help identify challenges associated with discrimination, if any, in education systems due to caste, ethnicity and religious orientation, and suggest appropriate responses. The findings can be used to design a learning program for teachers, students, parents and communities at large. The Assessment can also explore the possibilities and efficacy of having parents-teachers school councils in improving learning outcomes, enrolment and retention. Suggestions on improving the school environment and learning tools for students and teachers with disabilities will also be a part of this Assessment. In addition, a GBV and gender analysis would help identifying risks of GBV, and suggest mitigation measures, not only for the construction phase, but also to be considered in the learning program mentioned above. The GBV risks will be analyzed and rated and mitigation measures and action plan will be developed based on the relevant Good Practice Note.

Considering various number of environmental and social risks associated with the Project (mainly under Component 2) and due to the unknown sites, the Client will conduct and ESA, to prepare an Environmental and Social Management Framework (ESMF) in compliance with ESS1 requirements including a detailed Social Assessment (as part of the ESMF) for the Project to identify all the risks associated with the Project and preparing framework to mitigate all those risks. The ESMF of the Project shall be reviewed, cleared and disclosed by the bank.

Areas where “Use of Borrower Framework” is being considered:
At PCN stage, use of borrower framework is not recommended for any Standard.

ESS10 Stakeholder Engagement and Information Disclosure
SELD will identify project affected parties and other interested parties as part of the stakeholder identification and analysis process, preferably by using independent third-party specialists (recommended but not critical to the achievement of the ESF objectives). These specialists will provide support to conduct a comprehensive analysis and help design an inclusive engagement process.
At the PCN stage, potential stakeholders identified are, i) SELD and all its relevant Directorates ii) District level Education Department staff of selected Districts iii) Teachers Association/Union of Sindh, iv) Parents and students, represented by community representatives/platforms (village level community institutions), NGO and activists working in the education sector in Sindh vi) Academia working on Education Sector Reforms in Sindh, vii) People with disabilities, viii) Sindh Water and Sanitation Department, ix) Sindh Environmental Protection Agency and x) PDMA Sindh.
SELD will develop a Stakeholder Engagement Plan (SEP) in consultation with the World Bank, which will describe the timing, frequency and nature of engagements with the identified stakeholders throughout the Project life. Since this project impacts teachers and students as a whole, engagement with civil society platforms, parents, people with disabilities, and citizens representative will have to be extensive and meaningful. SEP will also highlight methods to involve citizens voices and feedback into the Project implementation and will suggest differentiated measures of engagement across Sindh.
The document will be prepared and disclosed by the client and task team prior to Appraisal.

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

Since the project involves setting up of a PIU and small to medium level construction which will be carried out by independent contractors, across ten different districts with varied contractor capacities, ESS2 is relevant. Potential categories of workers identified at PCN stage are:

a. Direct workers employed by the borrower
b. Contracted workers
c. Primary supply workers

LMP will be prepared to safeguard work environment for all the above mentioned workers, and will aim to ensure labor security and welfare, and working conditions as per requirements of ESS2. The LMP will be prepared in close coordination with the Procurement staff of the client, and contractor level LMP and Codes of Practice will be prepared and added to all relevant contracts. LMP will be prepared by a consultant hired by the client, and will be disclosed by the client and task team.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is relevant as the Project is likely to involve emission of air pollutants, use of fuels and other chemicals, and potential contamination of land and water during construction activities. As the Project is located in Sindh where water quality is not adequate at most of the places, there is a major risk associated with the quality of drinking water supplied to the schools. It is important to conduct water quality assessment and monitoring of the schools where the Project is going to provide safe drinking water facility. Water quality assessment and monitoring procedure will be included in ESMF. The schools where the Project is providing WASH facilities, there could be a risk associated with disposal of waste due to lack of proper drainage systems in many of the schools in Sindh. Therefore, proper disposal and drainage system needs to be devised for such schools to avoid any risks of soil and under ground water contamination associated with poor drainage systems. During the civil works, the Project is anticipated to generate construction waste including solid waste (packaging material, debris, organic waste etc) and waste water. The ESMF shall also include measures for proper disposal of construction waste and waste water. The Client will also screen for the use of Asbestos in the selected schools and if it is found to be used in any of the previously constructed school buildings, the Client will also prepare an Asbestos Management Procedure which will ensure safe handling of asbestos during rehabilitation and safe practices for disposal and for any new construction, asbestos use shall be banned.

The potential impacts on those risks and impacts will be assessed in ESMF prepared by the Client and necessary mitigation measures will be proposed.

