

Public Disclosure Authorized

EDUCATION PROGRAM FOR RESULTS:
ADDITIONAL FINANCING
(P173091)

Public Disclosure Authorized

**ADDENDUM TO THE ENVIRONMENTAL AND SOCIAL
SYSTEMS ASSESSMENT**

DRAFT REPORT

JUNE 5, 2020

Abbreviations and Acronyms

AF	Additional Financing
COVID-19	Coronavirus Disease 2019
DLI	Disbursement-Linked Indicator
DLR	Disbursement-Linked Result
ECE	Early Childhood Education
EHS	Environmental Health and Safety
EMIS	Education Management Information System
ESMP	Enhanced School Management and Planning
ESSA	Environmental and Social System Assessment
E&S	Environment & Social
ESP	Education Strategic Plan
GCF	Global Concessionary Financing Facility
GIS	Geographical Information System
GOJ	Government of Jordan
GRM	Grievance Redress Mechanism
GPA	Grade Point Average
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
IPF	Investment Project Financing
ISR	Implementation Status and Results
JERS	Jordan Education Reform Support
JOD	Jordanian Dinar
K-12	Kindergarten to grade 12
KG	Kindergarten
LAL	Land Acquisition Law
MPWH	Ministry of Public Works and Housing
MOE	Ministry of Education
MOF	Ministry of Finance
MOPIC	Ministry of Planning and International Cooperation
NGO	Non-Governmental Organization
NTPS	National Teacher Professional Standards
OHS	Occupational, Health, and Safety
OOSC	Out of School Children
PDO	Project Development Objective
PAP	Program Action Plan

PforR	Program-for-Results
PPP	Public-Private Partnership
QA	Quality Assurance
RA	Result Area
RF	Results Framework
SDDP	School and Directorate Development Program
TOR	Term of Reference
TA	Technical Assistance
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UNDP	United Nations Development Program
USAID	United States Agency for International Development
US\$	United States Dollar
WASH	Water, Sanitation and Hygiene
WB	World Bank
WEEE	Waste Electrical and Electronic Equipment

Executive Summary

Background: In December 2017, the World Bank approved financing of the parent Jordan Education Reform Program for Results (PforR) to the Government of Jordan, in support of the Ministry of Education's Education Strategic Plan 2018-2022 (ESP). The operation's Program Development Objective (PDO) is to expand access to early childhood education, and to improve student assessment and teaching and learning conditions for Jordanian children and Syrian refugee children.

Already before the COVID-19 pandemic, the MOE sought to redouble its efforts in several RAs, prompting the need for the Additional Financing (AF). The AF also now supports the government's Emergency Response Plan to COVID-19 pandemic that is focused on providing technology and interactive distant and blended learning environments for students, and provide sustainable support during COVID-19 and other emergency crises.

The proposed changes under the additional financing are as follows:

- **Result Area 1:** To accelerate access to quality KG2, the DLIs have been adjusted in their scope to provide a clear and sustainable pathway towards KG2 expansion; and the targets have been scaled up
- **Result Area 2:** The scope of this RA will be expanded to allow for a more comprehensive approach to improving teaching and learning conditions.
- **Result Area 3:** The scope and targets have been adjusted to provide a clear pathway for *tawjihi* exam reform.
- **Result Area 4:** In light of the experience with the COVID-19 pandemic, a new DLI (DLI8) was introduced to support MOE's education response during emergencies. The AF will incentivize the development of a blended learning strategy covering various modalities, including virtual and physical learning to ensure the digital gap does not further exacerbate the learning gap across socioeconomic levels and for Syrian refugees

In accordance with World Bank OP 9.0 for Program for Results financing, the World Bank conducted its an Environmental and Social Systems Assessment (ESSA) for the parent Jordan Education Program for Results (PforR) was prepared for the parent program, and disclosed in December 2017¹. The purpose of the ESSA was to provide (a) a summary of environmental and social risks and benefits associated with proposed activities required to achieve the Program Development Objective (PDO) and the Disbursement Linked Indicators (DLIs) for each results area; (b) an assessment of the borrower's environmental and social management systems which apply to these activities, their risks and benefits; (c) an evaluation of the borrower's performance and track record in implementing its environmental and social management systems; (d) an assessment of the extent to which the borrower's environmental and social management systems are consistent with the Bank's core environmental and social principles spelled out in Bank policy and associated guidance materials; and (e) a set of recommendations and actions which the borrower has agreed to undertake to improve the implementation of applicable systems. World Bank PforR Programs

¹ World Bank Program-for-Results, Jordan Education reform support program, [ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT \(ESSA\)](#)

must comply with the Bank Policy for Program for Results Financing², which includes a set of (6) core environmental and social principles.

The ESSA Addendum comprises: 1) an assessment of the ongoing relevance of the parent ESSA, including any changes to the activities, risks or benefits under the parent program; 2) any new risks or benefits associated with new activities under the Additional Financing (AF); 3) changes to borrower environmental and social systems; 4) evaluation of the borrower's environmental and social performance and track record to date in delivering the program 5) recommendations for actions to be taken by the borrower.

The risks, impacts, activities and benefits of the parent program as outlined in the parent ESSA are all still relevant to the parent and AF. The PDO and program boundaries remain unchanged. The program continues to expand access to early childhood education, and to improve student assessment and teaching and learning conditions for Jordanian children and Syrian refugee children. The AF does not introduce any new significant adverse environmental and social impacts.

Physical works, and associated environment, health and safety and land-risks under the program are still mainly linked to Result Area 1. The program supports classroom expansions indirectly, through increased enrollment of Syrian children (DLI1) and directly through refurbishment and extension of KG2 classrooms for all children (DLI2). DLI2 has been scaled-up under the AF. Construction of new schools are excluded from the program. Minor health and safety upgrades (e.g. improved ventilation) within school buildings to adapt to COVID -19 contagion risks are linked to DLI6 under the AF. It's important to note that the parent ESSA captured new school constructions erroneously in the scope. This addendum will therefore focus on the risks and impact of school expansions and classroom refurbishments consistent with the program boundaries.

The social risks of the program are considered substantial: The social risks under the proposed additional financing will remain "Substantial" primarily owing to land-related risks of the parent and additional financing. While the program excludes construction of new schools, Result Area 1 supports expanded enrollment of Syrian refugee children at all levels, and for all children in refurbished and extended KG2 classrooms, primarily on existing school lands. Land acquisition is minimized by constructing on existing MOE lands wherever possible, and the MOE also uses other strategies to increasing enrollment (e.g. increase class size), but school expansions in some cases entail swapping of land between ministries, or acquiring adjacent parcels from private land owners on a willing-buyer willing seller basis. There are also risks related to informal land users which are not recognized under Jordanian Land Law, even when constructing on MOE lands. A land acquisition audit will be conducted by the World Bank by October 2020, and Standard Operating Procedures (SOP) will be prepared by MOE based on the audit recommendations by December 2020. The SOP will cover screening and implementation procedures for land acquisition and compensation in order to adhere to the PforR Core Principles.

The program also entails risks related to community health and safety. Positive impacts are expected from the AF interventions in support of MOE's COVID-19 emergency response plan to install new hygiene facilities in schools, and provide virtual learning methods for remote learning. Health and safety risks might arise for children and public from hazards during construction of extensions and refurbishments, and proximity to work crews. Health and Safety requirements will be incorporated into standard procurement documents for civil works under the program and the capacity of the MOE on Health and Safety will be augmented.

² [Bank Policy Program for Results Financing, November 10, 2017](#)

The broader social risks associated with the Program as identified in the Environmental and Social Systems Assessment for the parent program, remain relevant for the AF. These risks are contextual in nature such as violence in schools (various forms), gender biases in school curriculum or teaching, inadequate support to children with disabilities and special needs, vulnerability and psychological distress among poor Jordanians and Syrian refugees leading to negative coping strategies such as child labor, early marriage, and begging which may contribute to children dropping out. The government's program for universal KG2 under the additional financing may decrease risks related to inclusion and access and may exacerbate others if classrooms are overcrowded or licensing processes for new KGs are weak. The program incorporates several preventative interventions, such as social-emotional learning, and quality assurance measures that have been assessed.

Environmental risks are considered Moderate. The environmental risks under the proposed additional financing remain 'Moderate' as rated in the original program since it supports similar physical activities (i.e. classroom expansion through refurbishment of available spaces in existing schools or construction of new classrooms/ child-friendly restrooms/ playgrounds extension on schools' available land). These activities are expected to result in low to moderate impacts on air, water, and soil quality as well as on workers and adjacent communities health and safety (including students and teachers) during construction. During school operation, impacts could be associated with water supply and sanitation, solid waste management and maintenance needs. The upgrading of the WASH facilities and the basic rehab of school building (installation of heating/ cooling systems, electric maintenance, paint) may also result in similar type of impacts but it would be limited, temporary and easy to mitigate. The impacts of the potential resultant e-waste associated with the end of use disposal of IT equipment utilized by the project (e.g.: digitization of competency-based Tawjihi exam and distant e-learning) would be low as the amount of generated e-waste would be insignificant compared with that generated in Jordan. Digitization will result in paperless exam and learning and thus reduces carbon footprint associated with paper production (cutting trees, use of chemicals, energy, etc.) and generation of waste.

Borrower environmental and social management systems: No significant changes in the applicable federal and governorate environmental and social regulatory requirements pertaining to activities under the program have been identified. The MOE has augmented its capacity in the area of land management since program the start of implementation; the department has additional officers and GIS capabilities. Environment, and occupational health and safety provisions are not always adequately observed, particularly during construction activities. Therefore, more capacity building is needed to enhance the MOE E&S safeguards performance and reporting including OHS training, EHS incidents/accident reporting.

It is noted that USAID's Enhanced School Management Program is running concurrently and is expected to significantly assist in improving the school planning and overall construction management functions, including environmental, health and safety and overall quality. Other international donors are active in school construction and together with NGO's are supporting MOE in areas of gender and school climate and many other areas.

In terms of e-waste management, the MOE has in place an internal protocol for the collection of old unused equipment in schools and refurbishment by a local non-profit organization for reuse by charities. There are no specific regulations on e-waste in Jordan. The Ministry of Environment deals with the e-waste under the broader category of hazardous waste (bylaw 24/2005 and instruction for hazardous waste management and handling- 2003). Moreover, the Ministry of Environment operates a hazardous disposal facility in Swaqa site (located approximately 120 Km southeast of Amman) and has set up a center in this facility to oversee the safe disposal of electronic waste to discourage improper storage and illegal

re-selling and dismantling activities. In addition, some e-waste recycling activities are carried out by the local private sector (such as Jocy, ETafkeek).

Borrower Performance and Track record: The Environmental and Social Performance of the program is rated Moderately Satisfactory primarily owing to delayed completion of Program Action Plan requirements to prepare and implement E&S Standard Operating Procedures (SOP), as well as the gender-related actions. Despite the unfulfilled requirements, the program continues to operate in conformance with national requirements, and is pursuing many different gender initiatives Efforts to improve E&S performance that have been built into the AF are as follows: 1) the Program Action Plan requirements have now been realigned and refined to reduce overlap with other donors' programs and be more suited to MOE needs 2) the development of the SOPs will be supported with technical assistance 3) increase capacity building in areas such as health and safety and GRM are included in the Program Action Plan 4) E&S performance management requirements are build-in to DLRs and associated verification protocols. It is also noted that USAID's Enhanced School Management Program is running concurrently with the PforR and is expected to significantly assist in improving the school planning and overall construction management functions, including environmental, health and safety and overall quality. Other international donors are active in school construction and together with NGO's are supporting MOE in areas of gender and school climate and many other areas.

Stakeholder Engagement: The environmental and social risks and benefits of the program restructuring and scale up have been consulted with international development partners and UN agencies including UNICEF, Save the Children, and the Norwegian Refugee Council from December – February 2020. The program design and its strong focus on improving the learning environment in schools in general and particularly those with a large share of Syrian refugees, is reflective of the input from these consultations. Numerous departments within the Ministry of Education, during the weeks of February 6-14, 2020 were also consulted. The ESSA was consulted with MOE and MOPIC on June 2, 2020. The ESSA Addendum will be further disclosed on the World Bank and MOPIC website by program appraisal and hard copies will be made available at MOE Field Directorate Offices. The ESSA will be further consulted with other external stakeholders such as parents and communities during program implementation.

The program incorporates mechanisms that MOE will use to engage with other stakeholders and beneficiaries during program implementation including deployment of a Communication Strategy (a PAP requirement). There is a dedicated Stakeholder Engagement Program for the reform of the Tawjihi System.

The MOE has an operational GRM that will be strengthened. The GRM accepts complaints from the public, teachers and staff, and students. In addition, it receives complaints from the nation-wide GoJ "at your service" application. The MOE system, through the various uptake channels, logged 4211 complaints in 2019, of which 3514 are recorded as resolved. The MOE is designing a new electronic complaint system that will be accessible through email, or app. The system is in final stage of preparation including the design of the screens and internal system. The system is designed to address key challenges such as 1) confidentiality 2) accessibility 3) Cost and time of verifying validity complaints i.e. eliminating malicious complaints) and resolving complaints. The system is supposed to be piloted this year and running in 2021. The Program Action Plan contains measures to strengthen the capacity of MOE GRM Systems, specifically the completion of the installation of the electronic complaint system and training for the GRM unit, supported by Technical Assistance.

