

# Concept Environmental and Social Review Summary Concept Stage (ESRS Concept Stage)

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Oct 10, 2019 Page 1 of 12

El Salvador Early Childhood Care and Education Project (P171316)

#### **BASIC INFORMATION**

#### A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
El Salvador	LATIN AMERICA AND CARIBBEAN	P171316	
Project Name	El Salvador Early Childhood Care and Education Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	1/6/2020	3/16/2020
Borrower(s)	Implementing Agency(ies)		
Republic of El Salvador	Ministry of Education		

# Proposed Development Objective(s)

The Project Development Objectives are to: (i) improve ECCE teaching practices nationwide; (ii) upgrade physical learning environments of selected ECCE Centers; and (iii) strengthen MINEDUCYT's institutional capacity for educational assessment.

Total Project Cost

Amount

250.00

# 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]

With the objective of improving learning outcomes and Early Childhood Development (ECD) of children from 0-7 years old, the Project would: (i) Support the implementation of the CRECER JUNTOS Early Childhood Education quality model (QM), aimed at establishing the quality of the provision of Early Childhood Care and Education (ECCE) services, and support its rollout nationwide; (ii) Strengthen the ECCE workforce's development to improve its quality, with a special focus on in-service ECCE personnel nationwide; (iii) Upgrade ECCE physical learning environments to increase access to quality ECCE in selected municipalities; and (iv) Strengthen MINEDUCYT's capacity for education sector and project management.

Oct 10, 2019 Page 2 of 12



D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social] The development of the new Early Childhood Care and Education (ECCE) Quality Model is national in scope, while the specific infrastructure interventions will be carried out in selected public PreK and Kindergarten (KG) buildings to be identified. The selection of ECCE Centers to be intervened will be done in two phases: i) selecting the country areas with highest poverty levels, poorest performance on key education indicators, such as access to ECCE services and learning outcomes, and ii) selecting centers showing an increasing demand for ECCE services that have potential to be physically expanded or reorganized to serve more children and/or new ECCE levels.

Given the national scope of the project, indigenous peoples in El Salvador will be project beneficiaries. There are important enrollment gaps between the indigenous and non-indigenous population and between rural and urban populations at all education levels in El Salvador. In addition, ECCE enrollment in rural areas and among the lowest quintile are 39% and 10%, respectively. Some issues surrounding early childhood education of indigenous peoples include geographic remoteness and difficult access to communities, lack of teachers willing to work in indigenous communities and capable of contextualizing content based on local realities and culture, and lack of quality infrastructure and culturally adequate educational materials.

In addition, El Salvador has high levels of contextual violence, particularly in three domains: domestic violence, sexual violence against women, and street/gang related violence. Gender-based violence is highly prevalent in El Salvador. In 2017, at least 10880 acts of violence against women were committed, which is equivalent to a rate of 599.4 per 100,00 women.

Environmental context. Specific investment sites under the project for expansion and/or rehabilitation of existing public PreK and Kindergarten (KG) buildings have not yet been identified but are expected to focus on areas nationwide (potentially both urban and rural) with the highest poverty levels, poorest performance on key education indicators, and highest demand for expanded ECCE services. Most of the existing public PreK and KG facilities nationwide are integrated within larger school facilities also providing educational services for older children and adolescents; however, total availability is low, with only 682 Public schools offering Pre-K and 4,523 offering Kindergarten out of a total of 5,303 public schools. Structural reinforcement is also needed for many of the existing school buildings, with a 2018 World Bank study estimating that 8% have a high risk of collapse and 65% have a moderate risk of collapse. In addition, only 80 percent have access to drinkable water services, with substantial differences between rural (74%) and urban areas (96%). Most ECCE centers are operating in old buildings built with an adult-based approach, limiting young children's learning potential, and have not been designed with consideration for space flexibility, luminosity, spaces for play and rest, ecological sustainability, safety, and/or comfort. Most public ECE Centers also lack complementary and recreational infrastructure critical for outside play, despite the fact that the national curriculum for ECCE includes activities that require this type of infrastructure for their implementation.