ESS4 Community Health and Safety

ESS4 is relevant due to multiple reasons at the PCN stage. Since Sindh is located in high flood risk zone, existing school buildings, and all additional classrooms/buildings need to be screened against safety protocols suggested by the Sindh Provincial Disaster Management Authority (PDMA). PDMA has clustered districts of Sindh on the basis of various disaster types, and recommends corrective actions. School building designs will need to comply to the same.
Also, the construction activities under Component 2 of the Project can have negative impacts on the school children and staff within the school premises and also to the nearby communities due to increase in air pollution, dust and noise. Increased traffic at school sites can also pose risks to the safety of the school children and nearby communities. A traffic and road safety plan will be prepared and effective road safety measures, proportional to the scope of the project, will be incorporated in the ESMF, in accordance with acceptable norms and as per the WBG EHS guidelines. In addition, exposure (and interaction in some cases) of school children and teachers with labor and other construction staff poses a security risk, including that of GBV, harassment, culturally inappropriate behavior, etc. and the risk of conflict with local communities due to the mentioned risks and otherwise. Accidents and incidents reporting toolkit will also be prepared as a part of ESMF, and incorporated into the ESCP, which will be reported upon, and monitored. In addition, potential emergency situations associated with construction activities and natural and manmade hazards will be identified.

In order to mitigate the above, a Community Health and Safety Plan covering the community health and safety aspects of the project such as infrastructure design, safe water supply, and traffic and road safety will be prepared by the client, as part of the ESMF under which regular safety inspection will be carried out. The Plan will identify potential safety hazards and risks, and will propose necessary mitigation actions. Emergency Response Plan, proportionate to the risks, will be incorporated in the ESMF, which will include early warning systems, evacuation plans, fire safety plans etc. Such a Plan is required as contractors and schools lack emergency response planning in general as per practice. The implementation will be part of the ESCP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
ESS5 is not relevant as the project will work at existing school locations which are property of the Government, and which do not require any additional land acquisition.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
ESS6 is not relevant. The Project activities are planned within the premises of already constructed school buildings, therefore no impacts on biodiversity conservation and natural resources are anticipated.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
ESS7 is not relevant, as there are no Indigenous Peoples living in Sindh (area of operation).

ESS8 Cultural Heritage
ESS8 is relevant. There is no archeological, cultural or religious site to be affected by this Project as the Project activities are to occur within the existing schools. But as the Project involves digging and excavation activities, Chance Find Procedure will be prepared and made part of the ESMF. The same procedure will be included in works contracts and in the bidding document requiring contractors to stop construction if cultural heritage is encountered during any work and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage.
ESS9 Financial Intermediaries

ESS9 is not relevant as the Project does not involve any FI.

C. Legal Operational Policies that Apply

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<th>Policy</th>
<th>Relevance</th>
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<tr>
<td>OP 7.50 Projects on International Waterways</td>
<td>No</td>
</tr>
<tr>
<td>OP 7.60 Projects in Disputed Areas</td>
<td>No</td>
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III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?  No

Financing Partners
None

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

Actions to be completed prior to Bank Board Approval:

All the following documents need to be completed and disclosed, prior to Appraisal:
1. Preparation of and disclosure Stakeholder Engagement Plan (SEP)
2. Preparation and disclosure of Environment and Social Commitment Plan (ESCP)

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

1- SELD will nominate managerial level staff to serve as focal point for ESCP revisions (if any) and implementation
2. SELD will prepare and disclose ESMF, including Asbestos Management Procedure, Social Assessment, Community Health and Safety Plan and Labor Management Procedures (LMP)
3- SELD will hire Environment and Social Specialists (consultant), to support implementation of Environmental and Social Safeguards requirements, as determined by the above mentioned studies.
4- SELD will conduct site specific environmental and social screening followed by preparation of site specific ESMP including GBV action plan
6- SELD will formulate and operationalize project specific GRM, GBV GRM and worker specific GRM
7- Responsibilities, resources and timelines to implement and monitor all the above documents and procedures

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 02-Mar-2020
IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: ISLAMIC REPUBLIC OF PAKISTAN

Implementing Agency(ies)

Implementing Agency: SCHOOL EDUCATION AND LITERACY DEPARTMENT

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Shinsaku Nomura, Shahram Paksima, Manal Bakur N Quota

Practice Manager (ENR/Social) David Seth Warren Recommended on 19-Dec-2019 at 15:18:2 EST

Safeguards Advisor ESSA Agi Kiss (SAESSA) Cleared on 30-Dec-2020 at 16:48:24 EST