Recommendations: The environmental and social risks of the program are considered to be adequately mitigated, through DLIs and associated verification protocols (Table 1), committed actions in the Program Action Plan (Table 2), or through inputs to terms of reference in Technical Assistance. All the following

recommendations are the responsibility of MOE as the implementing agency and will be supervised throughout bank implementation:

Table 1: Recommended Actions through DLIs to Strengthen Environmental and Social Management Systems

RA/ DLI	Completion & Verification Measurement
RA1: Expanded access and improved quality of early childhood education	
The infrastructure Assessment of public schools identifying the construction/small works required to create additional KG2 classrooms and associated costs will include: a) the technical and financial feasibility of upgrades for disability access to these classrooms b) the land-related risks associated with the primary school where the classroom extension will occur, as determined by the application of the Standard Operating Procedure for Land Acquisition	DLR 2.3b-2.4b and related verification procedure
The Action Plan outlining the detailed implementation plan and timeline for the expansion of public KG2 services, will include corrective measures, consistent with Core Principle 4, to resolve land-related risks identified in the Infrastructure Assessment	DLR 2.3b-2.4b and related verification procedure
The Quality Assurance Standard applicable to all public and private licensed classrooms under the program that will include measures to protect child physical and emotional health and safety such as i) potential for discrimination on the basis of race, sex, religion, language, color, origin or disability (ii) equal access for vulnerable groups such as physically disabled children (ii) potential exposure of children to violence or abuse (iv) health and safety of children including food safety, sanitation and hygiene, and exposure to communicable diseases (v) structural requirements and specifications for fire, water, sanitation, safe play areas	DLR 3.4/inputs to TOR for TA
The technical design specifications of the PPP model will make reference to the QAS and any other applicable E&S requirements to be verified by the Program verification process	DLR 2.4c Verification Protocol
RA2: Reformed student assessment and certification system	
Ensure gender sensitive and responsive approach to the design of and piloting of a school program for improving school climate and student socioemotional learning, including considerations of gender-based violence	included in the Terms of Reference for Technical Assistance supporting DL15
RA3: Reformed student assessment and certification system	
Design and implement a comprehensive Stakeholder Engagement Plan for the reform of the Tawjihi System	DLR 7.3-DLR7.4

Table 2: Recommended Items for the Program Action Plan to Strengthen Environmental and Social Management Systems (and Status of E&S Actions under the Parent Program Action Plan)

No	Program Action Plan (Parent PforR)	Due Date	New/ Revised Action (AF)	New Date	Completion Measurement
1	Environmental and Social Standard Operating Procedures and Guidelines including different measures to bridge identified gaps adopted	March 2018	a) Prepare an Environmental, Health and Safety Guideline and Standard Procurement Document (Employer’s Specification) to be applied to all civil works for refurbishment and extension of KG2 classrooms under the program. The specification will also cover measures to protect workers against COVID-19 risks and the public, especially children, including a Code of Conduct for workers. The Guideline will also include an awareness module for schools on safety such as fire, playgrounds, floods (Supported by TA).	December 2020	Environmental, Health and Safety Guideline is prepared and Employer’s Specification that is incorporated into MOE Standard Procurement Documents.
			b) Prepare and Implement Corrective Action Plan based on the World Bank Land Acquisition and Economic and Physical Displacement Audit and Standard Operating Procedures for Land Acquisition and related processes.	December 2020	Corrective actions complete and SOP prepared.

No	Program Action Plan (Parent PforR)	Due Date	New/ Revised Action (AF)	New Date	Completion Measurement
2	Enhancing the capacity of MOE staff and respective partners to mainstream gender in program activities	2019	Provide enhanced training programs and courses to field directorate staff on gender and equality concepts and mainstreaming gender and equality in their daily work.	December 2023	TBD
3	Reducing gender biases and stereotypes in teacher training	December 2020	Integrate training on gender-responsive pedagogy in teacher training for both male and female teachers and teacher trainers of all specializations (Includes guidelines for classroom management).	December 2021	TBD
4	Developing gender-sensitive guidelines for classroom management		Included in 3.		NA
5	Supporting teachers to provide a safe learning environment for girls and boys	December 2020	Ensure gender sensitive and responsive approach to the design of and piloting of a school program for improving school climate and student socioemotional learning, including considerations of gender-based violence (supported by TA for Socio-emotional learning)	December 2021	TBD
6	NA	NA	(NEW) Ensure expertise is present in the appropriate departments through extensive training or recruitment to oversee occupational health and safety in construction and implement hygiene measures in schools to prevent COVID-19 contagion risks	March 2021	Position created and filled
6	NA	NA	(NEW) Deliver training to GRM unit on mediation skills (supported by TA)	March 2021	Training delivered

No	Program Action Plan (Parent PforR)	Due Date	New/ Revised Action (AF)	New Date	Completion Measurement
7	NA	NA	(NEW) complete design review and installation of electronic GRM platform (supported by TA)	December 2021	System is operational and logging complaints

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1. Introduction

1.1 Background

In December 2017, the World Bank approved financing of the parent Jordan Education Reform Program for Results (PforR) to the Government of Jordan, in support of the Ministry of Education's Education Strategic Plan 2018-2022 (ESP). The operation's Program Development Objective (PDO) is to expand access to early childhood education, and to improve student assessment and teaching and learning conditions for Jordanian children and Syrian refugee children.

Already before the COVID-19 pandemic, the MOE sought to redouble its efforts in several Results Areas, prompting the need for the Additional Financing (AF). The AF also now supports the government's Emergency Response Plan to COVID-19 pandemic that is focused on providing technology and interactive distant learning environments for students. .

and provide sustainable support during COVID-19 and other emergency crises.

The proposed changes under the additional financing are as follows:

- **Result Area 1:** To strengthen the Government's efforts to accelerate access to quality KG2, DLIs 2 and 3 will be: (a) adjusted in their scope to provide a clear and sustainable pathway towards KG2 expansion; and (b) scaled up in their proposed targets to reflect the more ambitious nature of the Government's ECE agenda
- **Result Area 2:** The scope of this RA will be expanded to allow for a more comprehensive approach to improving teaching and learning conditions. The original DLIs focused on improving school maintenance practices, capacity and incentive structures for teachers and school leaders, and fostering positive student and teacher relations and behaviors.
- **Result Area 3:** To strengthen support for the Government's efforts to improve student assessment, DLI7 will be expanded in scope and adjusted in terms of targets with a focus on providing a clear pathway for *tawjihi* exam reform.
- **Result Area 4:** In light of the experience with the COVID-19 pandemic, DLI8 was introduced to support MOE's education response during emergencies. The AF will incentivize the development of a blended learning strategy covering various modalities, including virtual and physical learning to ensure the digital gap does not further exacerbate the learning gap across socioeconomic levels and for Syrian refugees

1.2 Purpose of the ESSA Addendum

In accordance with World Bank OP 9.0 for Program for Results financing, the World Bank conducted its an Environmental and Social Systems Assessment (ESSA) for the parent Jordan Education Program for Results (PforR) was prepared for the parent program, and disclosed in December 2017³. The purpose of the ESSA was to provide:

³ World Bank Program-for-Results, Jordan Education reform support program, [ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT \(ESSA\)](#)

- (a) a summary of environmental and social risks and benefits associated with proposed activities required to achieve the Program Development Objective (PDO) and the Disbursement Linked Indicators (DLIs) for each results area;
- (b) an assessment of the borrower's environmental and social management systems which apply to these activities, their risks and benefits;
- (c) an evaluation of the borrower's performance and track record in implementing its environmental and social management systems;
- (d) an assessment of the extent to which the borrower's environmental and social management systems are consistent with the Bank's core environmental and social principles spelled out in Bank policy and associated guidance materials; and
- (e) a set of recommendations and actions which the borrower has agreed to undertake to improve the implementation of applicable systems.

World Bank PforR Programs must comply with the Bank Policy for Program for Results Financing⁴, which includes a set of (6) core environmental and social principles:

- Core Principle 1: E&S Sustainability and Risk Avoidance, Minimization and Mitigation
- Core Principle 2: Avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources
- Core Principle #3: Protect public and worker safety
- Core Principle #4: manage land acquisition and loss of access to natural resources to avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards
- Core Principle #5: (Social Inclusion) Due consideration for equitable access to Program benefits, giving special attention to vulnerable groups
- Core Principle #6: Avoid exacerbating social conflict,

This Addendum comprises an assessment of the ongoing relevance of the ESSA, including 1) any changes to the risks or benefits identified 2) any new risks or benefits associated with new activities under the Additional Financing (AF) 3) changes to borrower environmental and social systems 4) evaluation of the borrower's environmental and social performance and track record to date in delivering the program.

⁴ [Bank Policy Program for Results Financing, November 10, 2017](#)

2. Program Description

This Program Paper seeks the approval of the Executive Directors to provide an additional loan in the amount of US\$100 million to the Hashemite Kingdom of Jordan Education Reform Support Program-for-Results (P162407, Loan Number 88040-002 JO and GCFF Trust Fund Number TF0A6420-JO). Furthermore, the Program Paper describes restructuring of the original JERS PforR and its extension by 2 years, resulting in a new financing closing date of May 31, 2025. The entire additional loan will be results-based using DLIs, so that the TA IPF amount remains at US\$8 million for the combined original PforR and AF. Nonetheless, given savings achieved during the ongoing implementation of TA activities under the original PforR, it will be possible to introduce new TA activities to support AF interventions within the overall US\$8 million envelope (see Annex 6).

CHANGES UNDER RESULT AREA 1: EXPANDED ACCESS AND IMPROVED QUALITY OF EARLY CHILDHOOD EDUCATION

To strengthen the Government's efforts to accelerate access to quality KG2, DLIs 2 and 3 will be: (a) adjusted in their scope to provide a clear and sustainable pathway towards KG2 expansion; and (b) scaled up in their proposed targets to reflect the more ambitious nature of the Government's ECE agenda. Under DLI2 of the original PforR, US\$15 million were allocated towards the enrolment of 30,000 additional children in KG2. The AF will provide an additional US\$31 million to incentivize critical activities to sustainably expand public and private KG2 provision and enable the Government to achieve a more ambitious enrolment target. A DLR has also been included to strengthen the Government's ECE preparedness in case of a COVID-19 relapse (or other crises that result in school closures). Under DLI3 of the original PforR, US\$27 million were allocated towards improving the quality assurance system for KG2. Although no additional resources are made available under the AF, DLRs were restructured to more clearly incentivize the licensing of informal KG2 providers - a strategy that will both ensure a minimum level of quality and increase access to KG2 services. In addition, the timeline for other DLRs will be extended to ensure their achievement. The DLIs associated with this RA are:

- (a) DLI2: Expansion of KG2 services
- (b) DLI3: Improved quality assurance system for KG2

CHANGES UNDER RESULT AREA 2: IMPROVED TEACHING AND LEARNING CONDITIONS

The scope of this RA will be expanded to allow for a more comprehensive approach to improving teaching and learning conditions. The original DLIs focused on improving school maintenance practices, capacity and incentive structures for teachers and school leaders, and fostering positive student and teacher relations and behaviors, with an allocation of US\$54 million. Given the substantial effects the COVID-19 pandemic has had on education service delivery as well as teacher, student, and family well-being, this RA will be revised to (a) improve the knowledge and understanding of student behavior across all public schools and institutionalize policies and practices to maintain positive teaching and learning conditions, and (b) provide an improved, healthy, and safe physical learning environment once students return to schools. The AF will provide an additional US\$22 million to this RA. DLI4 remains largely unchanged and focused on teacher professional development and well-being. DLI5 now provides a sequencing for the sustainable collection and use of socioemotional data and incentivizing the piloting of

a socioemotional program for students and teachers. DLI6 supports the physical learning environment by leveraging school infrastructure assessment work conducted by USAID and funding interventions to rehabilitate schools and upgrade hygiene facilities. The DLIs associated with this RA are:

- (a) DLI4: Strengthened teacher preparation and management
- (b) DLI5: Improved learning environment in public schools and systemization of socioemotional data collection and reporting
- (c) DLI6: Improved physical environment

CHANGES UNDER RESULT AREA 3: REFORMED STUDENT ASSESSMENT AND CERTIFICATION SYSTEM

To strengthen support for the Government's efforts to improve student assessment, DLI7 will be expanded in scope and adjusted in terms of targets with a focus on providing a clear pathway for *tawjihi* exam reform. Under the original PforR, US\$28 million were allocated to DLI7 and the AF will provide an additional US\$13 million to incentivize the transition towards a competency-based, digital *tawjihi* exam as well as reducing the high-stakes nature of the exam. The definitions of existing DLRs from the original PforR will be updated to fully align with the Government's provisional national assessment strategy developed in 2019. In addition, new DLRs will be added to reward the achievement of key intermediate activities and outputs required for *tawjihi* exam reform. Building on lessons learned in the original PforR, the AF is introducing several DLRs to incentivize continuous stakeholder consultations and a participatory reform approach. The DLI associated with this RA is DLI7: Improved Student Assessment System - Reforming the content, delivery format and purpose of *tawjihi*.

CHANGES UNDER RESULT AREA 4: STRENGTHENED EDUCATION SYSTEM MANAGEMENT

In light of the experience with the COVID-19 pandemic, DLI8 was introduced to support MOE's education response during emergencies. The AF will incentivize the development of a blended learning strategy covering various modalities, including virtual and physical learning to ensure the digital gap does not further exacerbate the learning gap across socioeconomic levels and for Syrian refugees. The interventions are sequenced, starting with a curriculum mapping to identify opportunities for blended learning, and a pilot for blended learning content for primary grades 4-6 in the core subjects of Arabic, mathematics, English, and science.⁵ DLRs for content development and training of staff will incentivize the gradual integration of blended learning into teaching practices. Finally, in the final year of the AF, a DLR is introduced to incentivize an assessment of the impact of the DLI on learning, both by using data on usage of online material and an impact assessment of blended learning on learning outcomes.

The AF will continue to provide direct support to MOE by incentivizing additionality to its budget. DLR9.2 (formerly DLR8.2) specifying the budget additionality to MOE has disbursed twice and allowed upfront support to critical reform across the RAs; DLR 9.2c and 9.2d will be maintained from the original PforR, while DLRs 9.2e and 9.2f are added with a minor additionality to account for the added AF years, amounting to a total of US\$5 million. The DLIs associated with this RA are:

- (a) DLI8: Enhanced capacity of MOE to undertake education reform and respond to potential future school disruptions

⁵ Primary grades 4-6 were chosen to build on the ongoing USAID early grade reading and mathematics project (RAMP), which covers KG2-primary grade 3.

(b) DL19: Increased availability of resources and tools for the Program

2.1 Proposed Changes

The original PforR was valued at US\$700.0 million, representing 10 percent of the US\$7 billion ESP (Government program), and including key activities that focus on access for ECE and quality for ECE, basic, and secondary education. The proposed AF will operate within the original boundary of the Government program (see Figure 2). The PforR Program boundary will expand by US\$222 million in terms of the expenditure framework (see Table 1), of which \$100m is being provided through the AF (see Table 2). This expansion is reflected in (a) ambitious new targets, e.g. under RA1 due to universalization of KG2; (b) additional interventions across the board to respond to the COVID-19 pandemic, including ensuring sustainability of distance learning innovations that were introduced as a response to school closures; and (c) additional expenditures since the operation has been extended by 2 years. In addition, this AF includes restructuring of existing DLRs in order to provide a roadmap towards outcome achievement. Modified interventions include a more sequenced structuring of activities towards improving the learning environment and reforming the *tawjihi* exam, benefiting from the lessons learned in implementing the original PforR in terms of the need for a clear roadmap towards achievement of desired targets. Table 3 provides a high-level overview of the changes that are proposed, including dropped and modified DLIs, as well as a detailed overview at the DLR level.