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

The project will be implemented by the Ministry of Education (MINEDUCYT), under the technical leadership of the Early Childhood National Directorate (DNPI). MINEDUCYT has recent experience with the Education Quality Improvement Project (P126364), which included application of the Bank's safeguards policies, including OP 4.01 and OP 4.10. This previous project prepared and implemented an Environmental Management Framework and an

Oct 10, 2019 Page 3 of 12

# The World Bank El Salvador Early Childhood Care and Education Project (P171316)

Indigenous Peoples Plan. Lessons learned under this previous project include the need for more robust institutional arrangements and contractor capacity for environmental and social management during infrastructure design and construction to ensure compliance with the environmental and social management plans and national law requirements and avoid delays. In addition, the previous project achieved important developments in strengthening services in the Nahuat language. Capacity strengthening measures to fill gaps and to help embed environmental and social risk management systems more fully and permanently within the ministry structure and policies — including on the new substantive coverage areas under the ESF - will be integrated into the project design.

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

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

Substantial

#### **Environmental Risk Rating**

Moderate

The proposed environmental risk classification is Moderate, based on the investments under Component 3 that will finance expansion and / or rehabilitation of existing PreK and KG buildings. The potential environmental impacts and risks associated with these activities are deemed to be moderate as they are expected to be i) predictable, temporary and/or reversible or easily mitigable; ii) low in magnitude and site-specific; iv) occurring in already-intervened areas. In addition, the client has gained recent experience in environmental management and oversight under a previous World Bank financed project that included school infrastructure rehabilitation types of investments. This existing experience and capacity will be built upon and further developed and embedded under the proposed project.

Social Risk Rating Substantial

The proposed social risk classification is Substantial. The project is mainly expected to have positive social impacts from increased quality of ECCE service delivery. Social risks of the project may include exacerbating existing inequalities if potential impacts to and barriers to access for girls, children with disabilities, indigenous peoples, children living in poverty or geographical isolation and other vulnerable and disadvantaged individuals or groups are not properly identified and addressed; and risk that indigenous peoples may not receive early childhood education in their mother tongues, as well as prejudice or discrimination towards individuals or groups in the provision of services and resources. In addition, high levels of contextual violence, including gender-based and domestic violence, as well as gang related violence, constitute a significant access barrier to project benefits. The borrower has previous experience with World Bank safeguards, including indigenous peoples' issues, and measures to strengthen capacity for social management will be included in the project.

# 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 project seeks to support Early Childhood Care and Education (ECCE) in El Salvador through the development and implementation of a new Quality Model (QM) to define learning objectives and milestones for each age, as well as minimum quality standards in the areas of i) ECCE curriculum; ii) ECCE workforce competences and skills; iii) teaching and learning processes, iv) physical infrastructure and environments; v) family and community engagement; vi) children's development or educational assessment; among others. The project is envisaged to include five

Oct 10, 2019 Page 4 of 12



El Salvador Early Childhood Care and Education Project (P171316)

components: (1) Developing the CRECER JUNTOS Early Childhood Education Quality Model (estimated financing US\$20 Million); (2) ECCE Workforce development (estimated financing US\$ 40 Million); (3) physical investments to upgrade / expand ECCE Learning environments (estimated financing US\$120 Million); (4) MINEDUCYT institutional strengthening and project management and evaluation.

The upgrade to ECCE learning environments shall incorporate climate resilience and disaster risk mitigation design principles, ensure that water supply and drainage systems are in place, that universal access is incorporated into the rehabilitation and furnishing of learning environments and that appropriate recreational and outdoor spaces are developed. In some locations, it will also include expansion of existing facilities to accommodate additional children.

Based on the scope of the project's activities, which include technical assistance, capacity building, and infrastructure interventions for which the exact locations and extent of the work are not yet known, the Borrower will be asked to prepare, consult with main stakeholders, and disclose both in country and on the Bank's website prior to appraisal, an Environmental and Social Management Framework (ESMF). The ESMF will be new for the project and will include: (a) an Environmental and Social Assessment (ESA) describing baseline social and environmental conditions, identifying potential environmental and social risks, impacts and opportunities associated with the proposed activities; evaluating design alternatives and formulating generic mitigation, management and monitoring measures to address the expected likely impacts and issues, and (b) the principles, guidelines and procedures for carrying out site-specific screening and assessment, confirming and incorporating appropriate management and mitigation measures into contract documents, and ensuring effective implementation and monitoring at the subproject level.

