

104090 REV

SOCIALIST REPUBLIC OF VIETNAM
Vietnam Enhancing Teacher Effectiveness Program

Environmental and Social Systems Assessment

PREPARED BY
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Abbreviations and Acronyms

ADB	Asian Development Bank
BOET	Bureau of Education and Training
CEMA	Centre for Environmental Monitoring and Analysis
CPC	City People's Committee
CPD	Teacher Continuous Professional Development
CTPA	Core Teachers and Principal Advisor
DEP	Department of Environmental Protection
DLIs	Disbursement-linked Indicators
DOET	Department of Education and Training
DONRE	Department of Natural Resources and Environment
DPC	District People's Committee
DTEM	Department of Teacher Education and Management
ECOPs	Environmental Codes of Practice
EHS	Environment, Health, and Safety
EIA	Environmental Impact Assessment
EMPs	Environmental Management Plans
EPP	Environmental Protection Plan
ESSA	Environmental and Social System Assessment
ETEP	Enhancing Teacher Education Program
FCER	Fundamental and Comprehensive Education Reform
FSQL	Fundamental School Quality Level
GDP	Gross Domestic Products
GI	Government Inspectorate
GOV	Government of Vietnam
ICT	Information, Communication and Technology
IT	Information Technology
IVA	Independent Verification Agent
LEP	Law on Environmental Protection
LMS	Learning Management System
LTTU	Lead Teacher Training University
M&E	Monitoring and Evaluation
MOET	Ministry of Education and Training
MOF	Ministry of Finance
MONRE	Ministry of Natural Resources and Environment
MPI	Ministry of Planning and Investment
NIEM	National Institute for Education Management
NTEP	National Teacher Education Program
ODA	Official Development Assistance
OECD	Organization for Economic Cooperation and Development
OM	Operations Manual
PA	Performance Agreement
PAP	Program Action Plan

PforR	Program for Results
PISA	Program for International Student Assessment
PMU	Program Management Unit
PPC	Provincial People's Committee
SBV	State Bank of Vietnam
SEDP	Social Economic Development Plan
SEQAP	School Education Quality Assurance Program
TEIDI	Teacher Education Institution Development Index
TEMIS	Teacher Education Management Information System
TOR	Terms of Reference
TTU	Teacher Training University
UNESCO	United Nations Educational Scientific and Cultural Organization
URENCO	Urban Environment Company
VNEN	Vietnam Escuela Nueva

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EXECUTIVE SUMMARY

1. To inform the preparation of the proposed Enhancing Teacher Education Program for results (ETEP), which will be financed by results-based disbursements, the World Bank conducted an Environmental and Social System Assessment (ESSA) to examine the Program systems for environmental and social management for consistency with the core principles outlined in Bank policy on Program-for-Results Financing.
2. Based on the team's evaluation, the environmental risks of the Program investments are considered Low, and the social risks are considered Moderate. The principal environmental risks stem from potential impacts and risks during the construction and operational phases of the Program. These risks are typical of small-scale civil works and will not pose unprecedented or unusual operational challenges. All environmental impacts can be managed with known mitigation measures, which are within the capacity of counterpart agencies to implement.
3. The principal social risks stem primarily from a concern that some of the new approaches and contents under the Program may be acquired and employed less effectively by teachers from various ethnic minority areas across the country, for various reasons, including cultural, language, and physical barriers. These barriers, if not addressed, may result in unequal education opportunities and outcomes between regions and between social groups. Therefore, it is important to understand any potential risks from the Program that may contribute to or cause some unintentional potential impacts, direct and indirect alike, on the widening gap in education opportunities and outcomes between Kinh-dominant areas and ethnic minority areas. In areas where ethnic minority populations are present, interventions should be designed such that specific cultural and social context and ethnic minorities are taken into consideration. This would ensure that these groups benefit equally from Program.

The National Teacher Education Program

4. The Government of Vietnam gives high priority to improving education quality. In 2013, the 11th Party Congress at its 8th meeting session adopted the Fundamental and Comprehensive Education Reform (FCER), which aims for education to meet “the requirements of industrialization and modernization in the socialist oriented market economy and international integration.” It constitutes a political and legislative umbrella for a broad sector-wide reform. As one objective of the FCER, teachers are required to become increasingly professional, i.e., to adapt methodologies and knowledge to real-time problems as they arise in his or her classroom and school.
5. The Ministry of Education and Training (MOET) has therefore prepared the National Teacher Education Program (NTEP), which will be implemented from 2016 to 2021 to enable the teacher education system to adapt more effectively to the changing needs of teachers to meet learning objectives. The NTEP proposes several paths of intervention: pre-service training for new teachers, retraining for some teachers to obtain additional qualifications, in-service training programs that bring teachers to training centers for specific objectives and continuous professional development (CPD) that provide support and training to teachers within schools.
6. Of these different components, the Bank financed Enhancing Teacher Education Program (ETEP) will support efforts to provide much improved school-based continuous professional development to teachers in classrooms. Relevant research has shown that the

most effective approaches to increasing teacher professionalism consist of: (i) providing school-based support provided directly to teachers in classrooms, – thus “bringing the training to the teachers”; (ii) putting in place rigorous teacher training needs assessment mechanisms that can inform the development and modification of interventions and thus ensure that they truly respond to demand; and (iii) creating opportunities for teachers to access and shape highly pertinent knowledge in an interactive manner.

7. ETEP intends to help the government implement a strategy that connects all teachers in the country through a set of Lead Teacher Training Universities that train and support a cadre of Core Teacher and Principal Advisors who will provide support directly to schools; champion an interactive online teacher knowledge network that connects teachers to peers, researchers, experts in the community, nationally and internationally; and develop and implement needs assessment mechanisms that both record teacher needs and evaluate the effectiveness of different CPD interventions.

8. The very nature of ETEP will increase the value and effectiveness of training and support to teachers and staff who face the most difficult circumstances. ETEP essentially customizes training and support to the context and specific challenges faced by teachers – whether they work with ethnic minorities, disabled children, in remote areas or rapidly urbanizing environments. The assessment systems and knowledge networks will allow all teachers to make their priorities, concerns and needs not only heard but acted upon.

Environmental and Social Effects of the Enhancing Teacher Education Program

Environmental Benefits and Risks

9. Vietnam has environmental assessment requirements that differentiate investment projects by potential impacts. An Environmental Impact Assessment (EIA) is mandatory for work with potential large-scale adverse impacts and an Environmental Protection Plan (EPP) is required for work with more limited impacts. Works requiring an EIA are further divided into those that require central environmental agency review and approval (Ministry of Natural Resources and Environment [MONRE]) and those that are reviewed and approved at the provincial environmental agency (Department of Natural Resources and Environment [DONRE]). All proposed upgrading activities in the Program will require an EPP with delegated review and approval required at the district or city level.

10. Adverse environmental impacts associated with civil works may include noise, dust, vibration, waste generation, and health and safety risks. The potential impacts can be mitigated by proper construction practices and/or Environmental Codes of Practices (ECOPs) under supervision of the responsible agencies and local communities. During operation of upgraded facilities, a certain amount of waste would be generated from daily activities, including solid waste and wastewater. The wastes, especially hazardous waste, can be managed through waste treatment and collection systems under inspection of the responsible agencies in line with government regulations.

11. At the Program level, there are potential risks related to inadequate environmental supervision stemming from insufficient human and financial resources in the Lead Teacher Training Universities (LTTUs) and districts where LTTUs are located, as well as poor environmental management by contractors. The potential adverse effects are generally well known and understood by the implementing authorities. It is expected that upgrading activities effects will be manageable with known and demonstrated mitigation measures.

12. A Program will develop an Operations Manual (OM) that will include guidance to the LTTUs on screening activities to avoid significant impacts, inclusion of ECOPs and Worker's Codes of Conduct as well as communication activities in construction contracts to manage environment, health, and safety (EHS) issues at construction sites. Contractors will also be required to submit copies of their quarry license as a means of controlling EHS issues. Construction supervisors will be contracted on behalf of Program owners to supervise the contractors on both engineering aspects and EHS issues related to construction activities. Program owners and their PMUs are the entities accountable to the government to ensure that all aspects of the investments, including environmental management, follow Vietnamese legislation. While the LTTUs are subject to fines for violations, they can also penalize construction supervisors/contractors for noncompliance of contractual requirements/conditions. Capacity-building activities will also help improve contractor performance relating to compliance with environmental regulations.

Social Benefits and Risks

13. The ETEP would bring crucial benefits to beneficiary principals and teachers. In the consultations, participants confirmed their full support for the concept and approach of the proposed Program, seeing it as a practical and useful way to enhance the effectiveness of teachers from general schools across Vietnam. In particular, the Program would (a) enable Lead Teacher Training Universities to support the provision of high quality and demand-driven continuous professional development to general teachers and managers in their classrooms and schools; (b) develop mechanisms to assess better the need for teachers and principals; (c) establish a cadre of Core Teachers and Principal Advisors who will provide face-to-face continuous professional development at the school level to teachers and principals; and (d) build up an information and communication technology (ICT)-based Learning Management System so that all teachers and principals can have access to quality online professional development courses, shared resources for teaching and learning contributed by specialists and practitioners in education, and peer discussions and/or exchange of ideas.

14. Through enhancing the effectiveness of principals and teachers nationwide, the Program will improve the education outcomes of students across the country, including those from ethnic minorities and other vulnerable groups. The improved education outcomes would create better conditions for ethnic minority young people, increasing their competitiveness in the labor market and thus enabling them to take advantage of business and income opportunities, rather than consigning them to the lower-return sectors of subsistence agriculture, in which most of them are involved at present. The Program will therefore bring about opportunity for poverty reduction and improved living standards among ethnic minority groups, especially those in mountainous and remote regions.

15. Potential adverse social effects and risks under this Program are related to the following:

(a) ***Some new approaches and contents may be acquired and employed less effectively by teachers from various ethnic minority areas.*** This could be for various reasons, including customs, language barriers, social contexts, and limited physical resources. These barriers, if not addressed, may result in unequal education opportunities and outcomes between regions and between social groups;

(b) *Poor IT accessibility in some regions and amongst some target groups.* There is a lack of computer and IT facilities, a lack of computer skills, and limited Internet connection in some mountainous and remote regions; and

(c) *Low motivation to join the Program among some teachers and principals.* A small number of ethnic minority teachers and principals who are 40 years old or above, especially those living in mountainous and remote areas, are not as fluent using ICT applications. They may have lower motivation in applying new technologies in teaching, poor computer skills, and very limited access to computer facilities.

16. As mentioned above, ETEP enables the education system to respond better to these risks by provide multi-dimensional, customizable and highly accountable CPD to all teachers and principals.

17. In general, the government has a robust legal and regulatory framework governing education for vulnerable students, including ethnic minority students, poor students, and students with disabilities. Experience in working with and supporting those vulnerable students is considerable and positive. However, there are some specific weaknesses, including a weak monitoring system with inadequate indicators and data regarding ethnic minority groups. Public disclosure of adequate data on vulnerable groups also needs to be strengthened. Although there are no specific regulations relating to public disclosure on the situation of vulnerable students, in practice some information have been published on the MOET’s official website (www.moet.gov.vn).

18. The government has a good regulatory framework for public participation, especially in relation to engaging with ethnic minorities. However, there is a need to strengthen the implementation of the framework to ensure meaningful participation and consultation with local people, including ethnic minorities. Meaningful consultation with vulnerable groups at every step of the Program implementation, including planning, design, and implementation, would help meet specific needs in their specific social contexts and understand any potential risks from the Program that may contribute to or cause some unintentional potential impacts, direct and indirect alike, on the widening gap in education outcomes between Kinh-dominant areas and ethnic minorities areas. It is important to ensure that, in areas where ethnic minority populations are present, the Program interventions are designed keeping in mind their specific cultural and social context and ethnic minorities are not excluded and can benefit equally from Program benefits.