Figure 2: Changes to Program Boundaries



Table 3 Program Boundaries and Expenditure Framework

Government program		Area	Original PforR (US\$ million)	AF (US\$ million)
		RA1: ECE access & quality	114	49.8
		RA2: Teaching & learning conditions	113	113.4
		RA 3: Student assessment	98	51.7
		RA 4: System Strengthening	375	7.1
Total	US\$7 billion		700	222

Table 4: Program Boundaries and Financing

Financing Source	Original PforR (US\$ million)	AF (US\$ million)	Total (US\$ million)
BORROWER/RECIPIENT	500	122	622
IBRD/GCFF	200	100	300
OTHER	0	0	0
TOTAL	700	222	922

A summary of the program changes is presented in Table 3 while a detailed description is available in the Program Paper⁶.

⁶ PROGRAM PAPER ON A PROPOSED ADDITIONAL LOAN TO THE HASHEMITE KINGDOM OF JORDAN FOR AN ADDITIONAL FINANCING - JORDAN EDUCATION REFORM SUPPORT PROGRAM-FOR-RESULTS, International Bank of Reconstruction and Development [May 2020]

Table 5: Summary of Proposed High-level Changes to DLIs and DLRs

Disbursement-Linked Indicator (DLI)	Allocation under original PforR (US\$ in millions)	Allocation after AF/Restructuring (US\$ in millions)	Key changes introduced under AF/Restructuring
DLI#1: Number of Syrian refugee children enrolled in target schools at the KG2, basic and secondary education levels	20	25	<ul style="list-style-type: none"> • Allocation: +5 • Targeted number of additional Syrian refugee children enrolled in school increased from 35,000 to 55,000
DLI#2: Expansion of KG2 services	15	51	<ul style="list-style-type: none"> • Allocation: +36 • Targeted number of additional children enrolled in KG2 increased from 30,000 to 50,000 • Introduced detailed sequencing of activities to support sustainable expansion of the KG2 sector and prevent overcrowding of classrooms
DLI#3: Improved quality assurance system for KG2 services	27	22	<ul style="list-style-type: none"> • Allocation: -5 • Dropped DLR on in-service KG teacher training to avoid duplication of work led by other donors • Added TA activities to support achievement of this DLI
DLI#4: Strengthened teacher preparation and management	34	35	<ul style="list-style-type: none"> • Allocation: +1 • Targeted number of teachers evaluated against NTPS increased from 5,000 to 6,400 • Revised DLR to be more outcome-focused by disbursing against evaluated teachers that meet minimum standards in instructional practices
DLI#5: Improved learning environment in public schools and systemization of socioemotional data collection and reporting	8	18	<ul style="list-style-type: none"> • Allocation: + 10 • Introduced new activity focused on collection and reporting of data on student & teacher well-being to inform future interventions to improve the school climate, which was identified as a key challenge in latest PISA results
DLI#6: Improved physical environment in Jordanian public schools	12	23	<ul style="list-style-type: none"> • Allocation: +11 • Introduced new activities (upgrading of WASH and school infrastructure) in response to COVID-19 • Dropped DLRs on school maintenance system to avoid duplication of work led by other donors
DLI#7: Improved student assessment system	28	41	<ul style="list-style-type: none"> • Allocation: +13 • Introduced new activities in response to MOE's plan to move towards a digitized, competency-based <i>tawjihi</i> exam • Introduced sequenced DLRs and new TA activities to support MOE's ambitious reform effort to separate the secondary school graduation function of the <i>tawjihi</i> from its function to determine admission to higher education
DLI#8: Enhanced capacity of MOE to respond to potential future school disruptions	0	19	<ul style="list-style-type: none"> • New DLI introduced in response to COVID-19
DLI#9: Increased availability of resources and tools for the Program	48	58	<ul style="list-style-type: none"> • Allocation: +10 • Increased allocation to incentivize budget additionality

3. Impacts, Risks and Benefits of the Additional Financing

The following section highlights impacts, risks and benefits of the new activities under the additional financing, as well as providing an update on performance of the parent program and any risks that have changed in the parent program.

The risks, impacts, activities and benefits of the parent program as outlined in the parent ESSA are all still relevant to the parent and Additional Financing (AF). The PDO and program boundaries remain unchanged. The program continues to expand access to early childhood education, and to improve student assessment and teaching and learning conditions for Jordanian children and Syrian refugee children. The AF does not introduce any new significant adverse environmental and social impacts.

Broadly, the program is expected to provide a number of social benefits from improved access and quality of education for Jordanian and Syrian children, supported by improvements in assessment and school climate; as well as improvements in training for teachers and school maintenance.

Physical works, and associated environment, health and safety and land-risks under the program are still mainly linked to Result Area 1. The program supports classroom expansions indirectly, through increased enrollment of Syrian children (DLI1) and *directly* through refurbishment and extension of KG2 classrooms on existing school lands (DLI2). DLI2 has been scaled-up under the AF. Minor health and safety upgrades (e.g. improved ventilation) *within school buildings* to adapt to COVID -19 contagion risks are linked to DLI6 under the AF. It's important to note that the parent ESSA captured *new* school constructions erroneously in the scope. New school construction for basic and secondary levels was excluded from the program (see Figure 1 from original Program Paper. This addendum will therefore focus on the risks and impact of school expansions and classroom refurbishments consistent with the program boundaries.

All of the risks and impacts are further assessed in this section, noting that potential negative environmental and social risks of the program are mainly related to Results Area 1, linked to the environmental and health and safety risks, and land-related risks, of constructing infrastructure to support the increased enrollment of students. Note that the parent program is still in early stages of implementation and has not disbursed yet under Result Area 1.

Figure 1: Boundaries of PforR Program

HRDS Themes/ Levels	ECE		Basic Education				TVET	HE
	Access	RA 1: Expansion in enrollment (DL1): <ul style="list-style-type: none"> Increase access to KGs in the private sector Appointment of new teachers Construction of KG2 classrooms 		<ul style="list-style-type: none"> Increase the enrollment rate of students with disabilities Establish new schools for Jordanian and refugee students Provide opportunities in informal education for illiterate adults 				
Quality	RA 1: Quality Assessment systems for ECE: <ul style="list-style-type: none"> Comprehensive quality assurance system developed for KG 2 KGs assessed using the new quality assurance system KGs develop quality improvement plans 		RA 2: Teachers <ul style="list-style-type: none"> Strengthened Teacher recruitment Professional Development/Licensing and Certification Teacher Management EMIS and GIS mapping 	RA 2: School Leadership & Community Participation <ul style="list-style-type: none"> School leaders training program 	RA 2: Safe & Motivating School Environment <ul style="list-style-type: none"> Pilot for improving pro-social behavior focusing on schools with high proportion of Syrian refugees 	RA 3: Curriculum & Assessments <ul style="list-style-type: none"> National assessment strategy developed G4 test replaced by G3 test focused on early grade reading and math Tawjihi reform pilot and action plan for reform rollout 		
	<ul style="list-style-type: none"> Raise awareness of caregivers (UNICEF, Canada) Increase qualified teachers in state KGs (USAID) Develop a modern curriculum for ECD (UNICEF, Canada) 		Teachers <ul style="list-style-type: none"> Teacher Remuneration & Incentives: Feasibility study on career paths Providing a social welfare package 	School Leadership & Community Participation <ul style="list-style-type: none"> Improved community participation in schools 	Safe & Motivating School Environment <ul style="list-style-type: none"> School feeding program Remedial program Program for gifted students 	Curriculum & Assessments <ul style="list-style-type: none"> Continual review, amending and dissemination of curriculum Improved International test scores 		
Accountability	<ul style="list-style-type: none"> Adoption of a M&E system for KGs (UNESCO) 		<ul style="list-style-type: none"> Implement the EQAU plan Implement an accountability system at all administrative levels in the Ministry of Education 					
Innovation	<ul style="list-style-type: none"> Use of technology in KG programs 		<ul style="list-style-type: none"> Increase in percent of schools that are connected to internet Increase in percent of primary schools that have computer equipment 					

HRD STRATEGY
 GOVERNMENT PROGRAM – National Education

Table 6: PforR Program in relation to World Bank Core Environmental and Social Principles

DLI#	New Activity	CP1: Sustainability, Risk Avoidance, Minimization and Mitigation	CP2: Impacts on Natural habitats & Physical Cultural Heritage	CP3: Protect public and worker safety	CP4: Manage Land Acquisition to avoid and minimize displacement and restore livelihoods to affected people	CP5: Equitable Access to program benefits (Social Inclusion)	CP6: Avoid exacerbating social conflict
RESULT AREA 1: Expanded Access and Improved Quality							
DLI#1	No change. Increase enrollment rates of Syrian refugees	environmental impacts during construction of school expansions. .	NA	<p>During construction: Health and safety of workers and child and public safety in proximity to construction sites.</p> <p>During school operation: health and safety of children, teachers, and other school workers in a school setting</p>	Program excludes construction of new schools. Processes are in place to avoid and minimize impacts. Residual land risks are related to school expansions where acquisition of adjacent private parcels is needed; impacts on informal users that may be present within property boundaries; or weak processes governing Voluntary land donation or willing-buyer willing seller transactions. Risks are considered substantial pending results of Land Audit and implementation of SOP.	Program has positive impact of inclusion of Syrian refugees and will benefit other vulnerable groups.	Potential risks if resource distribution is not seen as equitable.
DLI#2	Increase KG2 Enrollment. New DLRs for refurbished/Constructed and PPP classrooms	environmental impacts during construction activities and school operation	NA	<p>During construction: Health and safety of workers and child and public safety in proximity to construction sites.</p> <p>During school operation: health and safety of children, teachers, and other school workers in a school setting</p>	Program is focused on refurbishments and extensions on existing lands. Residual land risks are related to impacts on informal users that may be present within property boundaries or weak processes governing voluntary Land Donations, , etc. Risks are considered substantial pending results of Land Acquisition and Displacement Audit and implementation of SOP	Potential risks of exclusion or discrimination of vulnerable groups from KG2 access.	Potential risks if resource distribution is not seen as equitable.
DLI3	Licensing of KG2 against Quality Assurance Standards Method of counting has been modified	NA	NA	Potential risks to child physical safety and health and well-being in a school setting to be addressed in	NA	Potential risks of discrimination or exclusion of children to be addressed in	NA

					Quality Assurance Standard.		Quality Assurance Standards.	
RESULT AREA 2: Teacher Development								
DLI4	Teacher certification against NPTS. Minor changes to DLRs under AF	NA	NA	NA	NA	NA	Positive impacts on learning environment for all children.	Changes in professional requirements for teachers need to be well consulted with all stakeholders. Good stakeholder engagement can help to resolve conflicting viewpoints and interests between stakeholders. .
DLI5	Implementation of Social-Emotional Learning. Targets increased	NA	NA	NA	NA	NA	Positive impacts, especially for vulnerable groups	NA
DLI6	Improvements in Physical Environment including maintenance system. AF for WASH facilities and H&S to cope with COVID-19	Positive impacts from improved maintenance practices Potential minor negative impacts due to the upgrading of WASH facilities	NA	Positive health and safety and hygiene impacts for children in a school setting	NA	NA	NA	NA
Result Area 3: Reformed Student Assessment and Certification								
DLI7	Reform of Tawjihi System. AF will support development of Action Plan including IT based system	Potential low risks from the generation of e-waste	NA	Potential low negative health impacts due to possible improper handling and disposal of e-waste	NA. Testing facilities will be within existing schools	NA	System design needs to incorporate inputs from vulnerable groups.	NA

DLI8		New DLI focused on blended learning in case of school disruption	NA	NA	Potential minor negative health impacts due to possible improper handling and disposal of e-waste	NA	Virtual learning provides increased access/positive impacts to some vulnerable groups, while may be limiting for others.	NA
Result Area 4: STRENGTHENED EDUCATION SYSTEM MANAGEMENT								
DLI9		Implementation support	NA	NA	NA	NA	NA	NA

3.1 Result Area 1: Expanded access and improved quality of early childhood education

3.1.1 Environmental aspects of school construction

The parent Program indirectly supported the construction of new classrooms and the management of associated risks and impacts were covered in the original ESSA. The AF will under DLI2 directly support classroom expansion in a similar manner through the refurbishment and repurposing of available spaces in existing public or private schools or construction of new classrooms/ child-friendly restrooms/ playgrounds extension on schools' available land. The associated impacts are expected to be low to moderate and may include air, water, solid and liquid waste pollution, as well as the impacts associated with use of energy, water, and building materials during construction. Impacts during school operations may also include impacts associated with the generation of solid and liquid waste, as well as energy and water uses. Core Principle #1 is therefore relevant.

The construction activities are unlikely to have impacts on natural habitats and physical resources, as the rehabilitation and new classroom constructions will be confined in existing schools and/ or school available land. There might be a very limited need to clear some trees or vegetation on the land, but the impact of this will be negligible as new trees and vegetation cover will be planted as part of the greening and landscape beautification at the schools premises. Hence, DLI2 is in line with Core Principle #2.

3.1.2 Worker and Public Safety in School Construction

The occupational health and safety risks and impacts to site workers, students, teachers, and local communities adjacent to the project site were described in the Parent ESSA. During construction, these include exposure to dust, noise, fumes, hazardous chemicals, traffic safety, and injuries/ potential fatalities due to accidents during construction activities among others.

Since the program is focused on school extensions on existing school properties, there are also safety risks for children from fall or injury on a work site, requiring high levels of supervision of contractors and good construction practices. Children may also be exposed to risks of verbal harassment or exploitation from proximity to work crews. The geographically dispersed nature of the works and low capacity of MOE to supervise construction (see Section 4) contributes to elevated risks of community health and safety associated with the program. Appropriate mitigation measures such as Codes of Conduct and improved MOE supervision regime against contractual requirements that are enforced, have been recommended (See Recommendations).

