Public Disclosure Authorized

Public Disclosure Authorized
Public Disclosure

Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 12/21/2019 | Report No: ESRSA00387

BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
St. Lucia	LATIN AMERICA AND CARIBBEAN	P170445	
Project Name	Saint Lucia Human Capital Resilience Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	12/19/2019	2/27/2020
Borrower(s)	Implementing Agency(ies)		
Ministry of Education, Innovation, Gender Relations and Sustainable Development, Saint Lucia	Ministry for Equity, Social Justice, Local Government and Empowerment		

Proposed Development Objective(s)

The objectives of the Project are to improve the labor market relevance of skills in selected sectors and to increase efficiency and coverage of the social protection system in Saint Lucia.

Financing (in USD Million)	Amount
Total Project Cost	20.00

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

No

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

The proposed Project would be structured as a results-based operation, where disbursements would be made against the achievement of select Disbursement-Linked-Indicators (DLIs) in key results areas. The Project will also include a small investment component aiming to support critical actions required for the achievement of the DLIs.

Public Disclosure

The proposed Project aims to strengthen the resilience of Saint Lucia's human capital stock through a two-pronged approach, integrating the strengthening of both Technical and Vocational Education and Training (TVET) and of the social protection system. In particular, the skills component will focus on the promotion of more and higher quality technical and socio-emotional skills and the transformation of the TVET sector from a supply-driven system to a demand-driven system that responds to changing labor market conditions.

To reach its Development Objectives, the project will have three components:

i) Strengthening Technical and Vocational Education and Training (TVET), that seeks to strengthen the enabling framework to the delivery of labor market-relevant TVET, and to enhance the labor market-relevance of TVET offerings at secondary schools, postsecondary institutions, and skills training institutions.

ii) Strengthening the Social Protection System, that will support the strengthening of the social protection policy framework, and improved efficiency of Saint Lucia's social programs, including modernizing procedures, implementation and delivery systems.

iii) Technical Assistance and Project Management, that will support engagement of consultant services to provide specific services related to key results areas of the project; and project management.

The social protection component will concentrate on strengthening the social protection policy framework and improving the implementation of flagship social programs. These components are complementary and integrated through graduation strategies involving paths to self-reliance through skills acquisition for beneficiaries of the social protection programs. The Project would be structured primarily as a results-based operation (Components 1 and 2), where Project disbursements would be made against the achievement of Disbursement Linked Results (DLRs) within six Disbursement-Linked Indicators (DLIs). The Project will also include an investment component aiming to provide technical assistance to support critical actions required for the achievement of the DLIs, as well as support project management.

The Project is aligned with the sectoral and national strategies and supporting the update of the social protection policy and bill. It supports the top-level Education priority identified by the Social and Economic Labs convened by the Office of the Prime Minister, i.e. increased provision of quality, labor market-relevant TVET, and the TVET Policy and Strategy approved by Cabinet in September 2019. The subcomponent on Strengthening the TVET Enabling Environment is explicitly designed to ensure long-term sustainability, e.g. by supporting mechanisms for more continuous assessment of skills needs in the labor market and using this information to support TVET offerings, and by supporting the development of a resource mobilization strategy for sustainable financing of the sector. Each component includes capacity building of Government entities, including activities to strengthen the TVET council; and to enhance social protection policy and provision through upskilled welfare officers and social workers, local authorities, and managerial and technical staff of the Ministry of Equity, among others. Training for staff in implementing ministries will also help mitigate the risks of capacity deficiencies due to staff turnover in this small country context.

D. Environmental and Social Overview

Public Disclosure

Public Disclosure

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

The proposed operation will be implemented at the national level, over a diversity of jurisdictions with different environmental, social and institutional settings. It is aimed to contribute in strengthening St. Lucia's Technical and Vocational Education and Training (TVET) and Social Protection System. Saint Lucia has a population of 180,000 and a Gross National Income (GNI) per capita of US$8,830 as of 2018. Following the 2008 financial crisis, St. Lucia has struggled to regain pre-crisis growth levels. Based on the most recent survey data in 2010, the poverty level fell from 28.8 percent in 2006 to 25 percent in 2016. However, Child poverty rate remains comparatively high, at 34.5 percent in 2016, and the poverty rate in female-headed households is even higher, at 42.3 percent.

In terms of unemployment, female and youth unemployment increased, respectively, from 15.5 to 25.9 percent and from 31.7 to 47.4 percent from 2006 to 2016. 46 percent of the population is classified as not having decent work. There is a large share of employment in the informal sector, mainly in small and microbusinesses

The proposed operation is designed as combination of results-based operation (Component 1 and 2) and investment operation (Component 3). The Investment Project Financing (IPF) will neither finance nor support any civil works activities and major procurement of equipment and goods. In this sense, the activities supported by the Technical Assistance (TA) and Project Management Component are not expected to have any adverse impact on human population and the environment. Social risks are linked to potential exclusion of vulnerable persons either by inefficiencies in the outreach strategies aimed at these groups, or because of systemic discrimination that may exist.

