Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Malawi	AFRICA EAST	P174329	
Project Name	Malawi Education Reform Program (MERP)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	10/5/2020	2/26/2021
Borrower(s)	Implementing Agency(ies)		
Republic of Malawi	Ministry of Education, Science and Technology		

Proposed Development Objective
to strengthen learning environments in lower primary

Financing (in USD Million)	Amount
Total Project Cost	48.60

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]

Education is a key national priority area for Malawi. Education and Skills Development are among the nine Key Priority Areas (KPAs) within the Malawi Growth and Development Strategy III, 2017-2022. The Government's National Education Sector Plan (NESP), 2008-2017, and related Education Sector Implementation Plan (ESIP) 2013-2018, is supported by the current ESPIG, the Malawi Education Sector Improvement Project (MESIP, P158145) of US$ 44.9 million funded by Global Partnership for Education (GPE). Following a two-year transition period between sector plans, the Ministry of Science, Education and Technology (MoEST) is finalizing the National Education Sector Investment Plan (NESIP) 2020-2030; this will translate into a five-year costed implementation plan, the Education Sector Implementation Plan (ESIP) III (2020-2025), currently under development. The proposed project will support NESIP and ESIP-III, in particular the strategic objectives for primary education: improved equitable, inclusive access

and participation; improved quality and relevance of teaching and learning; and efficient governance, management and accountability of service delivery.

The project supports a combination of targeted investments at Standard 1 and 2 levels, and provides incentives to districts and direct support to schools to address the constraints which prevent schools from providing quality education. Key elements include:

- Improving learning environments in lower primary, supporting expansion and reform of the PSIG program provide more needs-based support to schools facing severe disadvantages in staffing and learning conditions in lower grades;
- Supporting girls' learning, providing training to headteachers, deputy headteachers, selected female teachers, zone-level Primary Education Advisers, and inspectors to (1) create a positive and inclusive culture towards over-age children and girls; (2) Improve teacher's motivation and morale and reward performance; and (3) Improve the efficiency and equity of school resource utilization and (4) maintain and utilize academic records to support low-performing students;
- Policy reform for improved efficiency, equity and learning (Variable part), to provide incentives for system-level reform of policy and resource allocation, with performance-based conditions (PBCs).

The project development objective is to strengthen learning environments in lower primary.

PDO Level Results Indicators (tentative):

1. Pupil-classroom ratios (PCRs) in lower primary [Number], by grade, average and interquartile range
2. Pupil-qualified teacher ratios (PQTRs) in lower primary [Number], by grade, average and interquartile range
3. Student dropout rate in lower primary [Percent], disaggregated by grade and gender

PBCs are tentatively as follows:

1. Recipient has met the annual target for the share of schools receiving Primary School Improvement Grants by October 31 in accordance with the PSIG formula [Percent]
2. Recipient has met the annual target for the share of schools with pupil-teacher ratios in Standards 1-2 in the acceptable range [Percent]
3. Local Government Authorities have met the annual target for the completion of activities to improve distribution of female teachers [Percent]

The project is expected to invest in all public primary schools in Malawi, with benefits for 5,187,634 students. In particular, the project is expected to benefit female students (2,622,290).