3.1.3 Land Acquisition

As noted above, the program supports school expansions indirectly, through increased enrollment of Syrian children (DLI1) and *directly* through refurbishment and extension of KG2 classrooms on existing *school lands* (DLI2). DLI2 has been scaled-up under the AF with the following targets: Refurbished KG2 classrooms: 200; Constructed KG2 classrooms: 280; PPP KG2 classrooms: 30.

The parent ESSA highlighted land acquisition risks as one of the key drivers of substantial social risks associated with the parent program. While it was envisaged that the Program would not include any Category-A type investments, the parent ESSA captured *new* school constructions erroneously in the scope. New school construction for basic and secondary levels is excluded from the program and therefore the land-related risks associated with the program are limited to school expansions.

MOE has confirmed that they use a number of other strategies to minimize any land acquisition, since land is expensive. Strategies include double shifting, increasing class size, and leasing existing buildings. Even when land is needed, the use of government land or swapping of land between ministries is a common practice such that land acquisition is a last resort. However, from time to time, expansions necessitate acquiring adjacent parcels of land. Information provided to the World Bank indicates that 35 schools underwent expansion in 2019, for which seven (7) required private land acquisition (data for 2018 and 2020 are unknown). All of these were reportedly completed on a willing-buyer willing-seller basis (i.e. sellers have the right to refuse, and another site can be found) and the MOE seeks confirmation that the land is unused, with no buildings, crops or trees.

Where school expansions take place entirely on public land, without the need for acquisition of private land, there may be rare cases of potential impact to informal land-users, and reportedly these impacts are avoided. . There are occasional cases of Voluntary Land Donation that follow customary and national processes. Land acquisition is therefore considered an on-going social risk of the program, although it may be less than what was originally assessed under the program.

To gain further understanding of MOE processes, , an audit has been recommended, in addition to improved documentation of screening protocols, procedures and records. . The TOR for the World Bank to hire a consultant to conduct the land acquisition audit) has been prepared and is attached in Annex 1. The audit could not proceed owing to COVID-19 closures of government offices to access file as well as restrictions on site visits. Based on the findings and recommendations of the audit, the MOE will prepare and implement a corrective action plan and develop a Standard Operating Procedure (SOP) for land acquisition and related impacts. These requirements are included in the Program Action Plan.

Pending completion of the land audit to further quantify the risks, and adoption of Standard Operating Procedures, the risk is maintained as Substantial.

Updates on MOE systems and capacity to manage land-related impacts acquisition are provided in Section 4. The AF does not introduce any other activities or risks related to land acquisition.

3.1.4 Social Inclusion (Equitable Access for vulnerable groups)

The parent ESSA addresses the relevant risks of exclusion and equitable access for the program benefits related to Result Area 1 (DLI1 and 2).

In Jordan, the rate of Out of School Children (OOSC) is relatively low when compared to the Arab region and to the world. Some of the most common profiles of out-of-school children – who comprise many vulnerable groups in Jordan, in addition to the refugees (children who start and drop out or children who never enroll) are:

- **Children from poor socio-economic backgrounds:** Poverty is a significant economic factor that pushes children out of school. Direct and indirect costs of education, including the payment of school fees are the most common reasons for non-enrolment and non-attendance in pre-primary and primary schools. As such, access to ECED in Jordan is highly inequitable.
- **Child laborers:** Child labor is considered the main reason for school dropout particularly for boys, followed by bad treatment from teacher, illiteracy and low interest in school.
- **Children with disabilities:** Disability remains a major barrier for school enrolment and participation. Accessibility, poorly trained teachers and poorly adapted curricula for the disabled (only take into consideration physical disabilities, not the intellectual disabilities), are further exacerbated by the stigma and negative perception of children with disabilities by students, teachers and parents, often causing parents of children with disabilities to be hesitant about enrolling them in school.
- **Gender inequality and early child marriage:** Parity in enrollment has been achieved but gender issues within teaching methods, curricula, school environment and overall education system management are yet to be tackled effectively. Early child marriage, a negative coping mechanism of poverty, is one of the most extreme barriers for girls to stay in school currently estimated at around 13% in Jordan (girls married before the age of 18). It is quite prevalent amongst Syrian refugee communities. Similarly boys also face social and economic pressures to drop out of school and start working. The parent ESSA included a Gender Assessment that further elaborates on gender issues in Education.
- **Refugee children and children of migrant workers with illegal status:** Displaced children, particularly Syrian refugee children are more likely to be socially excluded than the host population and face multiple barriers that include high costs of schooling, insecurity (bullying, harassment), and until recently, bureaucratic procedures and lack of legal paper for school registration. Refugees are more likely to have been forced to discontinue education, have reduced access to services, and to have more free time.

As highlighted in the parent ESSA, the Government of Jordan has put enormous effort in supporting Syrian refugee children access education. However, accessibility challenges remain. Despite the ability to enroll free of charge in Jordanian public schools, out of the roughly 236,000 Syrian refugees between 5 and 17 years old in Jordan, only roughly 152,000 (64 percent) are in formal or non-formal education.^[1] Enrolment rates are especially low in early childhood education, but they do not reach beyond 70 percent for ages 7-10 years, when they begin to drop off again (and at a slightly faster rate for boys than girls). The program aims to promote inclusion of Syrian refugees and lower the rate of drop out of Syrians against a baseline (Syrian 2016/17 drop-out rate = 21%; Syrian 2017/18 drop-out rate= 19%).

Result Area 1 is designed to address increased access and quality and thus is targeting underlying constraints such as the availability and condition of education infrastructure, the strains from the influx of Syrian refugees, and other factors that have led to overcrowding in many public schools and use of second shifts, affecting the quality of learning for all children.

3.1.5 Child Safety in the School Environment

In order to support the government's program of universal KG2, the PforR program will support refurbishments and extensions and licensing of new public and private KG2 classrooms. The physical safety of children in these newly licensed facilities needs to be considered.

Environmental health and safety risks associated with the school physical environment of early childhood education may potentially include safety hazards (e.g. unfenced school premise/playgrounds, unprotected electrical sockets/connections, fire, unsecured windows, unsafe stairs); potential environmental exposures to air, water, drinking water, soil pollution/contamination in playground areas; noise pollution, inadequate sanitary facilities, solid waste collection and pedestrian accidents. Adequate measures to ensure safe and healthy environment include adequate indoor ventilation and lighting, soft playground surfacing to cushion falls, installation of fire alarms and fire extinguishers, emergency evacuation plans, safe engineering design for emergency exits and exterior stairways, adequate child-friendly warning signage, appropriate height and safety locks of classrooms windows, first aid kits, safe drinking water, washrooms with adequate quantities of water and soap, dustbins, and playgrounds safe fencing. Safe school accessibility means for kids with limited physical mobility including ramps, rails, adequate classroom spaces are also necessary and should be considered. These above requirements among others should be implemented and aligned with the MOE school design pertinent specifications. The MOE has also to consult with other international donors (e.g USAID, KfW, GIZ) on their requirements and adopt what works for Jordan. The above

^[1] Source: No Lost Generation Partners. *Investing in the Future: Protection and Learning for all Syrian Children and Youth*. March 2019.

requirements should also be incorporated in the QA system developed for the purpose of licensing KG2 classrooms under the program.

In addition to ensuring that the newly licensed KG2 classrooms under DLI2 meet the development needs of children, social risks for children include (i) potential for discrimination on the basis of race, sex, religion, language, color, origin or disability (ii) equal access for vulnerable groups such as physically disabled children (ii) potential exposure of children to violence or abuse (iv) health and safety of children including food safety and hygiene, and exposure to communicable diseases.

The above safeguard risks will be addressed through development of a quality assurance standard under the program that reflects the Jordanian context and international standards and is a requirement for licensing of KG2 classrooms under the program. The QAS should cover topics, including but not limited to:

- Receiving children without distinction as to race, sex, religion, language, color, origin or disability
- Equal access and accommodation for children with disabilities and appropriate qualifications of teachers in Special Education.
- Background checks for teachers
- Prohibition of child's physical punishment or shaking, or abuse of a child morally or verbally or in any form
- Appropriate conduct and behavior and prohibitions against any form of sexual abuse or exploitation of children
- General requirements to protect health and safety of children, and report accidents
- Food safety and hygiene, sanitation and protection against communicable disease
- Access to accredited medical care
- Appropriate child /staff ratios
- Provide for basic needs of food, clothing, drink, personal care, rest areas
- Facilities to meet Jordanian public safety requirements and Jordanian National Building Code, further specifications on emergency exits, water availability, safe play areas

3.1.6 Social Conflict

As described in detail in the parent ESSA, the program is being implemented near an area of recognized fragility and directly in areas that are host to a significant refugee population.

In relation to the potential of the program to exacerbate social tensions, the initial ESSA highlighted existing social tensions between Syrian refugee and Jordanian students, mainly manifesting itself as Syrian refugee children being bullied and not feeling a sense of belonging. The program duly incorporates interventions to address these tensions through initiatives in schools focusing on anti-bullying, Social-emotional learning, and a positive learning environment under Result Area 2 (See Section 3.2.2).

The parent ESSA also notes perceptions of decisions on resource distribution as a source of social tension. Specifically, the ESSA noted that local community members, parents, and school staff have at times contested the selection of school locations, believing them to be the result of “pressure imposed by influential people who cause irrational/unjust distribution”. The program supports expanded KG2 classrooms based on objective criteria such as an infrastructure assessment conducted by a qualified engineering firm.

There could be similar risk of contestation and social conflict related to the program’s component on investments in school physical infrastructure designed to align with pedagogical practices and learning needs of students (i.e., to create an appealing and welcoming climate). Decisions on which schools will receive a “mini-library, playgrounds, etc.” and WASH stations need to be based on transparent data and needs assessment criteria in order to avoid perceptions of favoritism or prioritization of refugee populations.

The AF introduces nothing else that could be envisioned to aggravate social tensions.

3.2 Result Area 2: Improved Teaching and Learning Conditions

3.2.1 Physical Environment: Health and Safety of the schools in operation

DLI6 under Result Area 2 aims to further improve the physical environment in Jordanian public schools targeted under the original Program by supporting additional funding for good health and hygiene practices brought about by the COVID-19 outbreak. This will be achieved through the provision of adequate hygiene facilities and encouraging regular hand washing to help reduce the spread of infections among students. These practices will also include the provision of adequate dustbins and regular refuse collection and disposal, regular maintenance of toilets, and sewage disposal systems to help maintain a healthy school environment and student's wellbeing. Therefore, adequate operation budget should be allocated by schools to ensure proper and regular supply of soap, toilet and hand papers, water, collection and disposal of solid waste, and regular cleaning and maintenance (including preventative maintenance) of the hygiene facilities. The upgrading of the WASH facilities and the basic rehabilitation of school buildings to meet MOE minimum health and safety requirements (installation of heating/ cooling systems, electric maintenance, paint) may also result in small impacts but it would be limited, temporary and easy to mitigate.

3.2.2 Learning Environment: Social-Emotional Development and violence in schools

Result Area 2 is expected to have positive social benefits that contribute to a response towards inadequate levels of socioemotional development in Jordan, as well as the issue of violence in schools from bullying.

The parent ESSA outlines the risks of violence related to the learning environment in the education system. The prevalence of violence in schools affects school attendance, with different consequences for boys and girls. Violence against children can take various forms including violence of teachers to students, violence between students (bullying), domestic violence, emotional/psychological violence. While corporal punishment in schools and other academic settings is illegal under Jordanian law, children continue to be subjected to physical and verbal violence. Risks related to harassment or sexual exploitation and abuse in a school setting is also a risk, but may be considerably mitigated for girls, owing to the highly gender-segregated environments after grade 3, and all teachers of mixed classrooms and girls-only classrooms are female. Harassment on transportation routes to and from school is noted as an issue in the parent ESSA. The MOE's *Protection and Safe Environment Hotline* for reporting any complaints related to gender-based violence, is further elaborated in Section 4.

As part of the AF, the allocation to DLI4 is dedicated to strengthening teacher preparation and management. DLI 5 will work towards creating a more comprehensive response program to school-based violence, bullying, and other behavioral challenges. This will be achieved by establishing a positive school-wide social culture that is monitored and tracked so that adjustments can be made throughout the school year, and by upgrading school facilities to create a functional and inviting learning space. The AF will furthermore support the scale-up of the "Qudra" Behavioral Curriculum. Qudra, first designed as part of the original P4R, is a 10-week-long behavioral curriculum for 7th grade students that addresses emotion regulation, self-management, self-efficacy and growth mindset. School climate interventions under DLI5 should ensure that they incorporate gender considerations to tailor programs for girls and boys.

3.3 Result Area 3: Reformed Student Assessment and Certification System

3.3.1 Environmental aspects

Result area 3 will support interventions on Student Assessment (DLI7) towards transitioning for digital competency based Towjihi exam. This will entail the design of a digital platform for test administration, grading, and reporting of the exam, test banks, and test labs. To equip schools and enable this digitization, existing computer labs at the schools (about 1300 lab) will be used as test labs and will be equipped with IT devices, equipment, and internet networks. It is estimated that a total of 20,000 PC, will be procured and dispatched to schools to supplement existing PCs (25,000). It will also provide other hardware equipment including 1,300 laser printers, 1,300 local exam servers, 100 UPS, and few monitoring cameras and monitors, and routers. These types of equipment will potentially result in electronic waste (e-waste) due to the replacement of old equipment with new ones and/or the disposal of the new equipment at the end of life cycle. This would require environmentally safe handling and disposal of the above e-waste to mitigate/ avoid associated environmental and health risks attributed to the potential impacts of e-waste (toxic chemicals/ pollutants on soil, water, food and air), if not properly handled, managed and disposed. In addition to e-waste, the installation of fiber

optics and electrical cables, electrical connections in the labs among other minor works, may also result in some solid waste which would need to be managed and disposed.

On the health and safety aspects, the improper handling and disposal of e-waste are associated with adverse risks on human health and safety. Health risks may result from direct contact with harmful materials contained in the e-waste (such as lead, cadmium, chromium, brominated flame retardants, or polychlorinated biphenyls (PCBs)), and direct inhalation of toxic fumes during the burning of e-waste to extract valuable materials (such as copper, silver, gold, palladium, iridium). Furthermore, recycling activities such as the dismantling of electrical equipment may potentially bear the risk of injury. Informal and untrained groups that collect and recover materials from e-waste could also be at risk to themselves and adjacent communities. Children and pregnant women are particularly vulnerable to risks of improper e-waste management.