The ESMF (including ESA) will, in particular, consider i) requirements for coordination and consultation with beneficiaries and affected persons to ensure that potentially adverse environmental and social risks are identified and managed; ii) the implementation of technically and financially feasible design measures for improving energy, water and raw materials use and promoting greater climate and natural disaster resilience; iii) measures to avoid, minimize or mitigate any potential adverse impacts on biodiversity and on the sustainable management of living natural resources; iv) facility and community safety during construction and operation; and v) measures to strengthen Borrower capacity for the management and oversight of environmental and social risks.

From a social perspective, the ESMF (including ESA) will consider, amongst others: i) the socio-cultural, institutional, historical and political context where the project will operate, as well as potential risks, barriers to access, and opportunities for greater inclusion of vulnerable and disadvantaged groups including women and girls, indigenous peoples, those living in extreme poverty or geographical isolation, and students with disabilities; ii) the need for cultural and language adaption of the curriculum and classroom materials to the context and realities of indigenous peoples, as well the need to ensure that ECCE workers in indigenous communities are sufficiently qualified from a cultural and language perspective to work with indigenous students; iii) the existence of discriminatory practices in enrolment and participation of students with disabilities and opportunities to improve the curriculum and educational materials to ensure they are accessible and tailored for all, as well as to improve the qualifications of the ECCE workforce to work with students with disabilities; iv) the risks related to contextual crime and violence, including gender-based violence and domestic abuse, and possible mitigation measures; and v) how curriculum and educational materials can be used to influence social norms and attitudes related to gender-based violence and domestic abuse.

Oct 10, 2019 Page 5 of 12



El Salvador Early Childhood Care and Education Project (P171316)

The ESMF will also include procedures for screening subprojects involving civil works for i) the presence of indigenous peoples per the criteria in ESS7 in the project area, ii) the need for land acquisition, restrictions of land use, or involuntary resettlement, or land tenure issues, and iii) potential sites of physical cultural heritage. For cases where subprojects meet one or more of the above criteria, the ESMF will describe how the Resettlement Policy Framework (RPF), and/or Indigenous Peoples Framework (IPPF), and/or chance finds procedures will apply.

The ESMF shall detail, in a generic manner, measures to be implemented during the project execution stage, namely during the construction and operational phases of the proposed activities (once defined), to mitigate the environmental and social impacts of planned activities. These measures will in turn be confirmed and tailored, as required, to specific subprojects once identified during project implementation, and reflected in subproject implementation arrangements (including contractor bid documents for construction phase measures). Such measures are expected to include:

- Waste Management Plan (construction), including measures for handling and disposal of asbestos and other hazardous materials which may be removed during demolition / remodeling of existing facilities
- Plan for Sourcing and Transportation of Construction Materials
- Traffic Management Plan (construction)
- Community Security Health and Safety Plan (construction)
- Security Personnel management plan (if required)
- Occupational Health and Safety Measures
- Chance find screening procedures and protocols
- Emergency Preparedness and Response Plan (operation phase)
- Waste Management Plan for Operation (operation phase) (including e-waste as well as non-hazardous waste)

In addition to the ESMF, and prior to appraisal, the Borrower and Bank shall jointly agree upon and disclose an Environmental and Social Commitment Plan (ESCP) detailing measures and actions to implement the ESMF and ensure compliance with the ESF during project implementation.

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

El Salvador counts with various national laws and regulations related to Environmental Impact Assessment, licensing and management, as well as labor management and other areas covered by the ESF. While these laws and regulations will be complied with as they apply to project activities, the project does not expect to rely on these existing systems for E&S management of the project.