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will support national implementation of a focused, coordinated sector-wide approach providing a minimum package of support for all schools, with smart, data-driven targeting, top-up resources for needy schools commensurate with the specific challenges faced. The main environmental and social are associated with financing the construction of low cost learning shelters within Component 1. Construction will be conducted by communities in accordance with a standardized design. This is currently under development by Government, adapted from the standardized design for learning shelters used under MESIP. The updated design is anticipated to be in place prior to effectiveness. Construction will be done using community artisans but supervised and quality-assured by the Clerk of Works in each district and by the Education Infrastructure Management Unit. Works are expected to consist of learning shelters (1000-1500 in number) with single or twin learning rooms with potentially one or more blocks to be constructed or rehabilitated within a school. Also included in the component is the construction of gender-specific infrastructure within the schools, notably girls' changing rooms (up to 500) which are expected to be similarly small-scale and infrastructure will be designed to ensure universal access taking into account of accessibility for people and learners with disabilities, whose prevalence stands at 3% among children, according to the 2018 census. Component 4 Reform for Effective Schooling and Equitable Learning also includes provision for the construction of housing (up to 100) for female teachers at schools in remote areas. All of the civil works are limited to existing educational campuses/facilities/premises and be of a scale where risks and impacts are not anticipated to be significant, long term, complex or diverse. No new construction of schools is supported through the project. The construction/rehabilitation will entail works that may result in the creation of solid waste, noise/air pollution and minor congestion due to the use of vehicles and machinery. Additionally occupational health and safety risks and community safety impacts including GBV/SEA/SH that may result from learners interaction with external workers and school personnel can be anticipated. The civil works are not anticipated to result in the loss of or impact on high conservation value habitats. Being in existing urban settings these areas are not expected to pose any additional environmental risk. Potential environmental and social risks or impacts of conducting the TA under component 2 and 4 are expected to be negligible and will not result in significant potential adverse risks. As the exact locations of project investments are not yet determined, an ESMF will be prepared to ensure that a process of identifying, assessing, and mitigating environmental and social impacts is integrated in the development of the specific subprojects.

D. 2. Borrower's Institutional Capacity

The Ministry of Education, Science and Technology (MoEST) will be the main implementing agency on behalf of the Government of Malawi; under the overall leadership and coordination of the Directorate of Planning and Directorate of Basic Education. Line agencies and institutions that will be involved include the Malawi Institute of Education (MIE), the Teaching Service Commission (TSC) and Malawi College of Distance Education (MCDE). In addition, the 34 Education Districts will play a key role in day-to-day implementation and achievement of results. The Government and the Ministry in particular already has considerable experience and developed PIUs which have managed similar school-construction related risks and impacts within Malawi Education Sector Improvement Project (MESIP, P158145), Equity with Quality and Learning at Secondary (EQUALS, P164223) and Investing in Early Years for Productivity Project (IEYP P164771). These projects have built increasingly competent capacity for preparing and implementing safeguards instruments and monitoring safeguards compliance of construction contractors. The PIUs have not implemented any project that applies the ESF. However, the safeguards specialists have been trained on the ESF and further capacity building will be outlined in the ESCP. The role of the Clerk of Works in each district will be crucial for ensuring that construction work complies with the design standard and is carried out in a manner which complies with World Bank requirements on OHS and community safety. The ESMF should include details of ToR and capacity requirements for Clerks of Work as well as a means to ensure benchmarking across all districts to maintain standards.

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

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Moderate

The project is proposed to be rated as MODERATE for environmental risk.
Risks and impacts are to be anticipated and may potentially result in adverse environmental and social impacts. However, they are expected to be temporary in nature and scope, will be reversible and/or easily and efficiently mitigated. Further, it is expected that impacts will be limited, site-specific and may not affect an area broader than the sites of the physical works themselves and may not impact beyond the surrounding local communities. As the key activities are expected to be within or adjacent to existing school campuses it is unlikely that any sites will impinge on natural resources or areas of high conservation values. The project will have to ensure (through the ESMF and subsequent ESMPs) that building materials such as sand and gravel are from sustainable sources and not obtained from sources that will cause adverse impacts on natural resources. Being located within existing towns and villages large scale clearing of vegetation of high conservation value is considered unlikely. However, the exact locations/sites of project investments are not yet defined and identified. Therefore, a framework approach to safeguards will be adopted. Potential social and environmental risks and impacts and subsequent mitigation and management measures will be outlined in the disclosed ESMF. Construction will be conducted by communities in accordance with a standardized design. This is currently under development by Government, adapted from the standardized design for learning shelters used under MESIP. Finalization of the updated design will be a condition of effectiveness. Construction will be done using community artisans but supervised and quality-assured by the Clerk of Works in each district and by the Education Infrastructure Management Unit. Clerks of Works will be recruited and capacity requirements will be part of the ToR, the Education Infrastructure Management Unit will be subject to capacity assessment and necessary capacity building undertaken. As the scope of the planned interventions is developed during project preparation this assumption will be revisited and if necessary the environmental risk rating reconsidered.