DLI8 under Result area 3 supports the development of distance e-learning system that can substitute classrooms learning during times of crises and provide students with complementary learning resources. DLI8 includes developing blended learning content (classroom and e-learning) and instructions for teachers and students as well as embedded tools for student's assessment for grades 4-6 of primary education. The delivery of e-learning may require limited use of IT equipment in classrooms hence may potentially result in very low to negligible e-waste. For the IT use outside the classroom, please refer to the e-waste environmental and health risks and impacts described earlier in Section 3.3.1.

3.3.2 Social Aspects

Result area 3 will support interventions on Student Assessment (DLI7) towards transitioning for digital, competency- based Tawjihi exam. The social risks of the current Tawjihi exam are addressed in the parent ESSA. The new AF interventions under DLI7 and DLI8 are designed to expand and are expected to have positive social benefits by extending accessibility of education through distance e-learning. The Tawjihi exam will be accessible through existing schools thus students will not have to have their own IT systems to access the exam.

Tawjihi reform is an area that affects many Jordanians and is high stakes as it is linked to future education and job opportunities, and maybe controversial. The design of a new system requires a dedicated, comprehensive stakeholder engagement plan, with adequate consultation on gender considerations and challenges of other vulnerable groups. The stakeholder engagement plan is a requirement under DLI7.

3.4 Results Area 4: Strengthening Education System Management

Result Area 4 provides implementation support to the implementing agency. There are no negative social impacts anticipated. A number of mitigation measures for other result areas are included under result area 4 (see Recommendations).

4. Environmental and Social Management Systems

This section will cover any updates or changes in the Borrower's environmental and social management systems, regulatory regimes, capacity to manage risks and impacts resulting from the program, as well as performance of the systems to date. Systems associated with new activities under the AF will also be highlighted.

There have been no major changes to the regulatory frameworks governing environmental and social risks and impacts associated with the program since the parent ESSA was issued. Below are some recent developments and a baseline description of the regulatory framework associated with new activities and DLIs under the program.

4.1 Policy and Legal Framework

4.1.1 Environmental aspects of school construction

The pertinent environmental laws and regulations that apply to construction activities were described in the ESSA for the parent Program. These included the requirements of the Environmental Protection Law 52/2006 and the related instructions of site selection, environmental monitoring and site inspection regulations, air quality and noise standards, wastewater, solid and hazardous waste guidelines.

In 2017, Law 52/2006 was updated, and a new Environmental Protection Law of 6/2017 was endorsed. The new law covers the same issues included in the previous law and provided some more details in some articles such as Article 5 on the protection of Biodiversity areas, Article 12 on the EIA system classification of projects), and Articles 17-27 on penalties for non-compliance and violation. Furthermore, the 2006 instructions on site selection have also been changed. New instructions were issued in 2018 identifying certain setback distances for new projects from different receptors (e.g. residential areas).

In 2020, a new legal framework for the management of waste was issued (Law 16 of 2020). The law consists of 32 Articles that define waste and waste type, waste management, responsibilities, and violation and non-compliance penalties. One of the waste types listed in Table (1) of the Law is construction and demolition waste. The law stipulates that mitigation should be put in place to reduce reuse, recycle, sorting, minimizing the waste hazardous characteristics and the safe disposal when minimization, recycling, reuse, treatment is not feasible.

Other pertinent regulations on construction activities are the Jordanian National Construction Law No. (7) for 1993. This law covers 32 codes that address different aspects of the construction sector in Jordan. These codes were described in the original ESSA and include among others, building materials and usage, fire protection and alarm systems, natural ventilation and sanitary requirements, drainage, and sewerage refused disposal, public safety at a construction site, and accessibility of public buildings.

To ensure adherence to these codes, Jordan National Construction Law included in Articles (11) and (12), such mechanisms to follow up and ensure meeting the codes' rules and requirements by construction works. Article (13) of the same law contained deterrent penalties for violating these codes in construction works concerning the design, supervision, implementation, and maintenance of these works.

4.1.2 Environmental Aspects of E-Waste

There are currently no E-waste specific regulations in Jordan. It is only listed under the general category of hazardous substances and waste. Environmental Protection Law No. 6 of 2017, an updated version of Law No. 52/ 2006), is the overarching law that provides a general legal basis for the adoption of a wide range of subsidiary environmental legislation in the form of regulations and instructions. According to Article 7 of this Law, it is prohibited to bring in, or import any hazardous material to the country, or use or store or destroy or dump such waste in any way.

To back up the execution of the hazardous waste provisions of the Environmental Protection Law No. 6 of 2017, the Ministry of Environment established the Directorate of Hazard Substances and Waste Management. This Directorate is responsible for the preparation of national plans, policies and instructions for the management of hazardous waste and materials in the country. The Ministry has also established the National Technical Committee for Harmful and Hazardous Chemicals Management in accordance with the bylaw 24/2005. This committee comprised of 14 governmental, private, academic and governmental institutions and is mandated with formulating instructions that identify the conditions, means and scientific methods of disposing of hazardous and harmful materials in addition to identifying the suitable sites for disposal and treatment.

A draft policy on Management of Waste Electrical and Electronic Equipment (WEEE), was prepared in 2014 by the Ministry of Environment. The policy outlines the national strategy for the reduction, recovery, treatment and safe disposal of electrical and electronic waste. This draft policy which is yet to be endorsed by the government aims to:

- (i) Prevent the discharge of household electronic waste in domestic sewage systems;
- (ii) Develop appropriate sorting, collection and recycling mechanisms;
- (iii) Provide guidance and reference on standards and specifications for electrical and electronic equipment which is imported into the country;
- (iv) Develop an environmentally sound system for e-waste recycling and recovery from energy renewable sources; and
- (v) Facilitate the development of technical assistance and training for the management of electrical and electronic waste in the country remote areas.

The above draft policy recommended an increase in the Environment Ministry resources, putting in place of incentives to stimulate private businesses to invest in the collection, transportation, recycling, treatment, and final disposal of e-waste.

Jordan is also party to the Basel Convention on the “Control of Transboundary Movements of Hazardous Wastes and Their Disposal” and the Stockholm Convention on Persistent Organic Pollutants. The Basel Convention places obligations on countries that are Parties to the Convention, inter alia, to minimize the generation of hazardous waste, ensure that adequate disposal facilities are available, and ensure environmentally sound management of wastes. The releases of toxic chemicals due to unsafe disposal of e-waste are also covered under the Stockholm Convention and concerned parties are therefore obligated to take measures to avoid such releases through sound e-waste management practices.

4.1.3 Occupational Health and Safety

The Jordanian National Construction Law No. (7) for 1993 and associated codes cover some requirements on OHS. For example, Code no. 9 deals with scaffolds more than three meters high measured from the adjacent land. Code no. 15 on Fire Protection provides design and construction requirements for new buildings as well as modifications to existing buildings according to the type of occupancy. Also, Code no 22 on Public Safety at Construction Sites provides the requirements and arrangements for safeguarding workers, visitors, and those concerned with construction projects.

Chapter 9 of the “Labor Law No. (8) for 1996” includes general provisions on OHS issues at workplace. These provisions mainly regulate OHS related duties and responsibilities of both the employer and the employee at workplace. These provisions are not sector specific and do not explicitly refer to OHS at construction sites. Also, there are no specific regulations and standards governing OHS issues at construction sites in Jordan. As a result, the implementation of OHS requirements at construction projects in Jordan is weak, as reflected by the insufficient OHS details in procurement methods, poor inspection, passive contractor and worker attitudes, lack of awareness and training, among others. Therefore, the MoE should ensure that the tender documents and related contractual arrangements that include GIIP compatible OHS provisions. The PAP includes actions to strengthen MoE capacity on OHS related requirements through the preparation of Environmental, Health and Safety Guidelines. These guidelines would support the MoE in the preparation of their Standard Procurement Document (Employer’s Specification) to be applied to all civil works for refurbishment and extension of KG2 classrooms under the program.

Another pertinent law that applies to the AF intervention on health and hygiene is the Public Health Law 54/2000. This law states that any person infected with a contagious disease should be isolated to prevent a disease outbreak. It also gives a mandate to the Ministry of Health to monitor sewerage networks and internal installations and to ensure that public health is not jeopardized. Article 4 of the Law defines areas of work for the Ministry pertinent to public school management, including health promotion and healthy lifestyles, disease control, prevention of nutritional deficiencies, maternal and child health, school health, and prevention and control of communicable diseases.

As a consequence of the COVID-19 outbreak, the Ministry of Public Health and the Ministry of Labor issued related guidelines no. 11 and no. 12 to help manage and minimize potential related health

impacts on construction workers during the Pandemic. Contractors are to comply with these guidelines, and they are legally liable for any violation in these respects. The MOE also developed a protocol for school re-opening and a roadmap for safe return of employees to work.

4.1.4 Land Acquisition

Land Acquisition Law (LAL) 1987, Decree 12: Land acquisition is undertaken in accordance with Decree (12) of 1987 referred to as the Land Acquisition Law (LAL) and in accordance to its amendments. The LAL applies in all cases of land acquisition in the Kingdom of Jordan. There have been no significant changes to the regulatory framework governing land acquisition since 2017 and the description in the parent ESSA (paragraph 158-180) remains valid. Based on World Bank experience on other projects, and MOE procedures, the gaps between practices and the PforR Core Principle #4 are summarized below.

Table 7: Comparison between World Bank Core Principle 4 and Jordanian Laws

World Bank: Elements of Core Principle 4 (add reference)	Application of Jordanian Law
Avoid or minimize land acquisition and related adverse impacts.	The MOE Planning Department screens all taking of land and impacts are avoided, where possible. However, the screening processes for impacts on informal users is not formalized.
Identify and address economic or social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to resources they use or occupy.	The MOE Planning Department conducts site visits of all properties to be acquired or transferred. Their screening processes do consider impacts on various property regimes, such as common property resources, and those who lack title or any recognizable claim. Program processes do not require identification and mitigation of all significant impacts affecting informal users or occupiers of land (or other resources).
Provide compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid before taking land or restricting access	<p>In accordance with Jordanian Law, full replacement cost for land and assets is provided to title holders. Valuation is determined by Department of Land and Survey which regularly updates land valuations based on market data. DLS adopts the parcel-based system of registration and both the land register and the cadastral plans have been digitized; title deeds and plans are issued instantly by the DLS computer. However, there can be discrepancies between the cadastral plans, the land use categorizations, and the reality on the ground, which causes delays and potential errors.</p> <p>Crops and trees are compensated, and rates are established by a committee, but there are no guidelines defined.</p>

	Compensation to informal users is not required under Jordanian law. Transitional allowances are not required. Compensation may lag by several months after the land transaction is completed.
Provide supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment).	No specific provisions under Jordanian Law for loss of income.
Restore or replace public infrastructure and community services that may be adversely affected by the Program. Include measures in order for land acquisition and related activities to be planned and implemented with appropriate disclosure of information, consultation, and informed participation of those affected.	All assets on the property are subject to compensation. Consultation requirements are minimal – notice of expropriation is published in the newspaper. A clear process for land acquisition is defined in the law. MOE does additional in-person consultations with affected persons. Land-related grievances can be submitted to MOE GRM or Government of Jordan.

4.2 Borrower Environmental and Social Management Capacity

Borrower Performance and Track record: The Environmental and Social Performance of the program is rated Moderately Satisfactory primarily owing to delayed completion of Program Action Plan requirements to prepare and implement E&S Standard Operating Procedures, as well as the gender-related actions. Despite the unfulfilled requirements, the program continues to operate in conformance with national requirements and is pursuing many different gender initiatives.

Efforts to improve E&S performance that have been built into the AF are as follows: 1) the Program Action Plan requirements have now been realigned and refined to reduce overlap with other donors' programs and be more suited to MOE needs 2) the development of the SOPs will be supported with technical assistance 3) increase capacity building in areas such as health and safety and GRM are included in the Program Action Plan 4) E&S performance management requirements are build-in to DLRs and associated verification protocols.

It is also noted that USAID's Enhanced School Management Program is running concurrently with the PforR and is expected to significantly assist in improving the school planning and overall construction management functions, including environmental, health and safety and overall quality. Other international donors are active in school construction and together with NGO's are supporting MOE in areas of gender and school climate and many other areas.

4.2.1 Environmental Management of School Construction

The MOE has several completed/ ongoing school construction and expansion programs funded by international donors such as USAID, KfW, Kuwait, and Saudi Funds, GIZ, among others. Based on the new unified procurement system which merges and replaces the works and supplies systems into one new system, the MOE is responsible for the design and implementation of activities with budgets up to 500,000 JOD (approximately USD 700,000). The Ministry of Public Works and Housing (MPWH) is responsible for activities with higher budgets. The general safety requirements are included in the bidding documents and are binding to contractors. The Program will not cover new school constructions. It covers school expansion activities including the addition of new classrooms and facilities (playgrounds, library, toilets), and renovation of classrooms in existing schools which will be implemented by either the MOE or MPWH depending on the budget of these activities.

These constructions follow the MOE 2008 “Architectural and Engineering Guidelines for Government Schools”, or the donors’ guidelines if schools funded by donors (e.g. USAID). The MOE Guidelines comprise sets of technical specifications and national codes for school design and construction. Considerations for the environment, health and safety aspects in these guidelines are confined to the design and the construction technical aspects (e.g. requirements in the design of hygienic washroom, effluent/ sewage disposal, fire safety, chemical laboratories, universal accessibility for students with disabilities, etc.). In 2019, KfW made some revisions pertinent mainly to schools’/ classrooms’ special requirements. Considerations for the environment, occupational health, and safety aspects during construction are however not included in the MOE guidelines.