#### **ESS10 Stakeholder Engagement and Information Disclosure**

The project will be asked to prepare and disclose, both in country and on the Bank's website, and as soon as possible and prior to appraisal, a Stakeholder Engagement Plan (SEP), which will i) describe the project stakeholders, making a distinction between those directly affected by the project and other interested parties; ii) describe the timing and methods of engagement with key stakeholders throughout the life cycle of the project, including engagement activities before project appraisal, as well as local-level consultations once the locations of infrastructure interventions is known; iii) describe the type of information that will be provided to stakeholders and how feedback from stakeholders will be solicited and recorded, iv) if necessary, include differentiated measures to remove

Oct 10, 2019 Page 6 of 12



El Salvador Early Childhood Care and Education Project (P171316)

obstacles to participation as well as allow the effective participation of those identified as disadvantaged or vulnerable, and v) describe the project-level Grievance Mechanism to be developed by the borrower.

The SEP will also develop a project-level Grievance Redress Mechanism (GRM) accessible to project affected parties per the requirements of ESS10, such a system, where possible, will use and strengthen existing grievance redress arrangements within MINEDUCYT.

Prior to appraisal, MINEDUCYT will disclose information and organize stakeholder engagement activities to share and seek feedback on the overall project design and components, the SEP including proposed GRM, as well as the project's ESMF and ESCP.

# **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**

Worker categories under ESS2 that may be relevant in the project include direct workers in the form of MINEDUCYT staff hired to work on the project, including consultants and supervising consultants, contractor workers for infrastructure activities, as well as potentially community volunteers. The project is also expected to have government civil servants working in connection with the project, who will remain subject to the terms and conditions of their existing public-sector employment agreements, 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, and Occupational Health & Safety).

The borrower will be asked to develop written Labor Management Procedures (LMP) identifying and describing the different types of workers that are likely to be involved in the project and set out the way in which they will be managed, in accordance with the requirements of national law and ESS2. If necessary, the LMP will describe how agreements with community volunteers will be reached, and the terms on which such labor will be provided, including how the voluntary nature of the work will be ascertained and documented, how the community volunteers will be represented, and the methods by which community volunteers can raise grievances in relation to the project. The LMP will also assess any Occupational Health and Safety (OHS) risks involved for different activities and will provide linkages to the ESMF to ensure that OHS measures are also identified at the site-specific level and incorporated into site-specific ESMPs for contractors. The LMP will describe a GRM accessible to project workers.

Occupational health and safety hazards associated with civil works under the project may, amongst others, include i) traffic related accidents and incidents associated with transport of personnel and materials to and from work sites; ii) damage or injuries resulting from demolition and construction works; iii) falls from heights during demolition and construction activities; iv) falls into excavation sites or collapsing trenches; v) electrocution; vi) failure to use adequate personal protective equipment; vii) slips, trips and falls; viii) material and manual handling and ix) potential exposure to asbestos and lead. Contractors shall develop Health and Safety plans appropriate for each work site. For work in urban environments, contractors shall assess site specific hazards, including changes to traffic flows and required measures such as the deployment of traffic controllers or safety signage and barriers, additional security

Oct 10, 2019 Page 7 of 12



El Salvador Early Childhood Care and Education Project (P171316)

measures to ensure safe work environments inside the work areas and in their immediate vicinity. Emergency preparedness and response plans shall be developed, adequate OHS training shall be provided to workers, incidents will be reported and investigated and corrective measures implemented to prevent recurrence. These aspects will be detailed in the ESMF.

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

Energy efficiency: Technically and financially feasible energy efficiency and climate resilience measures shall be considered and incorporated into the design of new buildings, including efficient lighting, cooling and heating. The Borrower will promote the sustainable use of water and construction raw materials.

Pollution management: Waste management practices will aim to avoid, reduce, reuse or dispose of waste materials in a manner that is safe for human health and the environment. The ESMF will include Guidelines for the development of site-specific Waste Management Plans during construction (including demolition) of infrastructure activities under Component 3. Specific measures will aim to ensure there is no soil, water and/or air contamination from handling and disposal of construction waste, specifically hazardous materials such as asbestos. The ESMF shall include guidelines for the development of Waste Management Plans for the operation phase under Component 3 and where applicable, shall make reference to the adequate disposal of e-waste.

The potential for existing environmental liabilities will be assessed during the environmental assessment, and at the site level in the detailed site planning process. Where potential liabilities are identified, these shall be assessed and where necessary, remedial plans developed and executed. These requirements will be outlined in the ESMF.