19. The table below provides an assessment based on five environmental and social systems risk criteria.

Table 1: Summary of Environmental and Social Risks

Risk Criteria	Risk Description	Risk Rating	Key Mitigation Measures
Social impacts	Some new approaches and contents under the Programme may be acquired and employed less effectively by teachers from various ethnic minorities’ areas. Consultations are limited to the preparation stage, with	<i>Moderate</i>	PAP on participation of and consultation with beneficiaries, including those from ethnic minorities groups. <ul style="list-style-type: none"> • Continued consultations during Program implementation to seek

Risk Criteria	Risk Description	Risk Rating	Key Mitigation Measures
	<p>participation of local authorities and education administrators from ministries, provincial departments, universities and schools rather than beneficiary principals teachers, especially those from ethnic minorities and vulnerable groups related as well as ethnic minority areas.</p>		<p>specific and effective measures that are culturally appropriate to ethnic minority beneficiaries involved, so that they can enjoy more inclusive benefits.</p>
<p>Environmental impacts and risks</p>	<p>Civil works may have adverse impacts on the physical environment and communities if mitigation measures are not applied. However, adverse impacts are minor as construction activities are small scale and will take place exclusively within university premises. Inadequate environmental supervision stemming from insufficient human and financial resources in the LTTU may lead to incomplete implementation of environmental protection measures. Construction-related environmental and worker safety issues due to poor construction supervision and low compliance by contractors.</p>	<p>Low</p>	<ul style="list-style-type: none"> • Build environmental management capacity for the LTTUs. • Improve the environmental screening and assessment process. • Improve environmental monitoring and supervision.
<p>Sustainability</p>	<p>Improvements in environmental and social performance/capacity need to be institutionalized to ensure sustainability after the Program ends.</p>	<p>Low</p>	<ul style="list-style-type: none"> • Build capacity in the LTTUs to implement national social and environmental regulations and guidelines.
<p>Institutional capacities/ complexities</p>	<p>The Program is managed by MOET, with LTTUs as implementing agents and DOETs as partners. If there is a lack of adequate coordination between relevant agencies, it may result in approaches which are not properly sensitive to actual needs and customs of the related ethnic minorities and other vulnerable groups during the implementation process.</p> <p>A lack of guidance would limit the capacity and effectiveness of consultation between LTTUs and beneficiary principals and teachers, including those from ethnic minorities groups.</p>	<p>Low</p>	<ul style="list-style-type: none"> • Develop guidelines for key teacher education actors to consult with beneficiary principals and teachers, with focus on ethnic minorities and other vulnerable groups during the implementation process.

Risk Criteria	Risk Description	Risk Rating	Key Mitigation Measures
Reputational and political risks	The existing M&E system to track teacher education does not disaggregate data with import to better teaching of ethnic minorities. This may cause some misunderstanding of the Program among civil society organisations and NGOs.	Moderate	<ul style="list-style-type: none"> • PAP actions on beneficiary participation and consultation during the implementation process; • The Program should consider strengthening the M&E system, including better data regarding teacher education and ethnic minorities and other vulnerable groups.

Main Conclusions and Recommendations

Environmental Recommendations

20. Institutionally, the environmental management function is fully established from the central government to the city/district levels and is capable of managing the environmental aspects associated with the Program. However, a few shortcomings in the performance of the environmental management system have been identified, including (a) weaknesses in environmental screening and assessment; (b) weaknesses in post-EPP monitoring and supervision practices; and (c) challenges in ensuring environmental compliance during the construction phase. Given the small scale and simplicity of proposed upgrading activities, the overall environmental risk is considered Low.

21. From the environmental management perspective, the following measures are recommended:

- (a) To promote institutional sustainability, the environmental management capacity of the LTTUs should be further developed. A capacity-building program, including formal and on-the-job trainings, should be developed and implemented. The environmental training plan should cover all key stakeholders such as the LTTU environmental officers, construction supervisors, and contractor site engineers.
- (b) Improve the environmental screening and assessment process to address the identified weaknesses. Specific information on the environmental screening and assessment process to be used under the Program should be included in the OM. Under the Program, the MOET should review the terms of reference (TOR) for the LTTUs upgrading activities EPPs.
- (c) Improve post-EPP environmental monitoring and supervision. Each LTTU should have the capacity to review draft environmental assessment reports, the mitigation measures incorporated into the engineering designs, construction bidding and contractual documents, and construction supervision contracts.

Recommendation	Time Frame	Responsibilities
(a) Build environmental management capacity	Early stage of the Program	MOET and LTTUs will avail themselves of the appropriate capacity.
(b) Improve environmental screening and	Ongoing	Authorized staff of MOET, LTTU

Recommendation	Time Frame	Responsibilities
assessment process		
© Improve post-EPP environmental monitoring and supervision	Ongoing	Authorized staff of MOET, LTTU, construction supervision consultants

Social Recommendations

22. From a social management perspective, the following measures are recommended:

(a) Early social screening and the participation of the beneficiary principals and teachers, especially those from ethnic minorities and vulnerable groups, should be conducted under the Program to maximize benefits and minimize adverse impacts to them. This would also allow for broader support from beneficiaries, including those from ethnic minorities, for the proposed investments. Measures should be taken to address the major constraints as identified in this assessment, including less effective acquisition and utilization of some new approaches and contents under the Program by teachers and principals from various ethnic minority areas; inadequate consultation and participation of beneficiaries from ethnic minorities and other vulnerable groups in the Program activities; poor IT accessibility in some regions and among some target groups; and low motivation to join the Program among some teachers. Particular attention should be paid to the screening of activities related to teaching in ethnic minority areas and to ethnic minority students. Specific information on social screening processes should be included in the OM.

(b) The Program will enhance the consultation with and participation of beneficiaries, including those from ethnic minority groups, in the Program activities to ensure their meaningful participation and consultation in every step of the Program implementation, including planning, design, and implementation. This should be included as an action in the PAP. Furthermore, the PAP should indicate that the MOET and the participating agencies will jointly develop a guideline to ensure the effective participation of and consultation with principals and teachers, including those from ethnic minorities and vulnerable groups, during the implementation process. Their opinions should be taken into account if they do not contrast with the government regulations. The guidelines, to be implemented by participating institutions, should fully operationalize the existing Vietnamese legislation with respect to ethnic minorities through a process of free, prior, and informed consultations. This should be covenanted in the Financing Agreement.

(c) The abovementioned guidelines will be supplemented with capacity building. A suitable M&E system should be developed to reflect these changes and track the implementation.

(d) The Program should carefully consider the potential social- and environment-related, political and reputational risks when appraising activities.

(e) The Program should ensure that measures are taken to attract qualified ethnic minority teachers and principals to participate and benefit from the program.

(f) It is important to structure teacher training to address questions of ethnic minority education, such as how to teach in a classroom with students who are not fluent

Vietnamese speakers and/or making provisions for particular training to promote teachers who are from ethnic minorities themselves.

(g) The OM should develop guidelines to (i) strengthen implementation of national regulations about information disclosure, consultation and participation, and redress mechanisms within the framework of the Program, including strengthening approaches to consultation and participation with special attention to ethnic minorities people and other vulnerable groups; (ii) boost gender equality and women participation in the Program activities; and (iii) enhance accessibility for people with disabilities in the Program.

(h) During the implementation of the measures described in the section on gender mainstreaming, to promote gender equality in and through teacher education, due attention will be paid to staff and teachers, especially females, who come from ethnic minorities or work in ethnic minority areas as well as teachers with disabilities so that they can enjoy equal opportunities to benefit from the Program activities. These measures, which will be implemented in and through the operation, will ensure that both male and female staff and teachers have equal access to continuous professional development (CPD) opportunities and that timely and adequate gender-specific support to teachers is provided. In particular, to strengthen the monitoring and analysis, it is recommended to inform the gender-disaggregated number of male and female teachers/administrators and to disaggregate by gender at least one of the existing indicators in the Results Framework.

Recommendations	Time Frame	Responsibilities
(a) Improve the transparency and accountability of implementing agencies	Ongoing	MOET, LTTUs
(b) Enhance social screening processes	Ongoing	Authorized and competent MOET, LTTUs staff or consultant
(c) Ensure meaningful participation and consultation, especially ethnic minorities	Ongoing	Authorized and competent MOET, LTTUs staff or consultant
(d) Consider and address the issue of encouragement for teachers and core teachers, especially those from ethnic minority groups and in ethnic minority areas	Ongoing	Authorized and competent MOET, LTTUs staff or consultant
(e) Include guidelines in the OM to better apply laws, implement regulations, boost gender equality, and enable access of people with disabilities		Authorized and competent MOET, LTTUs staff or consultant
(f) Supplement guidelines in the OM with capacity-building measures; M&E system		Authorized and competent MOET, LTTUs staff or consultant
(g) Strengthen grievance redress mechanisms and their implementation	Ongoing	MOET, LTTUs
(h) Consider and address gender-related issues	Ongoing	Authorized and competent MOET, LTTUs staff or consultant

23. As part of the preparation of this ESSA, public consultation workshops were carried out to (a) brief participants on the ESSA approach under the proposed PforR operation; (b) solicit feedback on the key findings and recommendations of the ESSA; and (c) identify possible recommendations to consider for the proposed Program. In general, stakeholders expressed strong support for proposed Program, which they considered would help address the need for infrastructure upgrading of universities. Recommendations by participants

included the design of approaches and materials sensitive to actual needs and cultures and customs of ethnic minority beneficiary groups through careful and continued consultations with them, especially women, during both design and implementation stages, as well as institutional capacity-building activities. This feedback was carefully considered by the team and will be addressed through the Program, where appropriate.

INTRODUCTION

24. Vietnam has recovered strongly since the economic downturn in 2011 with a Gross Domestic Product (GDP) annual growth rate of 6.8 percent as of November 2015.¹ Diminishing inflation, strong export growth, and expansion of foreign exchange reserves have all contributed to a reasonably stable macroeconomic environment. The inflation rate was less than 1.8 percent by the 4th quarter of 2015. Overall export growth from 2011 – 2015 was above 22.8 percent, with high-tech exports growing by a robust 69.4 percent. Rises in the consumer price index dropped down to 0.6 percent year-on-year in August 2015 from 4.3 percent in 2014.

25. Vietnam has achieved three out of the eight Millennium Development Goals: eradicating extreme poverty and hunger, achieving universal primary education, and promoting gender equality and woman empowerment. It is among the pioneers in realizing the Millennium Development Goals and moving forward to the Sustainable Development Goals in the upcoming 2016–2030 period.

26. To help Vietnam become an industrialized country by 2020, the government put education and knowledge at the heart of its socioeconomic development agenda. Vietnam needs to accelerate the development of high-quality human resources with adequate knowledge and technological competence to improve business environment and promote science and technology as the momentum for industry and economic growth. Recognizing this, the 2011-2015 Social Economic Development Strategy (SEDS) states that the “quick development of...high quality human resources is essential for the country’s industrialization, modernization, and the development of a knowledge-based economy.”² In 2013, the 11th Party Congress at its 8th meeting session adopted the Fundamental and Comprehensive Education Reform (FCER),³ which aims for education to meet “the requirements of industrialization and modernization in the socialist oriented market economy and international integration.” It constitutes a political and legislative umbrella for a broad sector-wide reform.

Purpose of the Environmental and Social Systems Assessment

27. The purpose of this ESSA is to:
- (a) Document the environmental and social management procedures, standards, and institutional responsibilities that will apply to the Program;
 - (b) Evaluate the institutional capacity to manage the likely environmental and social effects in accordance with the country’s own requirements under the proposed Program;
 - (c) Assess the consistency of the borrower’s systems with core principles and attributes defined in the Program-for-Results Guidance Note on Environmental and Social Assessment; and
 - (d) Recommend specific actions for improving counterpart capacity during implementation to ensure consistency with the Bank’s principles.

¹ General Statistics Office of Vietnam. 2015 Socio-Economic Statistics.

² Vietnamese Government. 2010. Socio-Economic Development Strategy for 2011-2015

³ Resolution No 29/NQ-TW issued on 4th November 2013 of the 8th Conference of the 11th Session of the Central Executive Committee on Fundamental and Comprehensive Education Reform.

28. Key findings of this assessment will be used to improve environmental and social management outcomes of the Program through specific actions under the overall Program Action Plan, as well as through technical assistance and capacity-building activities to be implemented under the Program. The PAP will be discussed and agreed with the government and its implementation will be assured through a prime ministerial order.

29. The ESSA was prepared in collaboration with relevant officials and technical staff members of government implementing agencies. The methodology included (a) visits to the Lead Teacher Training Universities that will be supported by the Program; (b) review of the country environmental and social management regulations; and (c) a desk review of relevant documentation, including legislation and instruments for supervision, monitoring, and evaluation. A record of consultations with relevant stakeholders and the list of participants are enclosed in annex.

CHAPTER 1: PROGRAM DESCRIPTION

Program Scope

30. The *National Teacher Education Program* (NTEP) establishes a new framework for the provision of training, retraining and continuous professional development to school teachers and principals so that they may build and maintain the professional profile necessary to meet the requirements of the FCER. The Program will be implemented from 2016 to 2021. The NTEP aims to achieve the following objectives by that date:

- For general education and continuing education teachers and management staff:
 - 100 percent of teachers and principals meet qualification requirements pursuant to Amended Law on Education in 2009 and Higher Education Law 2012,
 - 100 percent of teachers and principals are trained and capable of implementing the new curriculum and using the new textbooks;
 - Over 70percent teachers and principals achieve higher levels of the professional standards;
 - Over 80 percent principals are trained and awarded certificates in education management;
- *For teacher training institutions:*
 - 100 percent teacher training institutions update their training programs and curricula, build the capacity of their human resources, improve physical conditions, and restructure to provide high quality training and CPD services;
 - 100 percent teacher training institutions work closely together and with other actors in teacher education, and contribute to shared resources to meet the need for teacher education of all provinces.
- *For education management at all levels:*
 - 100 percent education management authorities at all levels have enhanced planning and management capacity to implement, monitor and evaluate the implementation of teacher education policies; and
 - 100 percent policy and legal documents in teacher training are amended and updated to response to the new context of general education.
- *For schools:*
 - 100 percent schools have enhanced capacity to effectively implement and manage CPD at the school level.