In 2015, the USAID prepared updated design guidelines based on the MOE 2008 Guidelines under the Schools for a Knowledge Economy Project (SKEP) to ensure higher quality, safety and access to public education and to achieve higher standards in school design and construction. These guidelines which apply to the schools that are financed by USAID, promote higher quality and low-maintenance materials, climate-responsive buildings and energy-efficient building envelopes. The guidelines also incorporate more stringent requirements for environment, health and safety aspects in the design and specifications for school construction (e.g. avoiding cutting healthy trees, low emitting materials, on-site wastewater treatment, lightning protection system, and fire alarm systems, among others). Although these updated guidelines do not include specific E&OHS guidelines for E&OHS for construction, USAID (and other donors) require that stringent E&OHS provisions and adequate supervision and reporting requirements be included in the works contracts.

In terms of supervision of construction activities, the MOE assigns an engineer from the ministry to supervise the contractors’ work. This supervision covers the quality and quantity of executed work and other EHS and OHS provisions included in the contracts. However, the EHS and OHS provisions of the MOE are often inadequate as manifested by the lack of workers’ PPE, poor housekeeping and lack

of site safety fencing (observed during the team site visit). These provisions should hence be enhanced. The MOE capacity is also constrained by the limited number of available engineers to undertake the supervision task, an issue that would warrant due attention. Furthermore, although the MOE has confirmed that there are no documented serious injuries or fatalities that have occurred on its worksites in 2018-2019, it is recommended that an improved reporting system on such accidents be designed and implemented.

To enhance the MOE capacity for the Environmental Performance of the Program and its additional financing, it would be necessary that the MOE prepare and implement Standard Operating Procedures (SOPs) that focus on OHS risks management. These SOPs should also include Guidelines and Standard Procurement Specifications to be applied to all civil works as well as guidelines and specifications to protect workers against COVID-19 risks. Preparation of the SOPs is a requirement of the Program Action Plan

4.2.2 E-Waste Management

Management of IT equipment is handled by the Queen Rania Al Abdullah Center for Information and Technology at the MOE. The center has a protocol in place for the management of old and unusable IT equipment. This protocol includes the identification (through technical inspection) and preparation of a register of all old unusable computers, printers, etc. available in different directorates. This equipment is then collected by Talal Abou-Ghazalah Global (TAG) Computer Refurbishment Center (CRC) for repair and reuse. The TAG CRC was launched as initiative by TAG chairman during his term as Chair of the United Nations Global Alliance for ICT and Development (GAID). In compliance with GAID requirements, TAG implements a business policy that aligns with the UN global environmental and social standards including the prevention and sound management of environmental and risks, banning forced and child labor, among others.

TAG-CRC is a nonprofit center with the mission to build knowledge communities by increasing the use of technology and enhancing computer literacy by setting up refurbishment centers across the region. Services of TAG-CRC include donation of refurbished PCs to underprivileged population in the Arab region, facilitating technical assistance, maintenance and overall computer support through the network of these centers. TAG-CRC has already refurbished and distributed over 1,500 computers to charities, camps and community centers. Any IT equipment which can't be refurbished, will be sent by CRC to the Ministry of Environment (MOENV) for disposal at designated disposal facility.

There is limited capacity for the collection and disposal of e-waste in Jordan. There is few e-waste drop off centers that are operated by municipalities (e.g. Yarouk waste transfer station in the Greater Amman Municipality). The Ministry of Environment operates a hazardous disposal facility in Swaqa site (located approximately 120 Km southeast of Amman) and has set up a center in this facility to oversee the safe disposal of electronic waste. Furthermore, the MOENV is making efforts to expand its capacity for the management of e-waste through several internationally funded initiatives and programs (e.g.

UNDP e-waste collection Program, improving the Swaga disposal site through PPP, and expanding the drop off collection centers). Related technical assistance in this respect is also provided by the Basel Convention Regional Center in Egypt.

4.2.3 Land Acquisition

The Land Acquisition Section under the MOE Planning Department is responsible for land acquisition processes to meet the needs of MOE for school construction in conformance with Jordanian Law.

The function of the department is as follows:

- Providing plots of lands for school buildings through land acquisition or re-assignment from the lands belonging to the Treasury or the Ministry of Agriculture (MoA)
- Preparing Annual Land Acquisition Plan following the requests from the Educations Directorates and according to the known procedures and mechanisms
- Development and updating of the data base related to vacant lands that are owned by the MOE
- Development and updating of the data base related to school buildings that are owned by the MOE

Notably, since the parent ESSA, the department has been restructured and the Land Acquisition Section has increased from one officer to three. For new schools or expansions, the MOE confirmed their approach to first identify lands already owned by the MOE, or to request transfer from other government departments, as private land acquisition is expensive. MOE also has a new school mapping unit that uses GIS system, connected to the Government Department of Lands and Survey (DLS) to identify available and suitable sites. The process of land acquisition by MOE is described in the following steps.

1. A committee is formed to study directorates' needs for school buildings
2. MOE searches for lands available and suitable for construction in line with its available financing resources.
3. First, MOE searches for lands owned directly by MOE or by the state treasury , then if those are not available, MOE searches for lands owned by other ministries, or by military, or by the Public Security Directorate for transferring ownership to MOE.
4. If public land is not available, then MOE announces in the newspapers on its intent to acquire a land for school construction meeting certain conditions and request applications. Certain conditions would include land specs, and avoidance of impacts to close neighboring properties.
5. A special committee consisting of the Administrative Ruler, the Ministry of Finance / Department of Lands and State Property and the Accounting Bureau negotiate the price with the Landowner. If they reach to an agreement, MOE goes ahead with acquisition procedures,

communications, and registration etc. For conducting land acquisition, the following stipulations are followed:

- Not to acquire a piece of land having constructed buildings or used for other purposes.
- Not acquiring lands with close neighboring to avoid extra financial compensation and expropriation complications
- If the land has greeneries and/or trees, those can be moved to another location or MOE can compensate the owner for those.
- MOE ensures that landowners get their financial compensation in a speedy manner and that land is not used before registration procedures are all completed, and owners receive their compensation.

4.2.4 Child Safety

Children safety at school is an important factor for adequate learning environment. The Program supports the provision of properly designed KG2 classrooms that include all necessary safety and protection amenities. The PAP TA will provide a detailed public-school inventory survey that will help identify schools with KG2 classrooms expansion potentials. This would enable the inclusion of needed safety requirements into the design of the classrooms to be added. Based on international standards, the MOE 2008 Architectural and Engineering Guidelines for Government Schools, and other donors related guidelines, these safety requirements should include class size (maximum of 25 students), cabinets, light fixtures, sinks, drinking fountains, rest rooms and windowsills, wheel chair ramp appropriately sized to fit KG2 students, among others. KG2 classrooms should also be arranged to accommodate ample space for the movement of the students and their supervising teacher. Furthermore, KG2 children drop-off area should be separated from the school's main drop-off area and pedestrian traffic.

Currently, the MOE's approach to quality assurance of KG2 comprises two systems: the Quality System for Public Kindergartens and the Kindergarten Accreditation System. First implemented in 2009, the Quality System for Public Kindergartens supports public kindergartens to provide quality services based on seven domains of ECE functioning. It includes a set of auditing tools, with administrative and technical checklists. The Kindergarten Accreditation System, on the other hand, was developed by the MOE in 2016 and offers accreditation to public and private KGs based on six domains—the majority of which overlap with the domains of the Quality System for Public Kindergartens. The accreditation system was developed to increase quality in both public and private facilities under an integrated institutional framework and to promote self-evaluation among kindergarten teachers and principals. In addition to these two systems, the MOE has been working in cooperation with the Queen Rania Award for Educational Excellence on the establishment of the distinguished kindergarten award, which aims to increase awareness about the importance of early education, to recognize pioneering and

exemplary efforts in public ECE, and to support the MOE in achieving its goals related to early education.

Under the PforR program, technical assistance is being provided to develop a unified quality assurance system for public, private, and non-governmental KG2 classrooms licensed under the program. The scope of work entails review of the current systems and practices in place to promote quality (i.e., the Quality System for Public Kindergartens, the Kindergarten Accreditation System, and the distinguished kindergarten award). The Quality Assurance Standard will be based on Jordanian requirements, and international reference standards including Measuring Early Learning Quality and Outcomes (MELQO)⁷. The QAS will address safeguard risks such as safety of physical environment; equitable access and child protection (See Section 3). Licensing of KG2 classrooms against the QA Standard will be done by the Inspections Department of Ministry of Education.

4.2.5 Gender

The Ministry of Education Gender Unit at the MOE consists of two staff, and one Director, and is supported by one international consultant (donor-funded). They are responsible for implementing the MOE's Gender Strategy and coordinating activities of the newly developed Gender Action Plan (December 2019) supported by several international donors including UNHCR, UN Women, Canada, USAID, and others. The MOE's Gender Action Plan is comprehensive, and aligned with the pillars of the ESP. It has Strategic Objectives including, among others, (i) ensuring equal access to quality ECED programmes for both boys and girls; (ii) ensuring (teacher) policies are gender sensitive; and (iii) ensuring safe, healthy and enabling learning environments for both boys and girls and reduce the risk of gender-based violence.

Other recent accomplishments achieved by the Gender Unit partially connected to the gender-related activities under the original Program Action Plan are listed as follows:

- Conducted a Gender Audit of MOE organization
- Conducted Training on Gender for most of the MOE staff and school administrators and principals (teachers are yet to be trained). They are working with USAID on a classroom guide for training teachers on gender.
- The National Teacher Standard has been reviewed by the Gender Team for explicit mention of gender concepts.
- With support on UN Women, they formed a team who will be trained in 2020 on how to incorporate gender into the curriculum

The commitments in the PforR PAP have now been aligned with the MOE's Gender Action Plan, and new completion measurements will need to be set.

⁷ Measuring Early Learning Quality and Outcomes (MELQO) by World Bank, Unesco, Unicef and Brookings Institute, 2017.

Original Action		Revised Action	
(i)	Enhancing the capacity of MOE staff and respective partners to mainstream gender in program activities	a)	Provide enhanced training programs and courses to field directorate staff on gender and equality concepts and mainstreaming gender and equality in their daily work. (PAP)
(ii)	Reducing gender biases and stereotypes in teacher training	b)	Integrate training on gender-responsive pedagogy in teacher training for both male and female teachers and teacher trainers of all specializations Includes guidelines for classroom management) (PAP).
(iii)	Developing gender-sensitive guidelines for classroom management		Included in b)
(iv)	Supporting teachers to provide a safe learning environment for girls and boys	c)	Ensure gender sensitive and responsive approach to the design of and piloting of a school program for improving school climate and student socioemotional learning, including considerations of gender-based violence (incorporated into TA for social emotional learning for DLI5)

5. Stakeholder Engagement

5.1 Stakeholder Engagement during ESSA Addendum preparation

The parent ESSA was extensively consulted in 2017 with a range of external and government stakeholders. The stakeholder events and records are provided in the parent ESSA.

The environmental and social risks and benefits of the additional financing have also been consulted with international development partners and UN agencies including UNICEF, Save the Children, and the Norwegian Refugee Council from December 2019 – February 2020. The program design and its strong focus on improving the learning environment in schools in general and particularly those with a large share of Syrian refugees, is reflective of the input from these consultations.

- Violence and bullying in schools lead to dropout and low attendance by Syrians and vulnerable in general
- Discrimination and humiliation are particularly important for Syrian children as deterrents to school attendance (although there are also other economic and social pressures)

- Programs that improve socioemotional well-being, including overcoming trauma, reducing nightmares, techniques to enhance focus in the classroom, are important for Syrians
- Training teachers, principals, school counselors to work with vulnerable students in general and Syrians in particular is important

Numerous departments within the Ministry of Education and conducted field visits to 3 schools during the weeks of February 6-14, 2020. The ESSA Addendum was consulted with Ministry of Education and Ministry of Planning and International Cooperation (MOPIC) on June 2, 2020 and will be further disclosed on the World Bank and MOPIC MOE website by appraisal. Hard copies will be made available at Field Directorate (FD) Offices.

The ESSA will be further consulted with other external stakeholders such as parents and communities during program implementation.

5.1 Stakeholder Engagement during program implementation

There are several stakeholder and citizen engagement mechanisms that will be carried out throughout program implementation. Primarily there is a Communications and Awareness Campaign (supported with technical assistance) that entails design, development, and roll-out of effective communication activities to a range of audiences on topics related to education turnout in Jordan. For example:

- a) Promote access to education and benefits of schooling for girls and boys; mainstream gender equality and environmental stewardship concepts;
- b) Influence the importance and vital role of parent-teacher association and education councils to maximize the parents involvement in the education program;
- c) expand awareness on inclusive education support services for KG2 to G12 and encourage participation;
- d) spread awareness about maintaining safe school's environment, and reinforce belonging and responsibility spirits for keeping cleanness, stopping vandalism and violence
- e) Raise awareness on the KG's accessibility in community vicinity and the importance of children's integration in the KGs' phases for improving learning attainment
- f) Promote all the Tawjihi and National Assessments reform and system strengthening
- g) Promote health and hygiene and requirements to prevent spread of COVID-19 contagion

The communications campaign will include a pre-campaign survey of relevant stakeholder groups.

As noted above, there is also a dedicated Stakeholder Engagement Plan related to the reform of the Tawjihi system.

Ministry of Education also has a number of regular channels for soliciting feedback from stakeholders such as parents, teachers, students and communities that will be used to consult on various aspects of the program and ESSA during implementation.

5.2 Grievance Redress Mechanism

As described in the parent ESSA, the MOE's Grievance Redress Mechanism continues to reside in the Internal Monitoring Unit, Complaints Division. This unit is comprised of the Administrative Monitoring Division and the Complaints Division. The GRM accepts complaints from the public, teachers and staff, and students. In addition, it receives complaints from the nation-wide GoJ "at your service" application and has a dedicated Officer for this purpose. Reportedly, many complaints are also resolved at school

level, via the principal, and/or referred to a Discipline committee before reaching the MOE. The MOE system, through the various uptake channels, logged 4211 complaints in 2019, of which 3514 are recorded as resolved.

The nature of complaints continues to primarily relate to teacher or student placement issues, although there are some complaints related to land acquisition, construction nuisances (e.g. dust and noise) and violence in schools. The latter are referred to the Protection and Safe Environment Section. There are also a significant number of malicious complaints. There are no classification or categorization about the types of complaints received. Informally, the Division tries to use their experience to make improvements in the system, but there is no systematic analysis of the grievance data to inform management.