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

Infrastructure and equipment design and safety: The Borrower will ensure that the design of new and retro-fitted infrastructure under Component 3 will guarantee sanitary conditions (water availability) and apply the concept of universal access, such as the inclusion of access ramps, guard rails, the use of lead free paint and access to services without differentiation for those with disabilities (for example restrooms) and specific to the needs of the target population (chairs and tables in classrooms). Infrastructure shall also be designed and built to be climate resilient, reducing the vulnerability to natural disasters including seismic activity and flooding.

Community health and safety during construction: The Borrower will ensure that plans are in place to mitigate the risks associated with construction activities to direct beneficiaries and neighbors. Key risks are related to increased vehicular traffic and changed traffic patterns impacting road safety conditions, dust, noise and vibration. Construction sites may also pose a risk to beneficiaries and neighbors especially if construction activities are planned to take place in parallel with ongoing teaching activities. If temporary facilities are needed for current students displaced by the construction activities, these will also need to be designed, constructed and appropriately managed as part of the construction process. These and other issues will be reflected in the ESMF, which will provide guidance on the development of Community Health and Safety Plans for construction activities at the subproject level. Given the security context of El Salvador, it is possible that contractors in some locations may need security forces; if

Oct 10, 2019 Page 8 of 12



El Salvador Early Childhood Care and Education Project (P171316)

required then security personnel management plans will also be required for these locations, in accordance with this standard.

Community health and safety during operation: Key community health and safety risks are associated with the security and safety of the children in the case of (i) the failure of the infrastructure built under Component 3 in the event of natural disasters or other emergencies, or (ii) inadequate maintenance of facilities leading to unsanitary or unsafe conditions. The ESMF will include Guidelines for the development of site-specific Emergency Response and Preparedness Plans, which will include general emergency response and preparedness planning and training procedures, as well as operations-phase facility maintenance requirements.

In addition, the project will identify, assess, and include mitigation measures for risks of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), as needed based on the results of the Social Assessment, including for ongoing monitoring during project implementation.

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

Component 3 of the project includes minor construction, expansion, and rehabilitation of buildings. Such interventions may require minor land acquisition and economic displacement. The project will seek to avoid involuntary resettlement or, when unavoidable, minimize it by exploring alternative project sites. The project is not expected to include restrictions of access to legally designated parks and protected areas. Given that the specific sites for infrastructure interventions will not be known during project preparation, the borrower will be asked to prepare a Resettlement Policy Framework (RPF) prior to appraisal. The RPF will set out the procedures to be followed for the preparation of Resettlement Action Plans (RAPs) per the requirements of ESS5, when a subproject is expected to require land acquisition, restrictions of land use, or involuntary resettlement, as well as eligibility criteria for affected persons, procedures and standards for compensation, and arrangements for consultations, budget, monitoring, as well as how the project-level GRM will address involuntary resettlement-related grievances.

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

The specific locations of the centers to be intervened are still to be determined; however, due to the fact that works will consist only of rehabilitation or expansion of existing schools and learning centers, which are likely to be located in already intervened areas near settlements or in urban settings, it is not expected that any of the project activities will have a significant effect on biodiversity or natural resources. Nonetheless, given that specific site locations are not known, the ESMF shall provide generic guidance on measures to avoid, minimize or mitigate potential impacts on biodiversity and on the sustainability of living natural resources. Screening processes shall be in place to prevent siting of facilities in or near natural or critical habitats, protected and/or internationally recognized areas and any residual impacts will be addressed through site-specific mitigation measures.

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

According to the most recent census, there are around 14,300 indigenous peoples in El Salvador, representing about 0.7% of the population. As the project is national in scope, Indigenous Peoples will be beneficiaries. In addition, some

Oct 10, 2019 Page 9 of 12

El Salvador Early Childhood Care and Education Project (P171316)

of the selected municipalities for the infrastructure interventions may be in areas where indigenous peoples fitting the definition of ESS7 may be present or have collective attachment to the project area.