Social Risk Rating Moderate

The project is proposed to be rated as MODERATE for social risk.
Screening undertaken considers the main potential social risks to be in relation to possible health and safety both for workers, school personnel, surrounding communities and learners during construction, exclusion of vulnerable populations such as learners living with disability and possible GBV/SEA/SH arising from the close proximity to and interaction of learners with external workers during construction and school personnel, including teaching staff. Taking into account contextual factors, GBV/SEA/SH risk has been assessed using the GBV risk tool and is considered to be moderate. Potentially GBV/SEA/SH may happen out of the interaction between learners themselves and between learners and teaching/school personnel. Mitigation measures will include the assessment of and ensuring of existence of child protection measures within ESMPs, such as positive discipline regulations, CoCs, gender-specific infrastructure, awareness raising and sensitization at school level, GMs that are GBV aware/sensitive and ensuring a clear referral pathway/system that identifies violence and thus reduces its impact and continuation as well as provides an effective response mechanism supporting the survivors. In the same regard, for potential GBV/SEA/SH that may arise from the interaction of learners and external workers during construction, mitigation measures will include i. assessment and reflection of GBV risks and mitigation measures in the project ESMPs including as necessary

inclusion of a GBV Action plan with an Accountability and Response Framework as part of project ESMP; ii. Sensitization of local communities about GBV risks, as part of stakeholder consultations; iii. Mapping out GBV prevention and response services in project area of influence; iv. Clearly defining the GBV requirements and expectations in the bid documents, including the requirement for a Code of Conduct (CoC) which addresses GBV; and v. evaluating contractor's GBV response proposal in the C-ESMP, and confirming prior to finalizing the contract the contractor's ability to meet the project's GBV requirements. The project is designed to address inequalities and disparities in learning outcomes by targeting resources to close the gap between the most disadvantaged schools and the others. The project is also designed to enhance school retention and attendance of girls through methods including appointment of girls' counselors, mentors and role models; provision of menstrual health management (MHM) materials and gender-specific infrastructure; and monitoring, counselling and support to vulnerable girls and those at risk of dropout. In addition, and within project design, other vulnerable learners such as those living with disabilities are targeted through ensuring inclusive education facilities and universal access. It is anticipated that civil works will be contained within existing school campuses/premises and it is unlikely that any additional adjacent land would be needed hence no land acquisition processes will be considered. Health and Safety, social exclusion, child protection and GBV/SEA/SH risks and impacts will be considered in the ESMF to be prepared, consulted upon and disclosed prior to appraisal. As the scope and definition of the planned interventions is developed during project preparation these risks will be reassessed and social risk rating may be reconsidered.

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 key risks and impacts from this project arise from the construction of learning shelters, gender specific infrastructure and female teacher houses within or adjacent to existing school campuses. The project will also consider existing latrine capacity and where necessary additional WASH facilities will be constructed in line with appropriate standards. At present numbers of structures, numbers of schools involved, their location or the design of the construction are not known. These will be determined during implementation. It is anticipated that activities will be limited to construction or rehabilitation of one or two structures within each school campus. Given the small scale nature of the proposed activities and the greyfield nature of the expected locations, impacts are expected to be limited and manageable. However to adequately identify impacts it will still be necessary for all subprojects to be appropriately screened for potential environmental and social risks and approaches taken to avoid impacts and mitigate residual impacts. The proposed construction works are anticipated to be generally of small scale and develop a suite of commonly encountered risks and potential impacts including occupational health and safety, community safety, sustainable sourcing of construction materials, creation of solid waste, noise/air pollution and minor congestion due to the use of vehicles and machinery. The fact that these activities will be carried out within existing, operational education campuses does increase risk associated with children being involved in accidents or possible incidents of GBV/SEA/SH. Besides construction related impacts, there could potentially be GBV/SEA/SH risks due to the interaction between learners themselves and between learners and teaching/school personnel as well as possible social exclusion of vulnerable groups such as learners with disabilities.