The nature of complaints received by the Protection and Safe Environment Section primarily relates to discipline in the classroom, although may also include instances of sexual harassment and violence, bullying, or potential domestic child abuse. There are various uptake channels including an online form to submit a complaint, and they work through counsellors at schools. They are partnering with Government of Jordan Department of Family Services and UNICEF to produce Guidance Procedures with standardized referral pathways. Their main challenges relate to 1) lack of awareness of the hotline and restricted hours of operation (day-time only) 2) lack of counsellors at all schools 2) prevailing social norms (e.g. physical discipline) 3) lack of penalties for teachers for using violence 4) lack of control over temporary teachers 4) lack of training of officers in the Section on mediation and advisory skills.

The MOE is designing a new electronic complaint system that will be accessible through email, or app. The system is in final stage of preparation including the design of the screens and internal system. The system is designed to address key challenges such as 1) confidentiality 2) accessibility 3) Cost and time of verifying validity complaints i.e. eliminating malicious complaints) and resolving complaints. The system is supposed to be piloted this year and running in 2021.

Given the scope and functionality of the MOE's current GRM, as well as the breadth of the interventions under the PforR program, the MOE's GRM is considered appropriate for tracking any complaints regarding the PforR program, and there is no need to establish a separate program GRM. The Program Action Plan contains measures to strengthen the capacity of MOE GRM Systems, specifically the GRM design review and completion of the installation of the electronic complaint system and training for the GRM unit, supported by Technical Assistance. The number of complaints received and resolved within stipulated time frames is also a results indicator of the program.

6. Conclusions and Recommendations

The overall combined social and environmental risks of the program are currently considered substantial.

The social risks of the program are considered substantial: The social risks under the proposed additional financing will remain ‘Substantial’ primarily owing to land-related risks of the parent and additional financing. While the program excludes construction of new schools, Result Area 1 supports expanded enrollment of Syrian refugee children at all levels, and for all children in refurbished and extended KG2 classrooms, primarily on existing school lands. Land acquisition is minimized by constructing on existing MOE lands wherever possible, and the MOE also uses other strategies to increasing enrollment (e.g. increase class size), but school expansions in some cases entail swapping of land between ministries, or acquiring adjacent parcels from private land owners. There are also risks related to informal land users which are not recognized under Jordanian Land Law, even when constructing on MOE lands.

A land acquisition audit will be conducted by the World Bank by October 2020, and Standard Operating Procedures (SOP) will be prepared by MOE based on the audit recommendations by December 2020. The SOP will cover screening and implementation procedures for land acquisition and compensation in order to adhere to the PforR Core Principles.

The program also entails risks related to community health and safety. Positive impacts are expected from the AF interventions in support of MOE’s COVID-19 emergency response plan to install new hygiene facilities in schools, and provide virtual learning methods for remote learning. Health and safety risks might arise for children and public from hazards during construction of extensions and refurbishments, and proximity to work crews. Health and Safety requirements will be incorporated into standard procurement documents for civil works under the program and the capacity of the MOE on Health and Safety will be augmented.

The broader social risks associated with the Program as identified in the Environmental and Social Systems Assessment for the parent program, remain relevant for the AF. These risks are contextual in nature such as violence in schools (various forms), gender biases in school curriculum or teaching, inadequate support to children with disabilities and special needs, vulnerability and psychological distress among poor Jordanians and Syrian refugees leading to negative coping strategies such as child labor, early marriage, and begging which may contribute to children dropping out. The government's program for universal KG2 under the additional financing may decrease risks related to inclusion and access and may exacerbate others if classrooms are overcrowded or licensing processes for new KGs are weak. The program incorporates several preventative interventions, such as social-emotional learning, and quality assurance measures that have been assessed.

Environmental risks are considered Moderate. The environmental risks under the proposed additional financing remain ‘Moderate’ as rated in the original program since it supports similar physical activities (i.e. classroom expansion through refurbishment of available spaces in existing schools or construction of new classrooms/ child-friendly restrooms/ playgrounds extension on

schools' available land). These activities are expected to result in low to moderate impacts on air, water, and soil quality as well as on workers' and adjacent communities' health and safety (including students and teachers) during construction. During school operation, impacts could be related to water supply and sanitation, solid waste management and maintenance needs. The upgrading of the WASH facilities and the basic rehabilitation of school buildings (installation of heating/ cooling systems, electric maintenance, paint) may also result in similar type of impacts but it would be limited, temporary and easy to mitigate. The impacts of the potential resultant e-waste associated with the end of use disposal of IT equipment utilized by the project (e.g.: digitization of competency-based Towjihi exam and distant e-learning) would be low as the amount of generated e-waste would be insignificant compared with that generated in Jordan. Digitization will result in paperless exam and learning and thus reduces carbon footprint associated with paper production (cutting trees, use of chemicals, energy, etc.) and generation of waste.

Recommendations: The environmental and social risks of the program are considered to be adequately mitigated, through DLIs (Table 8) and associated verification protocols, committed actions in the Program Action Plan (Table 9), or through inputs to terms of reference in Technical Assistance. All of the following recommendations are the responsibility of MOE as the implementing agency and will be supervised throughout bank implementation:

Table 8: Recommended Actions through DLIs to Strengthen Environmental and Social Management Systems

RA/ DLI	Completion & Verification Measurement
RA1: Expanded access and improved quality of early childhood education	
The infrastructure Assessment of public schools identifying the construction/small works required to create additional KG2 classrooms and associated costs will include: a) the technical and financial feasibility of upgrades for disability access to these classrooms b) the land-related risks associated with the primary school where the classroom extension will occur, as determined by the application of the Standard Operating Procedure for Land Acquisition	DLR 2.3b-2.4b and related verification procedure
The Action Plan outlining the detailed implementation plan and timeline for the expansion of public KG2 services, will include corrective measures, consistent with Core Principle 4, to resolve land-related risks identified in the Infrastructure Assessment	DLR 2.3b-2.4b and related verification procedure
The Quality Assurance Standard applicable to all public and private licensed classrooms under the program that will include measures to protect child physical and emotional health and safety such as i) potential for discrimination on the basis of race, sex, religion, language, color, origin or disability (ii) equal access for vulnerable groups such as physically disabled children (ii) potential exposure of children to violence or abuse (iv) health and safety of children including food safety, sanitation and hygiene, and exposure to communicable diseases (v) structural requirements and specifications for fire, water, sanitation, safe play areas	DLR 3.4/inputs to TOR for TA
The technical design specifications of the PPP model will make reference to the QAS and any other applicable E&S requirements to be verified by the Program verification process	DLR 2.4c Verification Protocol
RA2: Reformed student assessment and certification system	
Ensure gender sensitive and responsive approach to the design of and piloting of a school program for improving school climate and student socioemotional learning, including considerations of gender-based violence	included in the Terms of Reference for Technical Assistance supporting DLI5
RA3: Reformed student assessment and certification system	
Design and implement a comprehensive Stakeholder Engagement Plan for the reform of the Tawjihi System	DLR 7.3-DLR7.4

Table 9: Recommended Items for the Program Action Plan to Strengthen Environmental and Social Management Systems (and Status of E&S Actions under the Parent Program Action Plan

No	Program Action Plan (Parent PforR)	Due Date	New/ Revised Action (AF)	New Date	Completion Measurement
1	Environmental and Social Standard Operating Procedures and Guidelines including different measures to bridge identified gaps adopted	March 2018	a) Prepare an Environmental, Health and Safety Guideline and Standard Procurement Document (Employer's Specification) to be applied to all civil works for refurbishment and extension of KG2 classrooms under the program. The specification will also cover measures to protect workers against COVID-19 risks and the public, especially children, including a Code of Conduct for workers. The Guideline will also include an awareness module for schools on safety such as fire, playgrounds, floods (Supported by TA).	December 2020	Environmental, Health and Safety Guideline is prepared and Employer's Specification that is incorporated into MOE Standard Procurement Documents.
			b) Prepare and Implement Corrective Action Plan based on the World Bank Land Acquisition and Economic and Physical Displacement Audit and Standard Operating Procedures for Land Acquisition and related processes.	December 2020	Corrective actions complete and SOP prepared.
2	Enhancing the capacity of MOE staff and	2019	Provide enhanced training programs and courses to field directorate staff on gender	December 2023	TBD

No	Program Action Plan (Parent PforR)	Due Date	New/ Revised Action (AF)	New Date	Completion Measurement
	respective partners to mainstream gender in program activities		and equality concepts and mainstreaming gender and equality in their daily work.		
3	Reducing gender biases and stereotypes in teacher training	December 2020	Integrate training on gender-responsive pedagogy in teacher training for both male and female teachers and teacher trainers of all specializations (Includes guidelines for classroom management).	December 2021	TBD
4	Developing gender-sensitive guidelines for classroom management		Included in 3.		NA
5	Supporting teachers to provide a safe learning environment for girls and boys	December 2020	Ensure gender sensitive and responsive approach to the design of and piloting of a school program for improving school climate and student socioemotional learning, including considerations of gender-based violence (supported by TA for Socio-emotional learning)	December 2021	TBD
6	NA	NA	(NEW) Ensure expertise is present in the appropriate departments through extensive training or recruitment to oversee occupational health and safety in construction and implement hygiene measures in schools to prevent COVID-19 contagion risks	March 2021	Position created and filled

No	Program Action Plan (Parent PforR)	Due Date	New/ Revised Action (AF)	New Date	Completion Measurement
6	NA	NA	(NEW) Deliver training to GRM unit on mediation skills (supported by TA)	March 2021	Training delivered
7	NA	NA	(NEW) complete design review and installation of electronic GRM platform (supported by TA)	December 2021	System is operational and logging complaints

Annex 1: Terms of Reference for Land Acquisition and Economic and Physical Displacement Audit.

World Bank Terms of Reference (ToRs)

For a Consultant Assignment to Conduct a Land Acquisition and Economic and Physical Displacement Audit for Jordan Ministry of Education

Background

a. Program Information

Currently, Government of Jordan Ministry of Education is financed by a World Bank (WB) PforR Program. The objective of the Program is to expand access to early childhood education, and to improve student assessment and teaching and learning conditions for Jordanian and Syrian refugee children through:

- Expanding access and improved quality of ECE;
- Improving teaching and learning conditions; and
- Strengthening student assessment system;

The Program is supporting a sub-portion of the government's National program (NESP) across four key Results Areas. These Results Areas fall under the access and quality themes for ECE and basic and secondary education. The PforR Program is valued at US\$700 million of the larger \$7 billion Government program and includes key activities of the NESP that focus on access for ECE and quality for both ECE and Basic Education. Figure 1 provides an overview of the boundaries of the government program and the PforR Program. As it relates to land acquisition, it is important to note that the program supports *expansions of KG2 classrooms*. Construction of new schools is outside the program boundary.

The Program became effective on December 14, 2017.

HRDS Themes/ Levels	ECE	Basic Education				TVET	HE
Access	RA 1: Expansion in enrollment (DLI1): <ul style="list-style-type: none"> Increase access to KGs in the private sector Appointment of new teachers Construction of KG2 classrooms 	<ul style="list-style-type: none"> Increase the enrollment rate of students with disabilities Establish new schools for Jordanian and refugee students Provide opportunities in informal education for illiterate adults 					
Quality	PforR Program RA 1: Quality Assessment systems for ECE: <ul style="list-style-type: none"> Comprehensive quality assurance system developed for KG 2 KGs assessed using the new quality assurance system KGs develop quality improvement plans 	RA 2: Teachers <ul style="list-style-type: none"> Strengthened Teacher recruitment Professional Development/Licensing and Certification Teacher Management EMIS and GIS mapping 	RA 2: School Leadership & Community Participation <ul style="list-style-type: none"> School leaders training program 	RA 2: Safe & Motivating School Environment <ul style="list-style-type: none"> Pilot for improving pro-social behavior focusing on schools with high proportion of Syrian refugees 	RA 3: Curriculum & Assessments <ul style="list-style-type: none"> National assessment strategy developed G4 test replaced by G3 test focused on early grade reading and math Tawjihi reform pilot and action plan for reform rollout 		
		Teachers <ul style="list-style-type: none"> Teacher Remuneration & Incentives: <ul style="list-style-type: none"> Feasibility study on career paths Providing a social welfare package 	School Leadership & Community Participation <ul style="list-style-type: none"> Improved community participation in schools 	Safe & Motivating School Environment <ul style="list-style-type: none"> School feeding program Remedial program Program for gifted students 	Curriculum & Assessments <ul style="list-style-type: none"> Continual review, amending and dissemination of curriculum Improved international test scores 		
Accountability	<ul style="list-style-type: none"> Adoption of a M&E system for KGs (UNESCO) 	<ul style="list-style-type: none"> Implement the EQAU plan Implement an accountability system at all administrative levels in the Ministry of Education 					
Innovation	<ul style="list-style-type: none"> Use of technology in KG programs 	<ul style="list-style-type: none"> Increase in percent of schools that are connected to internet Increase in percent of primary schools that have computer equipment 					

b. Environmental and Social Assessment

During Program Preparation, in accordance with World Bank OP 9.0 for Program for Results financing, the World Bank conducted its own assessment of the Ministry of Education’s environmental and social systems⁸. The purpose of the ESSA is to (i) assess the environmental and social risks and benefits associated with proposed activities required to achieve the Program Development Objective (PDO) and the Disbursement Linked Indicators (DLIs) (ii) assess the extent to which the borrower’s environmental and social management systems are consistent with the Bank’s core environmental and social principles spelled out in Bank policy and associated guidance materials (iii) evaluate the borrower’s performance and track record in implementing its environmental and social management systems; and (iv) provide a set of recommendations and actions which the borrower has agreed to undertake to improve the implementation of applicable systems.

⁸ World Bank Program-for-Results, Jordan Education reform support program, [ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT \(ESSA\)](#)

The assessment highlighted land acquisition risks as one of the key social risks associated with the program. While it was envisaged that the Program would not include any Category-A type investments, and while the use of government land or swapping of land between ministries is a common practice to minimize involuntary land acquisition, it is necessary to acquire some land for *school expansions* under the Program under Results Area 1. In addition, construction of school expansions even on public land, may also cause adverse impacts on informal land-users, unless properly managed. The ESSA concluded that there were certain areas in Ministry of Education and national processes and capacity that needed to be strengthened (see ESSA for further detail on the analysis) in order to mitigate these risks. The Program Action Plan includes a requirement to develop standardized procedures, including capacity building, to make sure that adequate measures are taken to prevent negative impacts. Notwithstanding that the MOE is working extensively with other donors to enhance its planning functions including site selection processes, the World Bank is seeking to review and confirm land acquisition risks associated with the program to date, and develop procedures to be used for the program going forward.