The Borrower will be asked to prepare, consult, and disclose an Indigenous Peoples Planning Framework, which will draw on the results of the ESA and will focus on identifying barriers to access and ensuring project benefits are culturally pertinent, including in relation to the development of the curriculum, educational tools, and educational agent training. The IPPF will describe how indigenous people's issues will be integrated in the different technical assistance and training products.

The IPPF will also outline how subproject specific IPPs will be prepared in cases where infrastructure interventions are carried out where indigenous peoples are present or have collective attachment to the project area, per the criteria in ESS7.

The Stakeholder Engagement Plan will describe the overall approach to engaging with nationally representative indigenous peoples' organizations as well as indigenous communities in cases where they are present in specific project sites. The SEP will be developed in a culturally appropriate manner to allow for proper consultations and engagement for IPs.

# **ESS8 Cultural Heritage**

At this stage the project is not expected to have negative impacts on cultural heritage, whether it is tangible or intangible as all civil works are expected to take place on sites with existing infrastructure. However, given the possibility that civil works may include excavations, screening criteria will include identification of any identifiable cultural heritage early in the design process, screening procedures and chance finds protocols will be included in the ESMF and will be incorporated into subsequent subproject-level ESMPs.

#### **ESS9 Financial Intermediaries**

This standard is not relevant.

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

There is a security risk related to crime and violence in El Salvador, which may impede safe access to education centers for both students and project contractors. This risk will be assessed as part of the social assessment mentioned in the above sections and related measures will be included in the ESMF and site-specific instruments, as appropriate.

All environmental and social risks associated to the project investments identified at this stage have been described in the sections above. The environmental and social assessment to be prepared will evaluate any other potential risk that may be connected to the activities that will be financed under the IPF as they are further defined during preparation.

Oct 10, 2019 Page 10 of 12

#### C. Legal Operational Policies that Apply

#### **OP 7.50 Projects on International Waterways**

No

This policy does not apply as the project is not expected to include activities which would have any effect on international waterways.

# **OP 7.60 Projects in Disputed Areas**

No

This policy does not apply as the project is not expected to work in disputed areas.

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

# A. Is a common approach being considered?

No

# **Financing Partners**

None

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

# Actions to be completed prior to Bank Board Approval:

Actions to be completed prior to Bank Board Approval:

Prepare, consult, and disclose an ESMF including the following:

- 1. An ESA outlining the project's risks and impacts, as well as access barriers to project benefits and opportunities for greater inclusion of vulnerable and disadvantaged groups, including mitigation measures.
- 2. Generic mitigation and management measures to address likely risks and impacts for infrastructure interventions
- 3. Procedures and guidelines (including screening tools, checklists, institutional responsibilities and budget) for carrying out subproject level assessment and confirming site-specific mitigation and management measures during project implementation

Prepare, consult, and disclose a Stakeholder Engagement Plan (SEP) covering both preparation and implementation phases of the project.

Prepare, consult and disclose an Indigenous Peoples Planning Framework (IPPF)

Prepare and disclose a Resettlement Policy Framework (RPF)

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

1. Preparation and implementation of Labor Management Procedures, including a GRM for project workers

Oct 10, 2019 Page 11 of 12

El Salvador Early Childhood Care and Education Project (P171316)

- 2. Implementation of the ESMF at the subproject level, including development of site-specific ESMPs as required (to cover all relevant issues as outlined in above ESSs).
- 3. Implementation of the IPPF and any subsequent IPPs.
- 4. Implementation of the RPF and any subsequent RAPs.

# C. Timing

**Tentative target date for preparing the Appraisal Stage ESRS** 

15-Dec-2019

#### **IV. CONTACT POINTS**

**World Bank** 

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**Borrower/Client/Recipient** 

Borrower: Republic of El Salvador

Implementing Agency(ies)

Implementing Agency: Ministry of Education

#### V. FOR MORE INFORMATION CONTACT

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# VI. APPROVAL

Task Team Leader(s): Katia Marina Herrera Sosa, Enrique O. Alasino Massetti

Practice Manager (ENR/Social) Valerie Hickey Recommended on 10-Oct-2019 at 12:19:42 EDT

Safeguards Advisor ESSA Noreen Beg (SAESSA) Cleared on 10-Oct-2019 at 13:34:15 EDT

Oct 10, 2019 Page 12 of 12