31. NTEP is structured around six “solutions areas”. Each presents a set of strategies grouped by functional category or by type of teacher education.

- *Strengthen teacher education management and planning by* i) updating and further developing the regulatory framework and related policies in support of teacher education; ii) enhancing the capacity of national and local teacher education departments; and iii) establishing a ICT based teacher education information management system;

- Renovate pre-service teacher education by (i) helping teacher training institutions prepare new curricula, training content, delivery mechanisms, support systems for student teachers; (ii) establishing outcome standards for all training programs, (iii) developing assessment tool kits for student-teachers, and (iv) implementing relevant research projects;
- Establish and deliver Continuous Professional Development programs for teachers and school managers by: (i) developing new types of e-learning programs for the delivery of CPD, (ii) training national general education experts who can support efforts to improve CPD, (iii) establishing a cadre of Core Teachers and Principal Advisors at local levels, (iv) providing support programs for Core Teachers and Principal Advisors once deployed to schools; (v) developing materials and support tools for Core Teachers and Principal Advisors to implement CPD at the school level; and (vi) developing more systematic mechanisms to assess the quality and impact of CPD programs;
- Build capacity of key lecturers and managerial staff of teacher training institutions by: (i) providing relevant training programs and courses, (ii) holding national and international conferences and/or workshops; (iii) engaging in scholar and academic exchanges, and (iv) reviewing and renovating regulations on recruitment, work position and other human resource related procedures;
- Enhance physical environment and facilities/equipment of teacher training institutions: (i) upgrading and conducting minor rehabilitation of classrooms, IT centers, teaching practice centers, laboratories, and IT facilities for distance and e-learning at the eight LTTUs, (ii) supporting the development of e-libraries for the eight LTTUs and (ii) enhancing the physical conditions of other teacher training institutions;
- Promote socialization and international cooperation in teacher education by means of workshops, conferences, exchanges and fora.

32. Of the above solution areas, ETEP will focus primarily on efforts to improve Continuous Professional Development provided school-based to teachers and principals. In essence, the enhanced CPD system will provide more training and support that is of high quality, relevant, and timely -- directly to teachers and principals at the school level. Internationally, this is considered best practice for teacher training and support.⁴

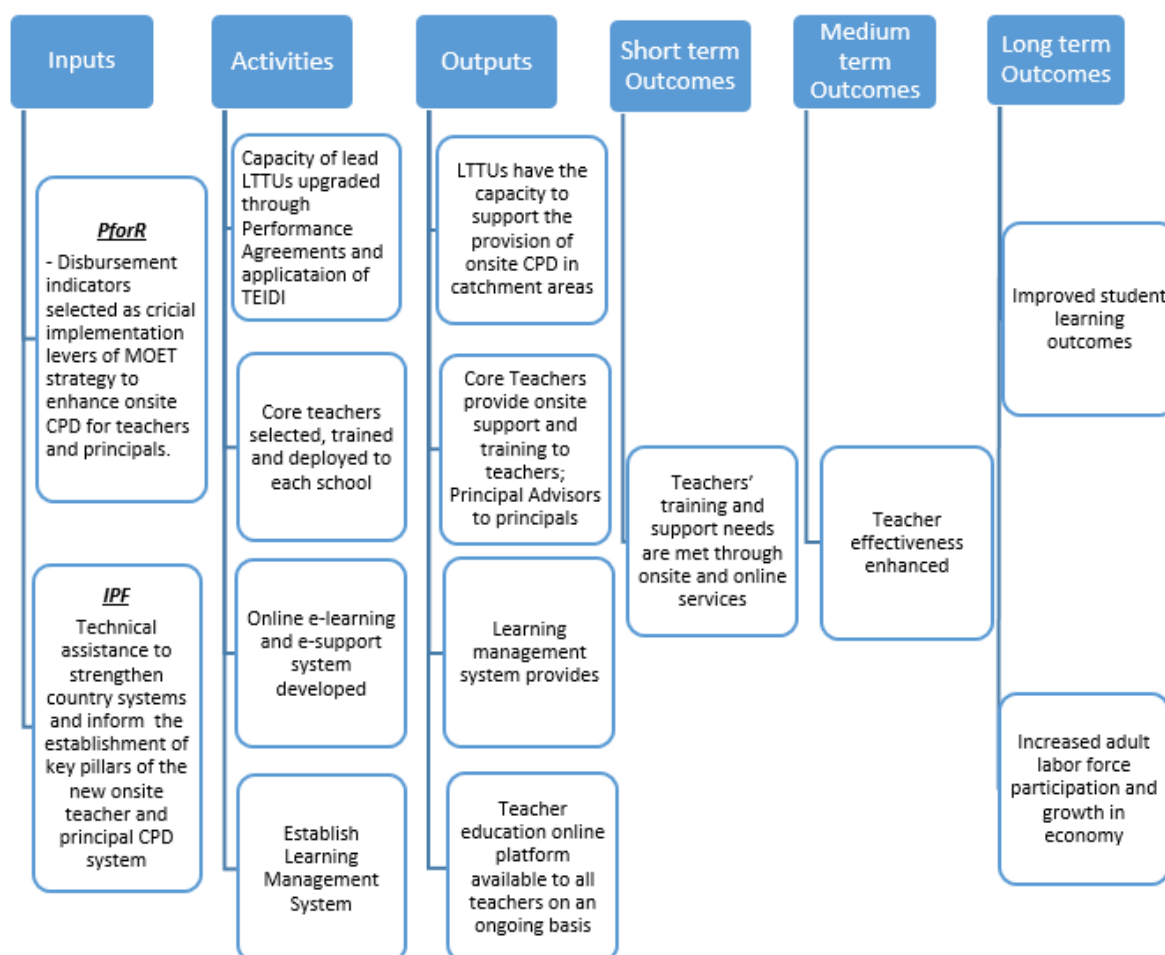
33. The National Teacher Education Program aims to reinforce the provision of CPD through two main vehicles: (i) Core Teachers and Principal Advisors, who will be assigned to schools and school clusters to provide face-to-face training and support and (ii) an online platform that can provide needs-based, interactive training and support directly to teachers and principals. A rigorous training and support needs assessment system, based on professional standards and context-specific needs defined by teachers and principals, will inform the development of tailored training programs and applications. To ensure the dynamism and quality of the enhanced CPD system, eight Lead Teacher Training Universities (LTTUs) in respective catchment areas (corresponding approximately to regions) will train and provide support to Core Teachers and Principal Advisors; develop the online services and applications; and help develop the needs assessment systems. These LTTUs will provide technical leadership and guidance for this school-based CPD system.

⁴ Francesca Caena, 2011. *Quality in Teachers' Continuing Professional Development*. Education and Training 2020: Thematic Working Group 'Professional Development of Teachers', European Commission, Directorate-General for Education and culture.

The Program for Results

34. ETEP will support four results areas based on NTEP. These areas constitute the pillars for establishing an effective and well-functioning CPD system that can provide school-based support and training to teachers and principals in schools.

Figure 1: Results chain for the Enhancing Teacher Education Program



35. **Result Area 1: Improved capacity of Lead Teacher Training Universities and central teacher management units to enhance teacher and principal education effectiveness.** MOET has selected eight Lead Teacher Training Universities (LTTUs)⁵ to provide technical guidance for the development and the implementation of the enhanced CPD for teachers and principals. The LTTUs will train and support Core Teachers, (one selected from each of 28,000 schools countrywide), and Principal Advisors (one selected per seven school principals) who will subsequently return to their respective schools and school clusters to provide CPD to fellow teachers and principals. Second, the LTTUs will help develop instruments that measure the CPD needs of teacher and principals. Third, the LTTUs will develop content for CPD programs that address global teacher and principal needs (e.g., preparing for the rollout of the new curriculum), teacher and principal professional needs

⁵ Hanoi National University of Education, Hanoi Pedagogical University 2, Thai Nguyen University of Education, Department of Teacher Education – Vinh University, Hue University of Education, University of Education – Da Nang University, Ho Chi Minh Pedagogical University, and the National Institute of Education Management

(e.g., programs to help meet new professional standards); and programs that address specific issues or needs identified by teachers and principals. For example, for regions where there is a significant population of ethnic minorities, a LTTU could design programs and delivery methods that target the specific needs of Ethnic Minority teachers who may have less access to the internet or who may be less receptive to peer support.

36. The LTTUs do not currently have the qualities necessary to fully play their role as technical leaders of the school-based CPD system. Consequently, each will prepare a Performance Agreement (PA) to develop their institutional capacity and take on actions that will contribute to meeting DLIs. Each LTTU will conduct a survey to determine Teacher Education Institutional Development Index (TEIDI) scores, which essentially measures the institutional capacity of such establishments (see Box 1). The performance agreement (PA) is a contract signed between the LTTUs, MOET and the Ministry of Finance (MOF) where the universities commit to particular results in order to receive the resources necessary to implement the PAs. Signing and implementing the PA and reporting progress on the TEIDI scores of individual LTTUs are DLIs for the PforR.

37. The Bank-financed Bihar Enhancing Teacher Effectiveness Operation⁶ in India currently uses the TEIDI. TEIDI is a tool to assess the readiness of teacher education institutions to deliver quality teacher education programs and monitor their accountability. The TEIDI will have a quantified and weighted checklist of indicators to measure institutional performance. The TEIDI aims to inform planning for effective decision-making at the national and provincial institutional levels. MOET will adapt the TEIDI to the Vietnam context.

⁶ The Bihar project was approved in May 2015 and is the first PforR in the education sector. It aims to improve the effectiveness of primary school teachers. Teacher training colleges will play a central role in providing support to teachers and thus their capacity is critical. So far, TEIDI has proven to be easy to use and baseline scores were easily established during the first year of the project. The straightforward and relatively “low tech” data collection and analysis systems have contributed to its relatively easy implementation.

Box 1: Framework for Teacher Education Institution Development Index (TEIDI)

TEIDI is a tool to measure LTTU's efficiency and effectiveness in providing high quality teacher training and professional development.

The tool includes indexes used to assess the quality and institutional effectiveness teacher training institutions comprehensively. Each index comprises of relevant indicators and once the data is collected, the TEIDI can be calculated with appropriate weightages.

- **Pedagogy in preservice training programs:** Ensure teachers be trained in organizing learner-centered, activity based and participatory learning experiences;
- **Professional development programs:** Ensure teachers be trained in organizing learner-centered, activity based and participatory learning experiences;
- **Academic staff:** Ensure profile of TTU faculty developed;
- **Activities and direct support with schools:** Ensure TTU practices are not isolated from the classroom practice;
- **ICT preparedness:** Ensure TTUs maximize the use of ICT in providing regular school-based training and support for teachers;
- **Governance, Partnership and Performance:** Ensure institutional organization and governance strengthened.

ETEP will adapt the Teacher Education Institutional Development Index (TEIDI), used in the Bihar project to assess the efficiency and effectiveness of teacher education institutions, for the LTTUs. TEIDI uses a comprehensive approach for the planning, management and governance of teacher education institutions and diagnosing institutional strengths and weaknesses. The index (which will be derived from an aggregation of institutional functioning scores based on some key pre-identified parameters) would help in mapping the progress of each institution through regular flow of information. It will help identify the needs for teacher education provisioning, institutional requirements, pedagogical readiness levels, efficient service delivery mechanism, including sensitivity to the needs of the disadvantaged and minority groups so as to provide CPD and improve teacher performance.

38. **Results Area 2: Development of teacher and principal training needs assessment systems to inform CPD program development.** Teacher Education Management Information System (TEMIS) is part of the online platform dedicated to teacher education. Teachers and principals will record their learning and support needs and their evaluations of online CPD interventions into the TEMIS. It will also house data on the new Teacher Professional Standards that MOET is developing to be better align with the requirements of the FCER.⁷ Teachers and other teacher education actors can use the professional standards and their own self-assessments (and those of other actors, such as the Core Teachers) to identify and prioritize teacher CPD needs. In consequence, the TEMIS would provide an important input for teachers to develop training plans to meet the new professional standards. Furthermore, the TEMIS can easily compile results in different ways to help LTTUs and others prepare specific interventions. The TEMIS will constitute a key resource for CPD

⁷ MOET established teacher professional standards in the 2000s, corresponding to the reform program introduced at that time.

decision-making, program development, and determining the responsiveness and impact of programs. The PforR tracks the development and deployment of the TEMIS to monitor and meet teacher and principal CPD needs as DLIs. The PforR also rewards the practice of sharing data generated from the TEMIS to different stakeholders through annual DLIs.