Component 3 (Technical Assistance and Project Management) will finance specific consultancies to support the other components (1 and 2) of the project that are i) strengthening Technical and Vocational Education and Training (TVET), and ii) strengthening Social Protection Service Delivery.

The Project will include teachers' and students' representatives into the stakeholder engagement process. This consultation process will be included in the Stakeholder Engagement Plan. A social assessment has been carried out by the Government and will be published on the Borrower's website and on the Bank's external website before appraisal.

The Social Assessment of the project, considers, in an integrated way, relevant direct, indirect and cumulative risks and impacts of the project, including those specifically identified in ESS1–10, but more specifically to ESS10. The Environmental risk of the project is low. It includes and take into account coordination and consultation with affected and/or vulnerable people and other interested parties, particularly at an early stage, to ensure that all potentially significant environmental and social risks and impacts are identified and addressed.

D. 2. Borrower's Institutional Capacity

The implementing agencies for the Project will be the Ministry of Education, Innovation, Gender Relations and Sustainable Development and the Ministry of Equity, Social Justice, Local Government and Empowerment (MOEQ).

A Project Implementation Unit (PIU) will be established in the Ministry of Education to manage the day-to-day operation of the project. A Social specialist will be hired, and who will be responsible for the management of the Environmental and Social Risk of the Project. To carry out his/her functions, the Social Specialist will have the support of the Project Coordinator and will coordinate with the Technical Coordinator , and Monitoring & Evaluation

Officer. A focal point in the Department of Labor will be also established, to ensure coordination across activities that intersect with labor sector.

Saint Lucia has managed World Bank projects, generally in a satisfactory manner -in terms of safeguards-, (some of them, ongoing) including P127226, the Disaster Vulnerability Reduction Project; P152117 the OECS Regional Tourism Competitiveness Project and P159653 the Caribbean Regional Oceanscape Project or the PIU for the Saint Lucia Health System Strengthening Project (P166783). However, the above-mentioned projects are under the Safeguards policies, which means that the project will likely to need additional capacity support to understand and manage the requirements of the ESF, especially regarding ESS2 (Labor and Working Conditions) and ESS10 (Stakeholder Engagement and Information Disclosure.)

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Low

The environmental risk rating of the project is low based on the due diligence of the project's potential environmental risk and impacts. The project focuses on strengthening TVET in secondary schools, postsecondary institutions, and skills training institutions and strengthening of the social protection policy framework, and improved efficiency of Saint Lucia's social programs. Financing will support training, institutional capacity building, public awareness of social protection programs, and improved learning. The project does not include any civil works and procurement of major equipment. The Component 3 (Technical Assistance and Project Management) will finance engagement of consultant services to provide services and studies to support critical actions required for the achievement of the DLIs.

Social Risk Rating Moderate

Because there is potential of exclusion of vulnerable people by inefficiencies in the outreach strategies, or systemic discrimination may exist, that cause inequitable distribution of project benefits; the Social Risk rating is Moderate. There are risks that vulnerable groups (the poorest, female-headed households , female unemployed, youth unemployed, persons with disabilities, youth at risks, young girls; LGBT people; people expose and vulnerable to shocks and natural disasters, among others) may be excluded from project benefits, if targeted measures are not implemented effectively.

Therefore, the support to these TVET activities , requires the borrower to carry out a robust participatory approach, and that could require further strengthening of its social communication processes, citizen engagement and beneficiary feedback mechanisms. This to ensure inclusion and active participation of beneficiaries from disadvantaged and vulnerable groups and to avoid any kind of discrimination and exclusion that might be present in the current system. A Stakeholder Engagement Plan (SEP) with its Grievance Redressal Mechanism has been prepared to provide inputs, useful to generate strategies to avoid, minimize or mitigate the risks mentioned above. A Labor Management Procedure (LMP) has been developed as well as a Grievance Redress Mechanism for workers.

Public Disclosure

The Social Assessment, that has been carried out for the project, feeds the design of the Stakeholder Engagement Plan, and outlines measure for social inclusions. As part of its Social Engagement strategies, the project activities will also include training for TVET training providers to address bias against persons with disabilities and strategies to promote greater inclusion. In line with the World Bank's commitment to ensure that all education projects are inclusive of persons with disabilities, the project is engaged with continues consultations with the National Council of and for Persons with Disabilities, and

The Environmental and Social Risk Classification (ESRC) will be reviewed by the Bank on a regular basis throughout the project life cycle to ensure that it continues to accurately reflect the level of risk the project presents.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The standard is relevant.