World Bank PforR Programs must comply with the [Bank Policy for Program for Results Financing](#)⁹, which includes a set of (8) core environmental and social principles. Core Principle #4, pertains to managing land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards. The Bank Directive¹⁰ further elaborates on the assessment against this principle as follows:

- (i) avoid or minimize land acquisition and related adverse impacts;
- (ii) identify and address economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people lacking full legal rights to resources they use or occupy;
- (iii) provide compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid before taking land or restricting access;
- (iv) provide supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment);
- (v) restore or replace public infrastructure and community services that may be adversely affected by the PforR Program and include measures in order for land acquisition and related activities to be planned and implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.

⁹ [Bank Policy Program for Results Financing, November 10, 2017](#)

¹⁰ [Bank Directive](#), Program for Results Financing, June 20, 2019

Objective of the Consultancy

The World Bank is seeking a consultancy service with the following objective:

- 1) Conduct a review of all *school expansions* to assess the manner in which land acquisition was carried out.
- 2) Where there are gaps with the World Bank's PforR Core Environmental and Social Principle #4 identified, propose a corrective action plan that will bring land related processes into line with the requirements
- 3) Prepare Standard Operating Procedure (SOP) for land acquisition processes to be applied by the Ministry going forward for all school expansions under the program (although it should be designed to be applied beyond the boundaries of the program).

The resulting report should be submitted to and validated by Ministry of Education and the World Bank.

Scope of Work

The consultant will assess land acquisition impacts and processes for *all school expansions* constructed under the program. For the purposes of the assessment, a school expansion is defined as any construction of a school building, or facilities, that contributes to expanded enrollment of Kindergarten (KG2) students. This expansion may be within the boundaries of an existing school property, or on adjacent land. Preliminary information provided to the World Bank indicates that 35 schools underwent expansion in 2019, for which seven (7) required private land acquisition (data for 2018 and 2020 are unknown).

The reference standard for the audit are the PforR Core Principle #4 and associated guiding materials provided in Annex 1. The assessment shall also be informed by good international practice (e.g. World Bank Operational Policy 4.12).

Task 1: Determining extent and status of the land acquisition under the Program

Collect data to determine and assess the following:

1. Nature of school expansion (what type, size, footprint)
2. Ownership status of land on which expansion was built, and land-use prior to construction of expansion
3. Type and magnitude of impact for each plot e.g. loss of land, loss of other assets, loss of crops and trees, economic or physical displacement, loss of access to natural resources, value of land and assets lost, value of expected compensation or payment

4. Obtain information on number, types and names of private landowner/tenants including, on a best-efforts basis, any affected informal land-users and/or forced evictions.
 - Determine whether the land was purchased under a negotiated agreement, or expropriated (in case owner does not want to sell). For negotiated settlements, assess whether the process was transparent and free of intimidation.
 - Determine status of payment or compensation for each landowner/tenant/user and the timing of the payment vis-à-vis the start of works. If there is delay related to payment, assessment of reasons of these delays. This should both be in general (e.g., institutional issues) as well as for each landowner/tenant/user (e.g., lack of legal titles, delays in identifying owners, opposition of the owner for the land acquisition resulting in expropriation process, owner fully notified (due diligence) and amount held in escrow for him or her to access without any conditions)
 - On a best efforts basis, describe the socioeconomic level of the affected households. The emphasis will be on identifying potential vulnerability factors among the affected households (for example, related to the economic, social, educational or political status of the affected population and their age, gender or health status)

Task 2: Assess adequacy of the land acquisition process in relation to World Bank requirements

- Review of existing land acquisition systems and mechanisms at the Ministry of Education (MOE) including: existing internal processes and procedures, institutional arrangements related to land acquisition, land availability issues, environmental and social aspects, Grievance Redress Mechanisms (GRM), etc.;
- Using the ESSA as a basis, provide any updates of the applicable legal framework and procedures in comparison to World Bank requirements. The consultant should use available information from the Ministry of Education Land Department and Department of Land and Survey procedural documents to summarize the key gaps, where these are relevant to the past land acquisition.
- Land and asset valuation method used for land acquisition (e.g., market value, replacement value, estimation of lost crops or income, National standards for valuation). Reference will be made for valuation methods used under the current national procedure.
- Types and amount of monetary and non-monetary compensation measures for each landowner/tenant/user. In the case of monetary or land-for-land compensation it must meet the criteria of replacement value. Reference will be made for valuation methods used under the current national procedure.
- Determine whether there are any grievances related to land acquisition under the program

Task 3: Recommend Corrective Action Plan

- Based on the results of Task 1 and 2, determine the gaps vis-à-vis the WB requirements in order to formulate a simple and achievable Corrective Action Plan. The Corrective Action Plan will present corresponding corrective actions presented in a list by landowner/tenant/user, with required budget and deadlines for each action. If there are any issues of non-compliance, describe the severity of non-compliance and provide recommendations of how these might be resolved and what corrective time-bound action plan should be put in place.

Task 4: Develop Recommendations for Standard Operating Procedures (SOPs)

Develop a Standard Operating Procedures for excluding Category A-type subprojects, minimizing involuntary resettlement where possible, and handling resettlement where necessary, covering the criteria, principles, process and procedures for various land acquisition scenarios based on World Bank requirements; Land Acquisition Law and good international practices. The SOP will build on existing MOE processes where possible and will include:

- Site screening checklist to assess land-related risks when evaluating potential sites for school expansions
- Standard due diligence template for each expansion that shows all required information for each site including documenting absence of impact (**NOTE: this template should be employed in the audit and completed templates should be appended to the Audit Report**).
- Procedures for alternate methods such as willing-buyer willing seller¹¹, and voluntary land donation approaches¹²
- Procedures describing the clear institutional arrangements of clearance and approval and payment procedures including coordination with other agencies
- Preparation of eligibility criteria including clear guidelines on the right of tenants, sharecroppers and squatters, as well as partial and temporary acquisition
- Transparency in the process and procedures of the valuation process and land compensation
- Procedures for monitoring land acquisition processes
- Procedures for handling complaints and grievances related to land acquisition;
- Templates and TORs for appropriate documentation and record keeping of all phases of land acquisition including preparation of a Resettlement Action Plan (RAP) or Abbreviated Resettlement Action (A-RAP)
- Deliver a one-day training session with MOE staff (at their premises) on the use of the Standard Operating Procedures.

¹¹ For land acquisition to be considered a voluntary “willing buyer/willing seller” arrangement, the owners of the land must be able to refuse to sell, without the threat of compulsory acquisition.

¹² Criteria for Voluntary Land Donation are defined in the ESSA

Methodology:

It is envisaged that the methods required to be utilized in undertaking the above tasks are as follows:

- i) Conduct a desk review of existing information:
 - Land Acquisition files at the Ministry of Education and any related available files from the Department of Lands and Survey or at Directorate offices;
 - Verification of list of the people compensated/parcels acquired, size and share of acquired plots, compensation, amount held in escrow for compensation and measures taken to notify owners, number of cases and types of measures to address them (e.g., expropriation through courts, process for identifying rightful owner/heir, etc.).
 - Ministry of Education procedures and data reports

- ii) Conduct interviews and meetings with relevant staff at the Ministry of Education head office and Directorate, and at the Department of Lands and Survey:
 - Obtain an understanding of the Ministry of Education land acquisition procedures and process;
 - Obtain clarification regarding compensation methodology and process of land acquisition
 - If there is any delay, then determine reasons for delays in finalizing the land acquisition process (general implantation issues as well as specific reasons for each landowner/tenant/user) and identify how close each case is to being resolved (what remains to be done).

- iii) Conduct site visits and meet with landowners/tenants/users:
 5. Visit a representative sample (e.g. 20%) of school expansion sites and make visual observations of neighboring properties, any current land issues, or historical issues.
 6. Record site observations on Standard due diligence template that shows all required information for each site including documenting absence of impact
 7. Meet with a representative sample of landowners/tenants/users (the specific number will be determined once the number of people has been clarified, but should include no less than 20% of landowners/tenants/users for which census exists. New information may need to be collected for PAPs awaiting compensation in cases where no information exists.);
 8. Obtain an overview of their perspective on payment or compensation and other assistance they have received, and in the case of negotiated settlements, discuss with landowners whether the process was transparent and free of intimidation.
 9. Obtain an overview of changes in livelihoods related to the land acquisition (if any);
 10. Obtain an overview of their ability to maintain their former livelihood standards in their new situations (if any resettlement or significant economic impacts occurred);

11. Obtain an overview of their grievances and suggestions for prompt resolution of the issue.

Deliverables:

1. Audit and Recommendations

- Covering the items in Task 1, 2 and 3
- Employing methodology prescribed in i, ii, iii.

2. Recommendations for Standard Operating Procedure

Covering the items in Task 4

Schedule.

The consultant should propose a lump sum fee inclusive of inclusive days for preparation and travel, field visits and draft and final report preparation. The following outputs and schedule are required.

- Draft Audit Report and Corrective Action Plan – April 15th
- Draft Standard Operating Procedure – April 29th
- Final Audit Report and Recommendations for Corrective Actions and SOP by taking cognizance of Ministry of Education and World Bank comments. May 13th
- Training Session on SOP – by June 5th

Minimum Qualifications

The Lead Consultant for this assignment should have the following qualifications. Additional personnel may be proposed. The consultant should submit CV's, daily rates and key tasks of all assigned personnel.

- Advanced degree in social sciences, or other relevant field
- At least 10 years of applied experience with social safeguards, land acquisition and resettlement, including social surveys and community engagement.
- Demonstrated experience conducting social assessments for IFIs using international standards such as World Bank safeguard policies (preferably OP 4.12)

- Demonstrated experience with the Jordanian regulatory framework governing land acquisition
- Proven ability to write well and deliver written products in a timely fashion
- Experience in capacity building for resettlement projects a plus
- Language skills (Arabic and English)

Reporting Arrangements:

The Consultant will report to Deborah Berger (Senior Social Development Specialist)

Important Note. Issues concerning resettlement are often sensitive and must be dealt with discreetly, taking care not to challenge or antagonize officials involved with the process or to raise any doubts or expectations amongst affected people. The purpose of the Audit is to obtain an overall understanding, and to identify any key issues and any possible non-compliance with the basic tenets of OP 9.0 , namely that households should be at least as well off, and preferably better off, than before displacement. The purpose of the Corrective Action Plan is to formulate a simple and realistic process for dealing with the outstanding procedural issues and compensation.

Ministry of Education will provide all required data and information to the Consultant as support document on this study.

All raw baseline data collected shall be shared with and become the property of Ministry of Education, to be stored by Ministry of Education and used in monitoring project impacts.

Appendix 1: PforR Core Principle #4

Core Principle #4: Program E&S systems manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards

The assessment considers, as may be applicable or relevant under particular PforR Program circumstances, to what degree the PforR program systems:

1) Avoid or minimize land acquisition and related adverse impacts.

- Does the Program screen all planned activities to determine whether they may require involuntary taking of land, relocation of residences or businesses, or restrictions on access to natural resources?
- Do Program processes require identification and mitigation of all significant impacts?
- Do systems adequately protect individuals and communities against “forced evictions?”

2) Identify and address economic or social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to resources they use or occupy.

- As relevant, does screening consider impacts on various property regimes, including common property resources, customary or traditional rights to land or resource use, those who lack title or any recognizable claim, and Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, rights?
- Do Program processes require identification and mitigation of all significant impacts affecting informal users or occupiers of land (or other resources)?

3) Provide compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid before taking land or restricting access.

- Does the borrower’s system recognize the principle of replacement cost when land acquisition or physical relocation is required? If not, can the Program provide supplemental payments to meet this requirement?
- Are transitional expenses allowed under the borrower’s systems? If not, are there mechanisms to mobilize additional resources to support this requirement?

4) Provide supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment).

- Do the Program systems support livelihood restoration and support measures?
- Do the Program systems include the necessary institutional provisions 29 to ensure the effective implementation of such measures?
- If not, can the Program provide supplemental payments to meet this requirement?

5) Restore or replace public infrastructure and community services that may be adversely affected by the Program. Include measures in order for land acquisition and related activities to be planned and implemented with appropriate disclosure of information, consultation, and informed participation of those affected.

- Does the borrower's system recognize the need to restore or replace public infrastructure lost or damaged because of Program activities? If not, what mechanisms are in place to address such concerns under the Program?
- Do land acquisition procedures include appropriate requirements for the informed participation of affected people?
- Does information on land acquisition and/or resettlement provide sufficient notification of the obligations and rights of those affected, including rights to timely resolution of grievances or complaints?

Land Acquisition Audit

Table of Contents

1. Executive Summary: Concisely summarize resettlement (land acquisition) undertaken to date, the need for any on-going resettlement (land acquisition), the magnitude of land acquisition and/or displacement (if any), activities undertaken, grievances and key issues addressed and still outstanding.
2. Background on Land Acquisition and Resettlement process (including livelihood restoration measures, etc.): Provide a brief general description of the project and impacted communities, magnitude of displacement (if any), key impacts, legal framework used to govern resettlement (land acquisition), eligibility criteria and entitlement framework, timing of the various components of land acquisition undertaken, and compensation provided, major or outstanding issues of grievance, proposed timetable for close out.
3. Review Objectives: The main objectives of the land acquisition program and a summary of studies (if any) and activities undertaken in support of land acquisition process.
4. Key Findings: Issues to be considered include:
 - Extent of public information and consultation in advance of land acquisition, and adequacy of on-going consultation;
 - Types of compensation provided and adequacy of that compensation (e.g., sufficient to cover replacement costs of lost assets, housing conditions (if applicable), compensation/entitlements, income restoration and livelihood sustainability measures);
5. Conclusion and Key Recommendations/Corrective Actions: Concisely summarize conclusions and recommendations, and for any gaps or outstanding issues provide a proposed time bound Corrective Action Plan with Key Actions, dedicated Human Resources, Timing and a Budget.
6. Annex with detailed information of landowners, tenants, users.