1. **Result Area 3: School-based and continuous professional development for teachers and principals.** Core Teachers are senior or well-regarded school teachers who will provide face-to-face CPD in the schools where they are deployed (e.g., classroom observation, organization of peer-to-peer training; and individual coaching and mentoring). They will receive special training from the LTTUs and then return to their schools of origin to implement an annual work plan of support and training for other teachers. Similarly, Principal Advisors support principals of a cluster of six or seven schools. The Core Teachers and Principal Advisors will receive support from LTTUs throughout the year. The Core Teachers and Principal Advisors will develop annual plans detailing the training and support services they will carry out over the school year. The training and support provided to the Core Teachers and Principal Advisors by the LTTUs and the implementation of the Core Teachers' and Principal Advisors' annual plans constitute DLIs.

2. Core Teachers and Principal Advisors will not be new categories of civil servants. They retain their status as regular teachers and principals who are given modified work program with the same compensation, benefits, work conditions and responsibilities as before. Cascade trainers have played similar roles (teachers selected to be trainers for a limited period of time), but in an *ad hoc* manner.

3. Teachers have often seen their assignment as cascade trainers to be a sign of status. Becoming Core Teacher and Principal Advisor should also be considered as an appealing opportunity. In addition, Core Teachers and Principal Advisors should have few teaching hours, receive specialized training and CPD programs. It will be nevertheless be necessary to establish a set of regulations for selection, deployment, training requirements, etc. Putting in place the regulatory framework for Core Teachers and Principal Advisors constitute a DLI for the first Period.

4. **Results Area 4: Teachers and principals have access to CPD programs and resources through an Information & Communication Technology-based system.** The MOET aims to put in place a comprehensive Learning Management System that can make available four basic CPD services to teachers and principals: (i) on-demand, interactive e-learning courses for an assortment of continuous professional development needs; (ii) tailored knowledge (e.g., digitized and customizable lesson plans, videos of best practice) personalized support (e.g., help desks); and (iii) opportunities to collaborate with peers and experts online (e.g., A social media platform with mobile interface uniquely designed for teachers) and (iv) mechanisms to allow beneficiaries to evaluate CPD services received.

39. Measures are included throughout the Results Areas to encourage the teacher education system to equip teachers and principals, particularly those who are ethnic minority and female, with the skills, competencies and support necessary to ensure the academic success of ethnic minority children, particularly girls. Some examples of possible initiatives are as follows:

- **Results Area 1:** As part of their institutional capacity building initiatives, LTTUs will acquire the expertise to develop CPD programs, content, delivery methods and assessment systems that help all teachers and principals teach ethnic minority children more effectively. In addition, the LTTUs will conduct research projects, invest in capacity building for educational specialists in ethnic minority issues and prioritize ethnic minority and woman lecturers in their human resource development plans.
- **Results Area 2:** New teacher and principal professional standards will include the mastery of methods and approaches to address culturally sensitive issues, especially those related to teaching ethnic minority children and girls. CPD needs assessment tools and systems will take into consideration the capacity of teachers and principals to work with ethnic minority students and girls. Special care will be taken to evaluate the CPD needs of ethnic minority teachers and principals to inform the development of programs that effectively respond to their professional needs.
- **Results Area 3:** The training and support programs for Core Teachers and Principal Advisors will bolster their capacity to provide CPD to teachers and principals (particularly those who are ethnic minority) that specifically responds to the needs of ethnic minority and female students. The DOETs will be strongly encouraged to select ethnic minority and female teachers and principals to become Core Teachers and Principal Advisors.
- **Results Area 4:** A specific support mechanism will be designed throughout program implementation to ensure that ethnic minority teachers are equipped with adequate computer skills before the commencement of e-learning courses and that they will continued to receive IT supports in not only access to devices but also technical problems during and after e-learning courses.

5. The PforR will also mobilize technical assistance to help develop and operationalize the strategies for improving school-based CPD for teachers and principals. The TA will allow MOET and LTTUs to: (i) elaborate and operationalize policies and directives, (ii) inform and improve the technical quality of the expected results and (iii) reinforce the implementation capacity, including monitoring and evaluation, of the Program. The technical assistance will mobilize expertise in the following areas:

- **Program management capacity and relevant country systems.** These include financial management and environmental management.
- **Expertise in specific technical areas to ensure satisfactory achievement of expected results.** These will include, *inter alia*, developing and implementing effective school-based CPD, innovative CPD programs, IT infrastructure and architecture for the online platform that will host the LMS (Learning and Management System) and TEMIS (Teacher Education Management Information System), professional profile of Core Teachers and Principal Advisors and relevant regulations and selection and appointment procedures, teacher professional standards, training needs assessment methods, and training programs in selected subject areas.
- **Institutional reinforcement of training institutions.** TEIDI will measure the effectiveness of LTTUs to provide quality and relevant services in a timely manner. Similar measures exist in certain OECD countries, but few developing countries. Consequently, the MOET will need to mobilize expertise in this area as well.

- **Third party validation.** The MOET will need to identify an independent entity to undertake performance audits and confirm DLI achievement. Third party studies will provide external validation for key performance data and implementation activities. The MOET may wish to hire a firm or institution with strong educational expertise and country system understanding to provide this service.

6. Selected technical assistance activities have been included in the Program Action Plan to ensure that the most crucial TA is in place when Program becomes effective.

Program Financing

40. The estimated funding envelop for the NTEP is US\$255 million over a period of five years (2017 – 2021). Table 1 shows that this includes a commitment from the Government of Vietnam (GOV) of US\$160 million (63 percent of the total cost) and the ODA source of US\$95 million (or 37 percent of the total cost).

41. There will be a separate account for ETEP funding to monitor the implementation of ETEP – funded activities. Government recurrent and capital expenditures to implement the NTEP will be within the corresponding recurrent and capital envelopes that are approved by the Government and allocated by MOF.

Table 2: Program Costs and Financing

Source	Amount (US\$ m)	% of Total
Government	160	63
Enhancing Teacher Education Program	95	37
Total Program Financing	255	100

Program Development Objective/s (PDO) and key results

42. **The Program Development Objective** of ETEP is: to strengthen teacher education institutions to enhance teacher and principal effectiveness through improved continuous professional development.

The following program key results indicators have been defined:

- **PDO Indicator 1:** Improved performance of the eight Lead Teacher Training Universities to provide CPD, as measured by the Teacher Education Institutional Development Index.
- **PDO Indicator 2:** Number of teachers and principals satisfied with school-based continuous professional development.

43. These PDO indicators will be measured annually and data will be provided from the MOET’s annual progress report on the DLIs, as well as other sources.

Program Beneficiaries

44. The direct beneficiaries of ETEP will include: (i) more than 600,000 teachers and principals, which account for nearly 80 percent of the total number of general education teachers and principals; (ii) 28,000 core teachers and 4,000 principal advisors; (iii) 3,200 lecturers, researchers and staff from the LTTUs; and (iv) MOET staff. Indirect beneficiaries of ETEP will be general education students; pre-service teachers; and Departments of Education and Training (DOETs) and Bureaus of Education and Training (BOETs) staff.

Disbursement Linked Indicators

45. The ETEP DLIs will disburse against the achievement of outputs and outcomes derived from the results chain (see above) and the Results Framework (Annex 2). The disbursement model proposes five DLIs, linked to the four results areas. There will be five annual disbursement periods, thus ensuring a phased approach for the roll-out of the innovations to be introduced through the Program. The DLIs are outlined below, with details presented in Annex 3. DLIs have been prioritized from the indicators described above, based upon their importance for successful implementation and the need to incentivize outputs necessary for the program's success (see Table for details).

Table 3: Results, Disbursement-Linked Indicators and PDO Indicators

Results Area	Disbursement-Linked Indicators ⁸	PDO indicators
Results Area 1: Improved capacity of Lead Teacher Training Universities and central teacher management units to enhance teacher and principal education effectiveness.	DLI 1: Institutional capacity of LTTUs to support the new Continuous Professional Development system for teachers and principals enhanced	PDO 1: Improved performance of the eight Lead Teacher Training Universities (LTTUs) to provide CPD as measured by the Teacher Education Institutional Development Index (TEIDI)
Results Area 2: Development of teacher and principal training needs assessment systems to inform CPD program development.	DLI 2: Systems are in place to: (i) measure whether teachers and principals meet new professional standards; (ii) track and record evaluations of CPD programs; and (iii) record assessments CPD needs of teachers and principals.	
Results Area 3: School-based and continuous professional development for teachers and principals.	DLI 3: Number of Core Teachers and Principal Advisors selected and trained to provide systematic face-to-face school-based CPD to teachers and principals.	
	DLI 4: Number of Core Teachers and Principal Advisors providing school-based continuous professional development to teachers and principals.	

⁸ The way the DLIs are measured is described in the Verification Protocols presented in Annex 3.

Results Area 4: Teachers and principals have access to CPD programs and resources through an Information & Communication Technology-based system.	DLI 5: Number of teachers and principals who are satisfied with ICT-based interactive CPD services provided under the Program.	PDO 2: Number of teachers and principals satisfied with the new school-based continuous professional development.
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Institutional Implementation Arrangements

46. The **MOET** is responsible for the strategic management of the ETEP and, by extension, the improvement of school-based teacher continuous professional development. This includes: (i) issuing and enforcing relevant teacher professional development policies and regulations; (ii) establishing and monitoring new teacher professional standards; (iii) identifying teacher- and school-level demand for school-based CPD; (iv) assessing the effectiveness of CPD interventions; and (v) using assessments and evaluations to shape CPD programs and initiatives. Through its Program Management Unit, MOET will also track and report on ETEP DLIs and transmit requests for disbursements to the World Bank. In addition, the MOET will operate the monitoring and evaluation (M&E) system that will enable the government to report on progress toward achieving the development objective indicators and intermediate indicators of the results framework. MOET will also manage the implementation of the LTTU Performance Agreements.

47. The **DOETs** are the provincial authorities for general education. They are responsible for managing teacher deployment and service within their respective catchment areas, including in-service teacher training and CPD. DOET will coordinate efforts to improve CPD. This will include administrative oversight of Core Teacher and Principal Advisors and ensuring all CPD stakeholders at local level implement the CPD policies. The DOET will also track training needs assessments through the TEMIS, as well as training programs taken by teachers and principals, oversee evaluations of teacher standards, and undertake quality control of the CPD apparatus and process taking a province-wide perspective.

48. The **LTTUs** are responsible for facilitating the improvements to CPD envisaged by the NTEP through training, research, online services, and support to Core Teachers and Principal Advisors, as well other interventions. Successfully accomplishing this mandate will help the MOET meet DLIs. However, the ETEP technical assessment concluded that the LTTUs will need to build their capacity to undertake many of these new responsibilities. Each LTTU will prepare a Performance Agreement to be sign with MOET and MOF. The Performance Agreements will specify the needed institutional, human and technical resources to improve their capacity. The performance agreements will indicate how any given input will help the LTTU meet its new mandate. LTTU-specific TEIDI targets will inform the development of the performance agreement.

49. The LTTUs will: (i) create innovative training content and delivery mechanisms, maximizing the use of ICT solutions; (ii) provide training and support for Core Teachers and Principal Advisors; (iii) coordinate with DOETs in the in assessing teacher training and support needs; and (iv) develop and manage demand-driven knowledge management tools.

50. The network of Teacher Training Institutions (TTI) will soon undergo a major reorganization and rationalization. This Program constitutes a response to the dwindling need for new teachers, the transformation of many into multi-disciplinary universities and colleges,

and the government's decision to close others. The reorganization is also mandated by the FCER and is currently under development. It will take the ETEP and the NTEP as points of departure. Until its finalization and approval, the MOET prefers not to consider them as key actors in the ETEP, although individual LTTUs may decide to collaborate with other TTIs and include relevant actions in their Performance Agreements. The government may use some of the Technical Assistance provided under the Program to support analytical work (policy analysis, strategy development), technical support (planning, feasibility studies) and other technical inputs necessary for developing or implementing a TTI reorganization plan. One eventuality after the reorganization would be that certain TTI could partner with LTTUs, either through the Program Agreements or other mechanisms. Any reorganization of the network of TTIs would need to be closely coordination with the DOETs and the MOET.