The proposed Project aims to strengthen the resilience of Saint Lucia's human capital stock through a two-pronged approach, integrating the strengthening of both TVET and of the social protection system.

Because of the context of social inequities in St. Lucia, in spite of its benefits, the project's activities pose potential risks of exclusion of vulnerable people by inefficiencies in the outreach strategies of the projects. Environmental risks and impacts are minimal, if any.

To avoid, minimize or mitigate the risks and impacts of exclusion, the project has prepared: a) A Social Assessment (SA) that has informed the formulation of the Stakeholder Engagement Plan (SEP) with its Grievance Redress Mechanism (GRM). A Labor Management Procedures with OHS guidelines as well as the Grievance Mechanism for workers has also been developed. The revised SA , will be finalized no later than one (1) month after the Effective Date.

The Social Assessment (SA) identifies the main benefits as well as the main social risk of the project, and that is the potential for the exacerbation of existing pattern of exclusion, and due to possible inefficiencies in the outreach strategies of the project. Some measures and recommendations to address the negative impacts and risks include but not limited to the following: i) The development and implementation of a robust Stakeholder Engagement Plan (SEP). The SEP must try to capture the views and perceptions of people who may be affected or have an interest in the project and provide an avenue for taking their views into account as inputs to improved project design and implementation, thereby avoiding or reducing adverse impacts, and enhancing benefits. The Grievance Mechanism of the SEP must allow for stakeholders to document their concerns and grievances as well as provide an avenue through which these concerns and grievances can be resolved; ii) The project should promote collaboration among stakeholders (including employers, professional associations, trade unions, vulnerable groups, government

Public Disclosure

organizations) and provide the opportunity to have an input in the design of the various training programs. This will ensure that the programs better meet all needs; iii) Human resource capacity constraints within the Department of Equity and the TVET Unit within the Department of Education should be addressed to allow for the efficient roll out of the project; iv) The Government through the Department of the Public Service will have to institute a period of bonding to ensure that the skills gained by professionals as part of the project are retained; v) Capacity building should be provided to the PIU with support from the World Bank to ensure that the team is familiar with the Bank's policies, procedures and guidelines as well as to allow for the effective implementation of the Project; vi) Curriculum should be tailored to incorporate the requirements of disabled persons; and vii) Government to explore the provision of incentives to Employers to encourage investment in technologies that will increase access to employment opportunities for differently abled individuals.

ESS10 Stakeholder Engagement and Information Disclosure

The standard is relevant. The main stakeholders are: Ministry of Finance, Economic Growth, Job Creation, External Affairs and the Public Service; the Ministry of Education, Innovation, Gender Relations and Sustainable Development; the Ministry of Equity, Social Justice, Empowerment, Youth Development, Sports and Local Government; and Ministry of Infrastructure, Ports, Energy and Labour; Environmental Authority, institutions involved in TVET, Vulnerable population (the poor, women, young girls, youth at risks, disables, LGBT people, others,) students, parents, chamber of commerce, teachers among others.

The social assessment, that the borrower has carried out, has informed the formulation of the stakeholder engagement plan (SEP), that that has been prepared in a manner that is accessible and culturally appropriate, considering the specific needs of groups that may be differentially or disproportionately affected by the project. The SEP outlines a) who the key stakeholders are; b) how they are to be engaged; c) how often the engagement will occur throughout the project; d) how feedback will be solicited, recorded and monitored over the project; e) who will be charged/responsible with this engagement; f) timeline for this engagement. The SEP also describes the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured. The Borrower will implement the grievance mechanism (GRM) – that is in the SEP - to receive and facilitate the resolution of concerns and grievances.

The process of stakeholder engagement has begun during preparation and will continue into implementation. The following measures has been implemented: i) stakeholder identification and analysis, ii) planning how the engagement with stakeholders, and iii) consultation with stakeholder. The World Bank will review the adequacy of the final SEP and if find satisfactory, it will be cleared. The revised SEP will be updated and disclosed no later than one (1) month after the Effective Date, and among other aspects will ensure that: i) minority groups –based on religion, ethnicity, sexual orientation, etc., are properly considered , with specific measures to reach them, including engaging with representative NGOs and where necessary regional or international organizations; ii) indicators and monitoring activities include them; and iii) The GRM includes specific and confidential channels for vulnerable groups.

Public Disclosure

A draft SEP was completed on October 30 and disclosed on December 12, 2019. A revised SEP will be updated and disclosed no later than one (1) month after the Effective Date. The SEP is expected to be updated from time to time as/if necessary. If significant changes are made to the SEP after consultations, a revised SEP should be publicly disclosed.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

The standard is relevant given that the project will be engaged with direct workers and may hire specialized consultants for developing different types of studies and curricula. The project does not intend to be engaged with primary supplier and community workers.