While existing projects in the sector within Malawi have developed appropriate systems to address these risks and similar approaches are expected to be appropriate in this project, it is expected that risks and impacts will be

assessed and mitigation measures provided within site specific instruments to be prepared during implementation. As the activities will be undertaken within a (as yet unknown but expected) large number of sites across the country it will be necessary to adopt a framework approach and an ESMF prepared to ensure that a process of identifying, assessing, and mitigating environmental and social impacts is integrated in the development of the specific subprojects, with subsequent ESMPs prepared to address specific risks and impacts identified through screening of individual sites during implementation. The approach will likely be that used for MESIP where ESMPs are prepared at a District level and will include generic district information and district-wide mitigation measures together with site specific screening and site-specific mitigation measures. This avoids having a very large number of very repetitive individual ESMPs. The Bank will review and clear the ESMPs as is currently done under MESIP. The ESMF will be consulted on and disclosed prior to Appraisal. Subproject ESMPs will be reviewed, cleared and disclosed prior to commencement of works.

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

None.

ESS10 Stakeholder Engagement and Information Disclosure

To ensure that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context, the borrower will develop and implement a Stakeholder Engagement Plan (SEP). The SEP will be prepared and disclosed as early as possible and before project appraisal. The SEP will include mechanisms for setting out a Grievance Mechanism (GM). Under the current/ongoing MESIP, EQUALS projects, GMs have been set up and are under implementation and working well across the country. The borrower will, therefore, adopt the MESIP GM, that has been set up at school and School Catchment area level, to ensure an accountability platform for interventions under this project. The borrower will strengthen accountability within the GM to empower learners, parents, teachers, other school staff, construction workers and members of the local community to voice complaints, concerns, queries, clarifications and increase awareness about the features of the program and their entitlements as well as establish a continuous feedback between beneficiary communities and implementing structures. The grievance mechanism will also be modified to enable initiation and uptake of GBV/SEA/SH cases.

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

Construction will be conducted by communities in accordance with a standardized design. This is currently under development by Government, adapted from the standardized design for learning shelters used under MESIP. Construction will be done using community artisans but supervised and quality-assured by the Clerk of Works in each district and by the Education Infrastructure Management Unit. Hence, the borrower will apply the relevant provisions of this ESS and EHSG in a manner proportionate to the nature and scope of the operation. All subproject work will be required to ensure risks of child labour, occupational health and safety are appropriately addressed and the requirements of Malawi's labour laws are implemented. The OHS measures set out in the ESMF will also take into account the General Environmental Health and Safety Guidelines. The Borrower will prepare Labor Management Procedures (LMP) which will have detailed information on the community artisans' work terms and conditions including explicit prohibition of child labor. Health and safety of workers, especially women will be assessed in the

Environmental and Social Management Plans in relation to community labor and will be set out in the labour management procedures. The labor management procedure will also specify the manner in which community workers can use the existing GM to raise grievances in relation to the project. The borrower will assess whether there is risk of child labor within the community labor and identify and manage those risks by taking appropriate steps to remedy the situation in consistence with this ESS.

ESS3 Resource Efficiency and Pollution Prevention and Management

Given the nature of the proposed activities it is not expected that the project will cause significant water and energy use, however, the construction and rehabilitation works (albeit small scale) and the associated handling and storage of construction material could does involve the potential for waste production, excessive noise and dust levels. Building materials such as sand and gravel will also have to be obtained from sustainable sources to avoid impacts on natural resources. A key risk comes with the use of burned brisks for learning shelter construction (as a means of cost cutting), which will be completely prohibited. Key resource efficiency and pollution issues will be identified in the ESMF and site specific mitigation approaches developed in the ESMPs.