51. The **MOF**, through the **State Bank of Vietnam (SBV)**, will receive the funds disbursed by the World Bank as per the terms of the IDA credit financing agreement. It will be responsible for making the appropriate resources available to the relevant institutions (e.g., the MOET and the LTTUs through their Performance Agreements) so that LTTUs can undertake key interventions necessary for meeting the DLIs in a timely, efficient and effective manner.

52. **Independent Verification Agency**⁹ will provide independent confirmations of the results reported by LTTUs and the MOET. The MOET will select an IVA within six months of Program effectiveness as indicated in the Program Action Plan.

⁹ No agency has been selected yet to verify ETEP results using protocols agreed with the Bank.

CHAPTER 2: PROGRAM ENVIRONMENTAL MANAGEMENT SYSTEM

I. Environmental Context

53. The Law on Environmental Protection (LEP) 2014 is officially effective as of January 1, 2015. Decree 18 and circular 27 on strategic environmental assessment, environmental impact assessment, and environmental protection plan are effective as of February and May 2015, respectively.

54. The Lead Teacher Training Universities are located in urban settings and border on residential areas. The Vinh, Hue, and Da Nang TTUs are located in central provinces. Ho Chi Minh Education University is located in the south. The Hanoi 1&2 and Thai Nguyen TTUs and the NIEM are located in the north. Every year, the central provinces are often affected by several storms. Some areas of Ho Chi Minh City are often flooded due to tide.

55. The waste management system in the LTTUs meets national environmental protection requirements. The LTTUs have sewerage systems connecting to the municipal wastewater system. Solid waste is daily separated into non-hazardous and hazardous wastes and an Urban Environment Company (URENCO) is contracted to collect and treat the solid waste. Domestic wastewater is preliminarily treated through septic tanks and then discharged into the municipal wastewater system. The LTTUs are provided with clean water supply and electricity from urban water and electricity supply systems.

56. The LTTUs comply with health and safety regulations. Staff health examination is carried out periodically. Safety regulations are disseminated to every staff and on-the-job training in safety is provided to staff annually.

II. Potential Environmental Effects

57. The Program would support small-scale upgrading activities of the existing education facilities within university premises. Thus, the potential adverse environmental impacts of this Program are assessed to be insignificant. These adverse impacts are minor, temporary, and localized.

58. **Impacts associated with construction activities.** Adverse environmental impacts associated with civil works may include noise, dust, vibration, waste generation, and health and safety risks. The potential impacts will be mitigated by proper construction practices and/or ECOPs under supervision of the responsible agencies and local communities.

59. **Impacts associated with operation of facilities.** During operation of upgraded facilities, a certain amount of waste would be generated from daily activities, including solid waste and wastewater. The wastes, especially hazardous waste, will be managed through waste treatment and collection systems under inspection of the responsible agencies in line with the government regulations.

60. **Occupational health and safety.** During operation of upgraded facilities, occupational health and safety issues will be considered under the Program; measures to protect staff from health and safety risks should be taken, including through awareness raising activities and health care system in line with Law on Labor 2012 and Law on Health Insurance 2014.

III. Environmental Management Systems

A. Institutional Responsibilities

Central Level

61. The MONRE is the environmental management authority at the central level in Vietnam. As part of its management function, the MONRE appraises and approves environmental reports and carries out post-EIA monitoring.

62. According to LEP 2014, the sectoral ministries are responsible for the environmental management of activities within their sectors. Under the ETEP, while the preparation of investments is the responsibility of universities, the operation of the facilities provided will be managed by the relevant universities.

63. Regarding occupational health and safety, agencies from various levels of the Ministry of Labor, War Invalids, and Social provide guidance and carry out periodical inspections.

Province Level

64. The DONREs are the provincial environmental management agencies. The DONREs are responsible for environmental management, land acquisition and compensation, mineral resources management, hydrometeorology, and mapping. The DONREs support the Provincial People's Committees (PPCs) on environmental management in accordance with the LEP and related laws and regulations. The DONREs are technically managed and supported by the MONRE.

65. The key environmental administration roles of the DONREs are to

- (a) Provide technical guidance to relevant entities in the province regarding environmental management;
- (b) Appraise and approve EIAs in accordance with the regulations specified in Annexes II and III of Decree No. 18/2015/ND-CP and guide the implementation of Environmental Management Plans (EMPs);
- (c) Appraise and approve EPPs in accordance with Item 1, **Article** 32 of LEP 2014;
- (d) Conduct periodical assessment of environmental status in the province, identify the areas being polluted and prepare the lists of main polluters, and inspect the implementation of corrective measures;
- (e) Coordinate the implementation of corrective actions in case there are large-scale failures and extend or withdraw licenses on water resource usage and discharge;
- (f) Issue mining and waste disposal licenses and monitor and inspect mining activities;
- (g) Coordinate the implementation of environmental protection and improvement projects; and
- (h) Carry out communication campaigns on environmental awareness.

66. Under the DONRE, there are three sub-departments including the Department of Environmental Protection (DEP), the Centre for Environmental Monitoring and Analysis

(CEMA), and the Environmental Fund. The DEP plays an environmental management role, CEMA is responsible for environmental quality monitoring, and the Environmental Fund covers environmental investments. The EIA appraisal and post-EIA monitoring functions rest with the DEP.

67. Given the simplicity and small scale of upgrading activities proposed under the Program, environmental assessments are not subject to the DONRE's review and approval.

District Level and City Level under Province

68. At the district level and city level under the province, there is an Environmental Division responsible for environmental management. There are two to three staff in each Environmental Division, and their key functions relevant to the ETEP include the following:

- (a) Verify and certify EPPs of projects and monitor implementation.
- (b) Carry out inspections and facilitate the process of addressing environmental complaints.
- (c) Carry out environmental awareness raising activities.
- (d) Provide environmental technical guidance to environmental officers at commune and ward levels.

B. Legal and Regulatory Framework Applicable to Program

69. LEP 2014 provides the overall and fundamental legal framework for environmental regulation in Vietnam. The LEP regulates environmental protection activities, policies, measures, and resources for protection of the environment; general powers of the central and local governments with respect to the protection of the environment; and the rights and obligations of organizations, family households, and individuals with respect to protection of the environment. The LEP provides the central government with the authority to set standards for emissions or discharges of environmental pollutants as defined in the law.

70. LEP 2014 stipulates environmental assessment policies and procedures that include the requirements for public participation; consideration of environmental management and monitoring actions; clear roles of government agencies in EIA enforcement and monitoring; a prescriptive approach to screening/scoping of EIA documents; clear requirements for smaller projects that are not subject to a full EIA process; the roles of government agencies in EIA review and appraisal; and transfer of responsibility to provinces and sector ministries for EIA approval. The LEP is currently under revision and includes efforts to strengthen EIA monitoring and enforcement.

71. **EIAs.** The Constitution (**Articles 29 and 31**) and various laws, including LEP 2014, provide for avoidance, minimization, and mitigation of adverse impacts; promotion of environmental sustainability; and promotion of informed decision making in environmental protection. Under the LEP, an EIA is mandatory for projects with large-scale adverse impacts (**Article 18**, LEP 2014) and an EPP is required for projects with more limited impacts such as household-based production, business or service establishments, and entities not defined in **Articles 13 and 18** of LEP 2014.

72. The environmental assessment regulations and procedures are detailed by the following Decree and Circular, including:

- (a) Decree 18/2015/ND-CP, which provides detailed regulations on the scope and planning process for the preparation, appraisal, approval, and implementation of environmental assessment instruments; and
- (b) Circular 27/2015/TT-BTNMT, which prescribes the required structure and content of the environmental safeguards documents.

73. As required by LEP 2014, project owners prepare an EIA or EPP and submit it to the environmental management authority at the appropriate level for review and approval before the project is implemented. Annex II of Decree No. 18/2015/ND-CP provides the lists of projects and Programs requiring approval. Annex III of Decree 18/2015/ND-CP also specifies the types of projects that require EIA be appraised by the MONRE, including:

- (a) Projects using part of an environmentally sensitive area such as a national park, nature reserve, cultural heritage site, protected landscape, or biosphere;
- (b) Projects that will lead to conversion of watershed protection forests and wind/wave protection forests;
- (c) Projects for which the investment decision is made by the National Assembly and some types of industrial projects; and
- (d) Projects that cover two or more provinces (for example, one road running through two provinces).

74. Project EIAs not requiring appraisal by the MONRE are reviewed and appraised by the DONRE. EIAs listed in Annex III of Decree No. 18/2015/ND-CP will be appraised and approved by the MONRE. Those not listed in Annex III will be subjected to the DONRE's review and approval. For projects with features under the thresholds specified in Annex II, EPPs are required. The EPP prepared for projects defined in Item 1, **Article 32** of LEP 2014 is reviewed by the PPC while the EPP prepared for projects defined in Item 2, **Article 32** of LEP 2015 is reviewed by the District People's Committee (DPC).

C. Environmental Review of Upgrading Activities under the ETEP

75. Upgrading activities supported under the Program would cause adverse environmental impacts associated with civil works, such as generation of noise, dust, vibration, wastes, and health and safety risks. However, upgrading activities would take place exclusively within university premises, so potential negative impacts are insignificant, transitory and manageable. The potential impacts will be mitigated by proper construction practices and/or environmental codes of practices under supervision of the responsible agencies and local communities. During operation of upgraded facilities, a small amount of wastes would be generated from daily activities of teachers, students and staff of LTTUs, including solid waste and wastewater. The wastes will be managed through the existing waste treatment and collection facilities under inspection of the responsible agencies in line with the government regulations.

76. All proposed upgrading activities under the Program will only require EPPs, given the simplicity and small scale of civil works. According to **Article 31** of LEP 2014, the project owner must prepare an EPP and submit it to the responsible agency for appraisal and approval before implementing the project. Within 10 days from receipt of the EPP report, responsible agencies defined in Items 1 and 2, **Article 32** of LEP 2014 must issue certification for the EPP. In case these

agencies do not issue certification for the EPP, the agencies must respond to the project owner in writing and provide clear reasons.

77. Gaps in environmental assessment requirements between Vietnamese legislation and donor requirements has been identified by comprehensive Bank and ADB studies carried out in 2007.¹⁰ Many of these gaps, particularly the scope of environmental assessments, the content of environmental management plans, and consultation requirements have been addressed in Decree 18/2015/ND-CP dated February 14, 2015 and Circular No. 27/2015/TT-BTNMT dated May 29, 2015 (supported and commented on by both the Bank and ADB). A review to compare key environmental Bank safeguards policies and Vietnamese regulations can be found in Annex 3. Some other gaps, such as environmental management frameworks for projects in which the locations of subprojects are unidentified at project preparation, have still not been addressed through LEP 2014.

Post EIA/EPP Implementation and Monitoring

78. The project owner is responsible for implementation of environmental protection measures as indicated in the certified EPP in accordance with **Article 33** of LEP 2014. The agency issuing certification for EPP is responsible for (a) inspection of implementation of environmental protection measures indicated in the certified EPP, (b) receipt and addressing the project owner’s recommendations of environmental protection, and (c) coordination with the project owner to deal with environmental problems arising during project implementation in accordance with **Article 34** of LEP 2014.

Table 4: PMU Environmental Management Requirements

Project Phase	Environmental Management Activity	Responsibility
Feasibility study	<ul style="list-style-type: none"> EPP to be prepared Decree No. 18/2015/ND-CP guiding the implementation of LEP 2014 	Feasibility study consultant
Bidding documents	<ul style="list-style-type: none"> Environmental clauses included in bidding documents Article 25 of the law on bidding refers to bid evaluation criteria for shopping contracts, which includes environmental impacts and mitigation measures Article 33 applicable to civil works contracts: Bid evaluation based on environmental sanitation commitments, fire prevention and protection, and occupational safety Incorporation of mitigation measures into engineering design depends on environmental capability of the engineering design consultants and the PMU’s control 	Engineering design consultants
Construction supervision team	<ul style="list-style-type: none"> Have some knowledge on environment and safety, but need to be trained and monitored closely by the PMU 	Independent consultant needed
Contractors	<ul style="list-style-type: none"> Responsible for complying with environmental obligations of contracts Generally awareness is low, workers are familiar with small job size, and do not have the habit of following work safety rules 	Contractors
Benefited/affected	<ul style="list-style-type: none"> Play active roles in monitoring contractors’ 	Local communities

¹⁰Harmonization of EIA for the Hanoi Core Statement on Aid Effectiveness, 2007. The study has been updated during 2009–2011 with three main activities: assist the GOV to revise Decree 08/2006/ND-CP on EIA, develop EIA guidelines, and develop EIA capacity. Decree 29/2011/ND-CP and Circular 26/2011/TT-BTNMT were developed as part of this study supported by the Bank/ADB in collaboration with the GOV/MPI/MONRE.