Government civil servants may full-time or part-time be engaged with the project. They will remain subject to the terms and conditions of their existing public-sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to such government civil servants, except for the provisions of Protecting the Work Force (paragraphs 17 to 20) and Occupational Health and Safety (paragraphs 24 to 30,) . applicable to the government civil servants that may be involved in the project implementation or oversight.

Public Disclosure

The standard is relevant given that the project will be engaged with direct workers and may hire specialized consultants for developing different types of studies and curricula. The project does not intend to be engaged with primary supplier and community workers.

Government civil servants may full-time or part-time be engaged with the project. They will remain subject to the terms and conditions of their existing public-sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to such government civil servants, except for the provisions of Protecting the Work Force (paragraphs 17 to 20) and Occupational Health and Safety (paragraphs 24 to 30,) . applicable to the government civil servants that may be involved in the project implementation or oversight.

The borrower has prepared a Labor Management Procedures (LMP) . The LMP provides details in accordance with ESS2 for the applicable category of worker. It requires the borrower to follow the WB procurement rules and procedures as well as applicable national labor regulations to engage in any contracting agreement with firms and/or consultants, and to ensure that standards of the ESS2 Labor and Working Conditions are fully taken into account and are incorporated in the contracting agreements. The procedures also require the project to include specific mechanisms to avoid bias and protect workers against discrimination and harassment, and to promote transparency in terms and conditions of employment, and nondiscrimination and equal opportunity, and specify a labor specific grievance mechanism for project worker, separate from the project level GRM. As part of the process of managing work, the LMP sets out statements of the national legal framework, and of ESS2, to prevent and address harassment, intimidation and/or exploitation, provisions for freedom of association. The LMP also addresses the

need for workers to adapt and receive training on Code of Conducts as well as on OHS measures required under ESS2.

Draft LMP was completed on October 30 and disclosed on December 12, 2019. The revised LMP will be finalized no later than two (2) weeks after the Effective Date and implemented throughout Project implementation.

ESS3 Resource Efficiency and Pollution Prevention and Management

The standard is not relevant since the project will not support any physical work and procurement of any major equipment.

ESS4 Community Health and Safety

This Standard is currently not relevant as there are no works associated with this project and therefore the community health is not at risk.

Public Disclosure

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The standard is currently not relevant. The project is not expected to generate any physical infrastructure and therefore will not include the taking of land either by involuntary or voluntary means.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The standard is currently not relevant. The project does not involve activities that could cause risks or potential impacts to biodiversity or natural habitats, nor does it involve sustainable management of living natural resources.

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

The standard is not relevant. Previous social assessment undertaken by previous World Bank Projects concluded that there are no indigenous communities present in project area.

ESS8 Cultural Heritage

The standard is currently not relevant.

No new physical infrastructure and/or excavation work is expected . The project does not envisage any impacts on physical, cultural, and/or archeological sites.

Public Disclosure

ESS9 Financial Intermediaries

This standard is not relevant. The project does not involve a financial intermediary as defined by ESS9

B.3 Other Relevant Project Risks

NO

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

The project doesn't include activities which would involve the use or potential pollution of any international waterway.

OP 7.60 Projects in Disputed Areas No

No disputed areas are part of the intended project area of influence.

III. BORROWER'S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
Social Assessment.	10/2019
ESS 10 Stakeholder Engagement and Information Disclosure	
Stakeholder Engagement Plan with its Grievance Redress Mechanism.	10/2019
ESS 2 Labor and Working Conditions	
Labor Management Procedure with its Grievance Redress Mechanism for workers.	10/2019
ESS 3 Resource Efficiency and Pollution Prevention and Management	
ESS 4 Community Health and Safety	
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
ESS 8 Cultural Heritage	
ESS 9 Financial Intermediaries	

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

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

None.

IV. CONTACT POINTS

World Bank

Contact:	Ingrid Bjerke	Title:	Education Spec.
Telephone No:	458-1725	Email:	ibjerke@worldbank.org
Contact:	Shawn Michael Powers	Title:	Economist
Telephone No:	458-5968	Email:	spowers1@worldbank.org
Contact:	Clemente Avila Parra	Title:	Social Protection Economist
Telephone No:	5782+4274 /	Email:	cavilaparra@worldbank.org

Borrower/Client/Recipient

Borrower: Ministry of Education, Innovation, Gender Relations and Sustainable Development

Borrower: Saint Lucia

Implementing Agency(ies)

Implementing Agency: Ministry for Equity, Social Justice, Local Government and Empowerment

V. FOR MORE INFORMATION CONTACT

Public Disclosure

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

Public Disclosure

VI. APPROVAL

Public Disclosure

Task Team Leader(s):	Ingrid Bjerke, Shawn Michael Powers, Clemente Avila Parra
Practice Manager (ENR/Social)	Maria Gonzalez de Asis Cleared on 20-Dec-2019 at 00:18:3 EST

Public Disclosure