ESS4 Community Health and Safety

As can be expected, physical works can pose risk to local communities' health and safety. In that regard, the ESMF will outline generic approaches for the project to follow and include requirements for Community Health and Safety including GBV/SEA/SH, HIV Social Mitigation Measures, Traffic/Road Safety Management with measures to ensure safety of nearby communities and road users during construction together with Emergency Response with procedures to respond to accidents and incidents. GBV/SEA/SH risk that make result from construction works inside schools is considered moderate and the ESMF will include measures to prevent and mitigate GBV/SEA/SH during the works. The ESMF will make use of the general and sector-specific EHSGs for the identified subprojects in relation to community health and safety. Construction will be in accordance with a standardized design. This is currently under development by Government, adapted from the standardized design for learning shelters used under MESIP. The updated design is anticipated to be in place prior to Effectiveness. The project should ensure all construction is in compliance with best practice and ensures the safety of school pupils, staff and the local communities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

All rehabilitation and construction will be carried out within the confines of existing school campuses/premises and no new construction of schools is supported through the project. The relevance of this standard will, however, be reassessed as project scope and definition of activities becomes clearer during preparation. In addition, the option of acquiring any required land through leasing from government or voluntary donation by Traditional Authorities is preferred.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Given the expected locations of the construction within existing school campuses or directly adjacent, and that these locations are within town and village boundaries, the risk of impacting natural resources is negligible and this ESS is not considered relevant. The project will have to ensure that building materials such as sand and gravel are from

sustainable sources and not obtained from sources that would impact natural resources or sites with high conservation values. Any potential site specific or building material sourcing impacts are expected to be fully addressed through the development of the ESMF and site-specific ESMPs.

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

This standard is not applicable to Malawi because there are no groups of people who fit the description of people in ESS 7.

ESS8 Cultural Heritage

By the nature of physical works that will be undertaken some of excavation, movement of earth and impounding can be expected. However given the location within existing school campuses within towns and villages the risk of encountering physical and cultural resources is small and this ESS is not considered relevant. Any risks will be addressed through the ESMF which will outline a chance finds procedure and individual site screening as a precursor to the development of site-specific ESMPs.

ESS9 Financial Intermediaries

This standard is not applicable to this operation.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

None at present however donor funds for the Education Program may be comingled in the Education Sector Joint Fund. Although this is not definitive at this time this may be the approach for this project. If this is the case all other donors contributing to the Fund will be made aware and will confirm their agreement that all activities financed out of the funds will comply with the requirements of the World Bank ESF.

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

Actions to be completed prior to Bank Board Approval:

The actions to be completed prior to approval include:

i. Prepare, in consultation with the Bank, a Stakeholder Engagement Plan (SEP) as early as possible and disclose it before appraisal.
ii. Prior to project appraisal, prepare framework documents (ESMF) to guide the preparation of project specific plans at implementation.
iii. Prepare draft Labor Management Procedures (LMP).
iv. Prepare the ESCP outlining material measures and actions to be undertaken over a specified timeframe.

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

The measures and actions to be outlined in the ESCP will include the preparation and implementation of:-
i. Environmental and Social Impact Assessments and/or Environmental and Social Management Plans (that applies a mitigation hierarchy) for all relevant subproject investments (ESMPs expected to be developed at District level) ;
ii. Finalize Labor Management Procedures;
iii. ESF capacity building plan for districts/local governments, schools and communities;

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 30-Sep-2020

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: Republic of Malawi

Implementing Agency(ies)

Implementing Agency: Ministry of Education, Science and Technology

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Salman Asim
Practice Manager (ENR/Social)	Robin Mearns Recommended on 17-Jul-2020 at 18:07:23 EDT
Safeguards Advisor ESSA	Peter Leonard (SAESSA) Cleared on 12-Aug-2020 at 09:56:9 EDT