Project Phase	Environmental Management Activity	Responsibility
communities	performance, including environmental compliance	

D. Review of Other Relevant Laws and Decrees

79. **The Law on Natural Disaster Preparedness and Response** promulgated in June 2013 establishes fundamental principles relating to disaster preparedness and response, which include proactive prevention and timely response as well as prompt and efficient recovery. **Article 4** specifies that disaster preparedness and response should combine construction and non-construction solutions, environment and ecosystem protection, and climate change adaptation.

80. **Article 19** specifies disaster prevention requirements for urban/rural residential areas and technical infrastructure works. Investors are required to ensure disaster prevention requirements are incorporated into proposed project preparation, including the following: (a) not causing an increase in disaster risks, restricting to a minimum the risk of disasters, and ensuring the stability of the building in case of disaster and (b) complying with the provisions of the law on environmental protection, construction, and urban planning. This article also requires the competent authority to perform a project assessment to ensure that proposed projects meet disaster prevention requirements.

81. With participating PMUs located in the LTTUs that are subjected to annual disasters such as storms and flooding, it is very important that these guiding principles be strictly followed during the planning and implementation of the proposed Program.

82. **The revised Law on Water Resources** was promulgated in 2012, replacing some articles of the old Water Resources Law issued in 1992. While this law is more focused on water resource planning, management, and the effective use of water resources, there are some articles closely related to the environmental assessment process as described here:

- **Article 9** provides a list of the prohibited activities that would cause pollution/degradation of water resources of various types. Particularly, this article specifies that discharge of both untreated domestic wastewater (or treated wastewater that does not meet the standard) into water sources is prohibited.
- **Article 27** states that entities that may cause water pollution are required to prepare and implement plans to prevent, minimize, and clean up pollution. Under the Program, small amounts of wastewater generated from construction sites should be managed through ECOPs and Workers' Codes of Conducts to be included in bidding documents and construction contracts.
- **Article 5** regulates that ministerial agencies including the People's Committees at various levels have the responsibility to coordinate with the mass media and educational organizations to conduct training and communication activities to raise awareness and promote the participation of people in the protection of water resources and the effective usage of water, and so on. During the consultations with the DONREs and provincial mass organizations such as Women's Unions and the Father Front, and so on, it was confirmed that environmental communication campaigns that include water-related topics have been conducted regularly in all participating provinces. This would be an advantage for promoting community participation in environmental monitoring of the Program as a certain level of awareness already exists.

- **Article 44** provides the list of cases where a license for exploitation and usage of water resources is not required, including small-scale exploitation and usage of water sources. As water use for construction activities under the proposed Program will be at a very small scale, no license will be required.

Decree No. 59/2007/ND-CP dated April 9, 2007 of the Government on Solid Waste Management

83. The first three principles stated in **Article 4** of this decree will be applicable under the proposed Program: (a) Organizations and individuals that discharge solid waste or are engaged in activities that generate solid waste shall pay charges for the collection, transportation, and disposal of solid waste; (b) Waste shall be separated at source of generation and then recycled, reused, and processed to have its useful constituents recovered for use as input materials and to generate energy; (c) Prioritize the application of technologies for the processing of hard-to-decompose solid waste which may help reduce the volume of waste to be buried, so as to save land used for this purpose.

84. The proposed Program should also follow the requirements detailed in some items of **Article 24**: “on the main streets, in business centers and in public and residential areas, facilities for storage of solid wastes must be arranged” (item 3); “the volumes of waste bins within a building must suit detention time. Bins placed in public places must meet technical and aesthetical requirements” (item 4); and “solid waste must not be kept on-site for more than two days” (item 5).

IV. Mitigation Measures to Reduce Environmental Impacts and Risks

85. Mitigation measures are readily available for mitigating the potential negative impacts and risks presented in the following ECOPs and Worker Codes of Conduct. In addition, the Bank/International Finance Corporation Guidelines on Environmental, Health, and Safety would be followed. Inclusion of environmental requirements into bidding documents and construction contracts is compulsory under the Bidding Law of Vietnam.

Table 5: Environmental Codes of Practice

Issues/Risks	Mitigation Measures
Dust generation	<ul style="list-style-type: none"> • The contractor is responsible for compliance with relevant Vietnamese legislation with respect to ambient air quality. • The contractor shall ensure that the generation of dust is minimized and is not perceived as a nuisance by local residents and shall implement a dust control Program to maintain a safe working environment and minimize disturbances for surrounding residential areas/dwellings. • The contractor shall implement dust suppression measures (for example, use water spraying vehicles to water roads, covering of material stockpiles, and so on) as required. • Material loads shall be suitably covered and secured during transportation to prevent the scattering of soil, sand, materials, or dust. • Exposed soil and material stockpiles shall be protected against wind erosion and the location of stockpiles shall take into consideration the prevailing wind directions and locations of sensitive receptors.
Air pollution	<ul style="list-style-type: none"> • All vehicles must comply with Vietnamese regulations controlling allowable emission limits of exhaust gases. • Vehicles in Vietnam must undergo a regular emissions check and be certified, namely ‘Certificate of conformity from inspection of quality, technical safety and environmental protection’ following Decision No. 35/2005/QD-BGTVT.

Issues/Risks	Mitigation Measures
Impacts from noise and vibration	<ul style="list-style-type: none"> • There should be no burning of waste or materials on site. • The contractor is responsible for compliance with the relevant Vietnamese legislation with respect to noise and vibration. • All vehicles must have appropriate ‘Certificate of conformity from inspection of quality, technical safety and environmental protection’ following Decision No. 35/2005/QĐ-BGTVT, to avoid exceeding noise emission from poorly maintained machines. • When needed, measures to reduce noise to acceptable levels must be implemented and could include silencers, mufflers, acoustically dampened panels, or placement of noisy machines in acoustically protected areas.
Water pollution	<ul style="list-style-type: none"> • The contractor must be responsible for compliance with the relevant Vietnamese legislation relevant to wastewater discharges into watercourses. • Portable or constructed toilets must be provided on site for construction workers. Wastewater from toilets as well as kitchens, showers, sinks, and so on shall be discharged into a conservancy tank for removal from the site or discharged into municipal sewerage systems; there should be no direct discharges to any water body. • Wastewater over permissible values set by relevant Vietnam technical standards/regulations must be collected in a conservancy tank and removed from the site by licensed waste collectors. • Before construction, all necessary wastewater disposal permits/licenses and/or wastewater disposal contract should have been obtained. • At completion of construction works, water collection tanks and septic tanks shall be covered and effectively sealed off.
Drainage and sedimentation control	<ul style="list-style-type: none"> • The contractor shall follow the detailed drainage design included in the construction plans, intended to prevent storm water from causing local flooding or scouring slopes and areas of unprotected soil resulting in heavy sediment loads affecting local watercourses. • Ensure drainage system is always maintained cleared of mud and other obstructions. • Areas of the site not disturbed by construction activities shall be maintained in their existing conditions. • Earthworks, cuts, and fill slopes shall be properly maintained, in accordance with the construction specifications, including measures such as installation of drains, use of plant cover. • To avoid sediment-laded runoff that could adversely affect watercourses, install sediment control structures where needed to slow or redirect runoff and trap sediment until vegetation is established. Sediment control structures could include windrows of logging slash, rock berms, sediment catchment basins, straw bales, storm drain inlet protection systems, or brush fences. • Site dewatering and water diversions: In case the construction activities require that work be carried out within the watercourse (for example, culvert or bridge crossing construction, retaining wall construction, erosion protection works), the work area must be dewatered to provide for construction in dry conditions. The sediment-laden water pumped from the work area must be discharged to an appropriate sediment control measure for treatment before re-release to the stream. • Stream diversions or construction of cofferdams would require site-specific mitigation measures in the EMP.
Management of stockpiles, quarries, and borrow pits	<ul style="list-style-type: none"> • Large-scale borrow pits or stockpiles will need site-specific measures that go beyond those in these ECOPs. • All locations to be used must be previously identified in the approved construction specifications. Sensitive sites such as scenic spots, areas of natural habitat, areas near sensitive receptors, or areas near water should be avoided. • An open ditch shall be built around the stockpile site to intercept wastewater. • Stockpile topsoil when first opening a borrow pit and use it later to restore the area to near natural conditions. • If needed, disposal sites shall include a retaining wall. • If the need for new sites arises during construction, they must be preapproved by the construction engineer.

Issues/Risks	Mitigation Measures
	<ul style="list-style-type: none"> • If landowners are affected by use of their areas for stockpiles or borrow pits, they must be included in the project resettlement plan. • If access roads are needed, they should have been considered in the environmental assessment.
Solid waste	<ul style="list-style-type: none"> • Before construction, a solid waste control procedure (storage, provision of bins, site clean-up schedule, bin clean-out schedule, and so on) must be prepared by contractors and it must be carefully followed during construction activities. • Before construction, all necessary waste disposal permits or licenses must be obtained. • Measures shall be taken to reduce the potential for litter and negligent behavior with regard to the disposal of all refuse. At all places of work, the contractor shall provide litter bins, containers, and refuse collection facilities. • Solid waste may be temporarily stored on site in a designated area approved by the construction supervision consultant and relevant local authorities before collection and disposal through a licensed waste collector, for example, Urban Environment Company (URENCO). • Waste storage containers shall be covered, tip proof, weatherproof and scavenger proof. • No burning, on-site burying, or dumping of solid waste shall occur. • Recyclable materials such as wooden plates for trench works, steel, scaffolding material, site holding, packaging material, and so on shall be collected and separated onsite from other waste sources for reuse, for use as fill, or for sale. • If not removed off site, solid waste or construction debris shall be disposed of only at sites identified and approved by the construction supervision consultant and included in the solid waste plan. Under no circumstances shall the contractor dispose of any material in environmentally sensitive areas, such as in areas of natural habitat or in watercourses.
Chemical or hazardous wastes	<ul style="list-style-type: none"> • Chemical waste of any kind shall be disposed of at an approved appropriate landfill site and in accordance with local legislative requirements. The contractor shall obtain needed disposal certificates. • The removal of asbestos-containing materials or other toxic substances shall be performed and disposed of by specially trained and certified workers. • Used oil and grease shall be removed from the site and sold to an approved used oil recycling company. • Used oil, lubricants, cleaning materials, and so on from the maintenance of vehicles and machinery shall be collected in holding tanks and removed from site by a specialized oil recycling company for disposal at an approved hazardous waste site. • Used oil or oil-contaminated materials that could potentially contain PCBs (Polychlorinated Biphenyls) shall be securely stored to avoid any leakage or affecting workers. The local DONRE must be contacted for further guidance. • Unused or rejected tar or bituminous products shall be returned to the supplier's production plant. • Relevant agencies shall be promptly informed of any accidental spill or incident. • Store chemicals appropriately and with appropriate labelling. • Appropriate communication and training Programs should be put in place to prepare workers to recognize and respond to workplace chemical hazards. • Prepare and initiate a remedial action following any spill or incident. In this case, the contractor shall provide a report explaining the reasons for the spill or incident, remedial action taken, consequences/damage from the spill, and proposed corrective actions.
Management of small amounts of sludge	<ul style="list-style-type: none"> • Dredging plan should be established, including time schedule and method statement to meet the requirements of traffic safety, public health, and environmental sanitation. To ensure dredging that is consistent with environmental regulations, key decision makers (local authority, the DONRE, utility company, construction supervision consultant, and so on) must be involved and concur on each key decision point in the process leading to preparation and implementation of a plan. • Characteristics of sludge/sediment should be determined by sampling and analysis if

Issues/Risks	Mitigation Measures
	<p>not already fully evaluated during the EIA. Sludge that is heavily contaminated would require measures that go beyond the scope of these ECOPs.</p> <ul style="list-style-type: none"> • Ensure that dredged material management plans incorporate environmental considerations in the identification of short-term and long-term disposal alternatives, consider methods to reduce dredging, and maximize the beneficial use of dredged materials. • Dredging work should be conducted when water flow is high to allow the dredged materials to be separated into the sediment and the supernatant water (that is, spoil) by settling. • Lixivate from dredged materials should not be allowed to enter watercourses without appropriate filtering or treatment. • Collected dredged materials have to be processed according to Vietnamese regulations on waste collection, to ensure safe and environmentally secure transportation, storage, treatment, and management. • Those involved in handling of sludge should be specialized and have certification in sludge handling. Guidelines for certification in sludge handling is in Circular No. 12/2011/TT-BTNMT on management of hazardous substances. • Sanitary landfill site should meet technical requirements, based on level of potential contamination.
Vegetation cover management	<ul style="list-style-type: none"> • The contractor shall prepare a Clearance, Revegetation, and Restoration Management Plan for prior approval by the construction engineer, following relevant regulations. The Clearance Plan shall be approved by the construction supervision consultant and followed strictly by the contractor. Areas to be cleared should be minimized as much as possible. • The contractor shall remove topsoil from all areas where topsoil will be affected by rehabilitation activities, including temporary activities such as storage and stockpiling; the stripped topsoil shall be stockpiled in areas agreed with the construction supervision consultant for later use in revegetation and shall be adequately protected. • The application of chemicals for vegetation clearing is not permitted. • Prohibit cutting of any tree unless explicitly authorized in the vegetation clearing plan. • When needed, erect temporary protective fencing to efficiently protect the preserved trees before commencement of any works within the site. • No area of potential importance as an ecological resource should be disturbed unless there is prior authorization from the CMS (Construction Management Supervisor). This could include areas of breeding or feeding of birds or animals, fish spawning areas, or any area that is protected as a green space. • The contractor shall ensure that no hunting, trap shooting, or poisoning of fauna takes place.
Traffic management	<ul style="list-style-type: none"> • Before construction, carry out consultations with local government and community and with traffic police. • Significant increases in number of vehicle trips must be covered in a construction plan that is previously approved. Routing, especially of heavy vehicles, needs to take into account sensitive sites such as schools, hospitals, and markets. • Installation of lighting at night must be done if this is necessary to ensure safe traffic circulation. • Place signs around the construction areas to facilitate traffic movement, provide directions to various components of the works, and provide safety advice and warning. • Employing safe traffic control measures, including road/rivers/canal signs and flag persons to warn of dangerous conditions. • Avoid material transportation for construction during rush hour. • Passageways for pedestrians and vehicles within and outside construction areas should be segregated and provide for easy, safe, and appropriate access. Signposts shall be installed appropriately in both waterways and roads, where necessary.
Restoration of affected areas	<ul style="list-style-type: none"> • Cleared areas such as borrow pits no longer in use, disposal areas, site facilities,

Issues/Risks	Mitigation Measures
	<p>workers' camps, stockpile areas, working platforms, and any areas temporarily occupied during construction of the project works shall be restored using landscaping, adequate drainage, and revegetation.</p> <ul style="list-style-type: none"> • Start revegetation at the earliest opportunity. Appropriate local native species of vegetation shall be selected for the planting and restoration of the natural landforms. • Spoil heaps and excavated slopes shall be re-profiled to stable batters and grassed to prevent erosion. • All affected areas shall be landscaped and any necessary remedial works shall be undertaken without delay, including greenspaces, roads, bridges, and other existing works. • Trees shall be planted on exposed land and slopes to prevent or reduce land collapse and keep stability of slopes. • Soil contaminated with chemicals or hazardous substances shall be removed and transported and buried in waste disposal areas. • Restore all damaged road and bridges caused by project activities.
Worker and public safety	<ul style="list-style-type: none"> • Contractor shall comply with all Vietnamese regulations regarding worker safety. • Prepare and implement action plan to cope with risk and emergency. • Prepare emergency aid service at construction site. • Train workers on occupational safety regulations. • If blasting is to be used, additional mitigation measures and safety precautions must be outlined in the EMP. • Ensure that ear pieces are provided to and used by workers who must use noisy machines, such as piling, explosion, and mixing, for noise control and workers' protection. • During demolition of existing infrastructure, workers and the public must be protected from falling debris by measures such as chutes, traffic control, and use of restricted access zones. • Install fences, barriers, danger warnings/prohibition site around the construction area, which indicate potential danger to the public. • The contractor shall provide safety measures such as installation of fences, barriers, warning signs, and lighting system against traffic accidents as well as other risks to people and sensitive areas. • If previous assessments indicate there could be unexploded ordnance (UXO), clearance must be done by qualified personnel and as per detailed plans approved by the construction engineer.

Issues/Risks	Mitigation Measures
<p>Chance find procedures</p>	<p>If the contractor discovers archaeological sites, historical sites, remains, and objects, including graveyards and/or individual graves during excavation or construction, the contractor shall carry out the following measures:</p> <ul style="list-style-type: none"> • Stop the construction activities in the area of the chance find. • Delineate the discovered site or area. • Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be arranged until the responsible local authorities or the National Culture Administration take over. • Notify the project environmental officer who in turn will notify the responsible local authorities and the Ministry of Culture, Sports, and Tourism immediately (within 24 hours or less). • Responsible local authorities and the Ministry of Culture, Sports, and Tourism would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the Ministry of Culture, Sports, and Tourism. The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values. • Decisions on how to handle the finding shall be taken by the responsible authorities and by the Ministry of Culture, Sports, and Tourism. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration, and salvage. • Implementation for the authority decision concerning the management of the finding shall be communicated in writing by relevant local authorities. • Construction works could resume only after permission is granted from the responsible local authorities or the Ministry of Culture, Sports, and Tourism concerning safeguard of the heritage.

Worker Codes of Conduct

- All workers and subcontractors shall abide by the laws and regulations of Vietnam.
- Illegal substances, weapons, and firearms shall be prohibited.
- Pornographic material and gambling shall be prohibited.
- Fighting (physical or verbal) shall be prohibited.
- Workers shall not be allowed to hunt, fish, or trade in wild animals.
- No consumption of bush meat shall be allowed in the camp.
- No pets shall be allowed in the camp.
- Creating nuisances and disturbances in or near communities shall be prohibited.
- Disrespecting local customs and traditions shall be prohibited.
- Smoking shall be prohibited in the workplace.
- Maintenance of appropriate standards of dress and personal hygiene shall be in effect.
- Maintenance of appropriate hygiene standards in accommodation quarters shall be set in place.
- Residing camp workforce visiting the local communities shall behave in a manner consistent with the Code of Conduct.
- Failure to comply with the Code of Conduct or the rules, regulations, and procedures implemented at the construction camp will result in disciplinary actions.

86. In addition to the ECOP and Worker Codes of Conduct applied during construction, during engineering design, the PMUs should take into account the following measures to enhance environmental benefits:

- Greening and landscaping.
- Solutions for solid waste collection/treatment, treatment of wastewater from laboratories (as recommended by the participants during public consultations) either in engineering design and/or operational practices, depending on the scale and functions of each benefited university.
- Access for disabled people (wheel chairs and so on; this has become a mandatory requirement by the Law on Disabled People of Vietnam - 2011).
- Noise isolation/proof and optimal use of natural lights for library and classrooms.
- Water and electrical facilities should be power-saving type.
- Toilet rooms should have adequate light and ventilation, provide enough privacy for females, be lined with no slippery tiles for safety but also to ensure that the floor is easy to clean, and so on.
- Art/architectural design of staircase handrails, windows, balconies, and so on to reflect regional culture if/when suitable.

Environmental Management Capacity of the Program

87. All environmental divisions under DPCs and City People's Committees (CPCs) have experience in appraising EPPs. The number of environmental officers is adequate. However, the overall institutional capacity to implement EPPs is limited. Here are the principal challenges.

- (a) **Although project owners and consultants have some experience with EPPs and the integration of mitigation measures into projects, this capacity should be enhanced under the Program.** The common practice is for the feasibility study or engineering design consultants to prepare the EPP. In some cases, an independent environmental consultant is hired to prepare the report. Under the first scenario, the consultant is usually strong technically but there are gaps in the consultant's environmental assessment capacity. Under the second scenario, the lack of coordination and/or cooperation between the two teams may lead to technical constraints in the quality of the reports. Nevertheless, the role of the LTTUs in monitoring and coordinating the consultant's activities is very important for the sustainability of subprojects.
- (b) **In practice, post-EPP monitoring is weak.** Environmental authorities normally only carry out inspections of infrastructure projects when concerns are raised or complaints are received. The contractor's environmental compliance, including health and safety issues, depends on the contractor's awareness and capacity and enforcement by the monitors/supervisors such as the LTTU/construction supervision/community.
- (c) **Unless specifically specified in their contracts, the role of construction supervisors in monitoring environmental compliance of contractors is limited.** In many cases, communities engaged by the LTTUs have actively monitored the contractors and enforced the contractor's environmental performance.

- (d) **Although communities have been actively engaged in monitoring contractor’s performance, including environmental performance of construction projects, they are not necessarily done in a systematic manner.** Environmental awareness campaigns have been conducted by the DONRE and relevant organizations such as women’s unions to raise community environmental awareness. Environmental protection has been integrated into city specific rules.
- (e) **The existing environmental management system is weak.** Existing regulations only require the feasibility study report to include a section on environmental issues and submission of EIA/EPP reports for appraisal to relevant authorities and are not compulsory until the project owner applies for the construction license, that is, when the feasibility study and engineering design have already been completed. This poses the risk that the engineering team is not fully aware or informed of potential environmental impacts and risks and that mitigation measures and costs are not incorporated properly into the feasibility study and engineering designs.

VI. Conclusions and Recommendations

88. Given the small scale and simplicity of upgrading activities supported under the Program and their location, the overall environmental management risk is considered Low. Institutionally, the environmental management function is fully established from central to district level and is ready to manage the environmental aspects in the ETEP. Environmental Divisions under the DPC and CPC will be the key environmental authority responsible for reviewing EPPs of subprojects under the Program. The implementation of the EPP will be the responsibility of the LTTUs.

89. However, a few shortcomings have been identified in the performance of the environmental management system, including weaknesses in environmental screening and assessment, weaknesses in post-EPP monitoring and supervision practices, and challenges in ensuring environmental compliance during construction. There is also a need to ensure that design, construction, operation, and maintenance is resilient to key aspects of climate change that are relevant to the area.

90. From the environmental management perspective, the following measures are recommended. However, as will be indicated, some are included in the Program Action Plan for this Operation.

- (a) **To promote institutional sustainability, the environmental management capacity of the LTTUs should be strengthened.** A capacity-building Program including formal and on-the-job trainings should be developed and implemented. A qualified environmental specialist should be designated at the central level to provide technical advisory support to the LTTUs in the early stage of the Program and prepare an environmental training plan for the Program. The environmental training plan should cover all key stakeholders such as the LTTU environmental officers, construction supervisors, and contractor site engineers and include specific training on resilience to climate change for infrastructure subprojects. Environmental Divisions under the DPC or CPC should also be engaged in the Program environmental capacity building. Specific emphasis will be placed on improving contractor performance relating to environmental compliance. *Specific information on the environmental screening and*

assessment process to be used under the Program as well as further details on the necessary capacity-building activities will be included in the Operations Manual.

- (b) **The roles of construction supervisors in monitoring environmental compliance of contractors should be specifically stated in their contracts** to ensure that potential adverse environmental impacts are avoided or minimized during the construction phase.
- (c) **Community participation in design and construction monitoring should be bolstered.** While community consultation is compulsory during the preparation of environmental assessment reports, continued consultation with local communities should be required under the engineering design contracts. The LTTUs should be coordinate with local authorities to arrange for community monitoring, which has proven to be effective in past projects.

CHAPTER 3: PROGRAM SOCIAL MANAGEMENT SYSTEM

I. Social Context

91. **Achievements and Challenges.** Vietnam has always emphasized education as a keystone of its development policy. As one sign of this commitment, it allocates nearly 20 percent of public expenditures to education, significantly above the Organization for Economic Co-operation and Development (OECD) average of 12.9 percent.¹¹ A national network of schools, colleges and universities has expanded dramatically improving access to education at all levels.

92. The country has essentially achieved universal primary education and is moving towards universal preschool education for five-year-old children and universal lower secondary education. Between 2001 and 2010, net enrolment rates at lower secondary and high school levels increased from 70 percent to 85 percent and 33 percent to 50 percent respectively.¹²

93. Vietnam has also make considerable progress in creating better learning conditions in schools. The Ministry of Education and Training (MOET) has developed the “Fundamental School Quality Level (FSQL)” in 2006, which establishes minimum standards for physical facilities, school organization and management, teaching materials and teacher support, and school-parent linkages for primary students. Full-day schooling for primary and lower secondary education has gradually expanded to increase learning hours.

94. Vietnam has also attained higher levels of student learning achievement. Its performance on the 2012 Program for International Student Assessment (PISA)¹³ surpassed the OECD country average and many developed economies.¹⁴ In addition, variation around the mean scores was relatively small.

95. While achievements are impressive, Vietnamese authorities are concerned that their education system is not well positioned for the age of globalization and international competition because it does not provide the population with the skills and competencies needed for producing greater value in the future.¹⁵ Addressing these challenges is the next frontier of education development in Vietnam. Fully recognizing the importance of these issues, Vietnam’s 2011-2015 SEDP stated that the “quick development of high quality human resources is essential for the country’s industrialization, modernization, and the development of a knowledge-based economy.”¹⁶ This is expected to be confirmed in the 2015-2020 SEDP.

¹¹ Education at a Glance, OECD, 2011. Page 248.

¹² United Nations Education Science and Culture Organization (UNESCO). 2015. Vietnam: Education for All 2015 National Review.

¹³ PISA (Program for International Student Assessment) is a worldwide study by OECD in member and non-member nations of 15-year-old school pupils’ scholastic performance on mathematics, science and reading. Vietnam scored 511 (17th place out of 65 tested countries) on math, 508 on reading (19th place), and 528 on science (8th place).

¹⁴ OECD. 2012. PISA 2012, Result in focus retrieved from www.oecd.org/pisa/.../pisa-2012-results-overview.pdf.

¹⁵ Skilling Up Vietnam: Preparing the Workforce for the Modern Market Economy, World Bank. November 2013

¹⁶ Vietnamese Government. 2010. Socio-Economic Development Strategy for 2011-2015

96. Government response. Addressing the combination of “new and old business” represents a considerable challenge for the Vietnamese education system, regardless of past successes. Teaching higher order skills in general education will mean defining new standards, developing new pedagogical approaches, setting up learning assessment and establishing and applying new incentives. These changes will particularly task schools that serve more disadvantaged populations that still struggle to meet first generation educational goals.

97. In 2013, the 11th Party Congress at its 8th meeting session adopted the Fundamental and Comprehensive Education Reform (FCER),¹⁷ which aims for education to meet “the requirements of industrialization and modernization in the socialist oriented market economy and international integration.” It constitutes a political and legislative umbrella for a broad sector-wide reform.

98. New strategies to meet new objectives. The FCER’s priority is general education (grades K-12), where learning approaches are to become less content-based and more competency- and quality-based. It intends for all Vietnamese students to obtain higher order cognitive and behavioral skills, such as the ability to think critically and creatively, apply knowledge from many subject areas to solve practical problems, work in teams, and convincingly communicate verbally and in writing.¹⁸ To that end, general education will introduce, inter alia, new curricula and methods of instruction, develop a comprehensive learning assessment system and reform teacher education.

99. The FCER retains at the center of Vietnam’s education development strategy the importance of equal opportunity. Thus, all students, regardless of ethnicity, income or gender must have an equal opportunity to master these new higher order skills and competencies.

100. Past successes in increasing access to education and higher learning achievement for disadvantaged groups were the product of a wide array of interventions sustained over a long period of time. The government developed and adopted both supply¹⁹ and demand²⁰ side strategies. The FCER now aims for an 80 percent upper secondary enrollment rate that can only be reached by a fast expansion of enrollment amongst ethnic minorities. Although some of the same successful strategies might remain pertinent, secondary education is considerably more complex what with the variety of learning paths, the high stakes competition for tertiary education, and the new ways of teaching and learning that are to be adopted. Thus, the new education sector reform may constitute a particular challenge for ethnic minority children because it raises the bar by introducing new skills and competencies – just when these same children have begun to become proficient at the existing learning goals.

101. However, the reform also represents an opportunity for ethnic minority children because the new pedagogy favors a tailored approach to learning and teaching that takes into

¹⁷ Resolution No 29/NQ-TW issued on 4th November 2013 of the 8th Conference of the 11th Session of the Central Executive Committee on Fundamental and Comprehensive Education Reform.

¹⁸ Ibid.

¹⁹ For example, school construction and improvement programs targeting selected regions and/or population groups; incentives for teachers to be deployed to remote areas and to attract ethnic minorities to the teaching profession; deployment of specialized teachers or teacher aides (e.g., language assistants); development of programs for children whose mother tongue is not Vietnamese.

²⁰ For example, school fee exemptions, discounts, school lunches, scholarships and information campaigns

consideration context, the specific characteristics of the learner and insists that all children can succeed. In consequence, the new teacher professional profile will be particularly apt, since teachers will need to tailor their teaching approaches to the specific challenges facing ethnic minority children.

102. It is difficult to predict whether the new skills and competencies will be more difficult to master for girls or boys, although the education system should develop the tools and mechanisms to detect any differences as they appear. However, as mentioned above, one of the key gender issues in the education system has to do with equal access of female personnel to leadership and management positions. The efforts to reinforce teacher education will also provide an opportunity to affect the gender balance in higher-level positions in general education.

103. Teachers are at the center of the reform process. The success of such a reform will depend almost exclusively on the preparedness of the teacher to master this new pedagogical paradigm. One of the underlying principles of the FCER is that teachers should be equipped to respond to different contexts that are themselves constantly changing. Essentially, the FCER will require teachers to become increasingly professional, i.e., to adapt methodologies and knowledge to real-time problems as they arise in his or her classroom and school. This is similar to the professional models of medical doctors, researchers, policy analysts and other knowledge-based fields. Training and supporting such teachers requires greater interaction between professionals, reciprocity, hands-on mentorship and coaching and on-time advice to solve identified problems.

104. In sum, for teachers to acquire this new type of professional profile, they will need school-based continuous professional development (CPD). Considering the nature of the expected changes to teaching methodology and professional responsibility, most research on the matter has indicated that school-based CPD (provided through face-to face and online platforms) has the greatest influence on teacher competencies, classroom behavior, and effectiveness, particularly since it prepares teachers to respond to quickly changing situation and a wider array of differing demands.²¹ By “bringing training to the teacher”, school-based CPD can help teachers more effectively master these new methods and competencies.

105. Teacher education in Vietnam has many strengths, but it is not necessarily prepared to help teachers acquire this different professional profile, nor to ensure the highest quality and most responsive onsite continuous professional development. One of the biggest challenges is that teacher education actors do not function in a coordinated manner to meet teacher and principal new needs. The Ministry of Education and Training (MOET) has prepared the National Teacher Education Program (NTEP) to enable the teacher education system to adapt more effectively to the changing needs of teachers to meet learning objectives.²² The NTEP focuses on one of the FCER Programs -- the Reform of Pre-service and In-service Training -- to produce a comprehensive strategy for realigning teacher education to the new requirements of general education. ²³

²¹ Francesca Caena, 2011. Quality in Teachers' Continuing Professional Development. Education and Training 2020: Thematic Working Group

‘Professional Development of Teachers’, European Commission, Directorate-General for Education and culture.

²² The MOET has recently submitted the National Teacher Education Program to the government for approval and authorization. These endorsements are expected before Negotiations.

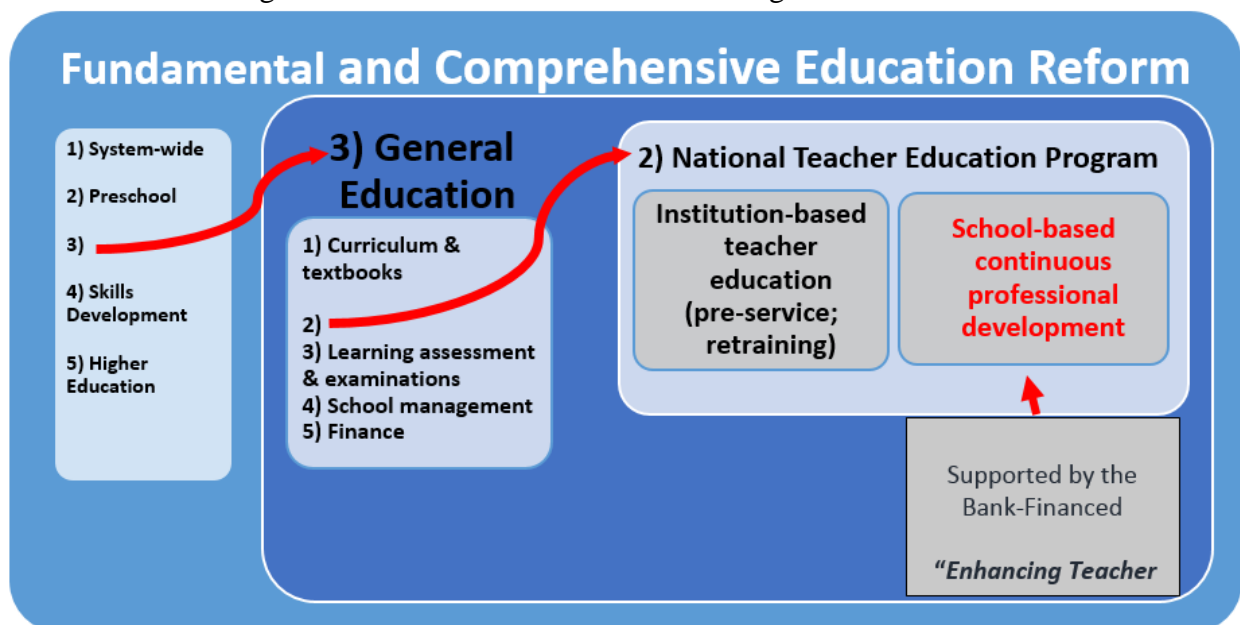
²³ The MOET is currently developing a complementary program to reorganize and rationalize the network of TTIs. Once MOET finalizes and approves this program, it will take the lead in ensuring that it is closely

106. In consequence, as part of the FCER, the Ministry of Education and Training (MOET) has prepared the National Teacher Education Program (NTEP) that, inter alia, aims to modernize and render more responsive school-based teacher and principal continuous professional development.²⁴

107. The NTEP is a comprehensive strategy for realigning teacher education to the new requirements of general education. The NTEP proposes several paths of intervention: pre-service training for new teachers, retraining for some teachers to obtain additional qualifications, in-service training programs that bring teachers to training centers for specific objectives and continuous professional development (CPD) that provide support and training to teachers within schools.

108. Of the different elements of the NTEP, the government and the World Bank decided that the Bank financed Enhancing Teacher Education Program (ETEP) should focus on school-based continuous professional development. The nature of the expected changes to teacher methodology, as well as the findings of much research on teacher professionalism, point to school-based CPD (provided through face-to face and online platforms) as having the greatest influence on teacher competencies and behavior. By “bringing training to the teacher”, school-based CPD can help teachers more effectively adopt new methods and master new competencies. Furthermore, since there will be little need to recruit additional teachers because of demographic shifts and a current surplus of teachers, school based interventions constitute the principal lever for successfully achieving the FCER goals for general education.

Figure 1: National Teacher Education Program in context



109. Vietnam possesses a keen advantage as it enters a new generation of education sector development. It builds from the base of a well-functioning education system that has

coordinated with ETEP and NTEP, and that it effectively partners with the LTTUs. LTTUs can already collaborate with other TTIs and include this action in their Performance Agreement as appropriate.

²⁴ The MOET has recently submitted the National Teacher Education Program to the government for approval and authorization. These endorsements are expected before Negotiations.

provided exceptional results. The system has produced learned children distributed quite equitably across Vietnam. Many better-endowed countries would be envious of this result. However, the challenges of the next phase of education development should not be underestimated.

A. Ethnic Minorities

110. Vietnam is a multi-nationality country with 54 ethnic groups. The Viet (Kinh) people account for 87 percent of the country's population and mainly inhabit the Red River delta, the central coastal delta, the Mekong delta, and major cities. The other 53 ethnic minority groups, totaling over 8 million people, are scattered over mountain areas (covering two-thirds of the country's territory) spreading from the north to the south. Among ethnic minorities, the largest groups are Tay, Thai, Muong, Hoa, Khmer, and Nung with a population of around 1 million each, while the smallest are Brau, Roman, and Odu with several hundred people each. Ethnic minority poverty presents a particular and persistent challenge for Vietnam. Almost the entire story of eliminating extreme poverty in Vietnam is that of ethnic minorities, who are 14 percent of the population and comprise 60 percent of the poor by the national poverty line.

111. There has been considerable progress over the last two decades, with almost all ethnic minority children and girls enrolling and attending primary schools,²⁵ and minor difference in enrollment rates for lower secondary education for ethnic minorities and none with regards to gender.

112. In terms of learning, gaps exist but are narrowing between children from majority groups and those from disadvantaged ethnic minorities. Over the last decade, ethnic minority children have registered impressive gains in mathematics, reading, and particularly Vietnamese language. However, gaps persist, in part because scores for all populations have been increasing over recent years.

113. However, the access profile for ethnic minorities changes dramatically starting with upper secondary school. From age 14 (the last year of lower secondary) a steep fall-off in ethnic minority enrollment begins, and relatively few children from ethnic minorities make the jump to upper secondary. Whereas the lower secondary enrollment rate is 85 percent, it drops to 60 percent for upper secondary (with just a third of the poorest quintile of the student population succeeding in that transition). For the moment, this drop-off has remained steady over time. This constitutes a major brake in higher education enrollment.

114. The FCER retains at the center of Vietnam's education development strategy the importance of equal opportunities. Thus, all students, regardless of ethnicity, income or gender must have an equal opportunity to master these new higher order skills and competencies.

115. Past successes in increasing access to education and higher learning achievement for disadvantaged groups were the product of a wide array of interventions sustained over a long

²⁵ The remaining primary and lower secondary enrolment gaps between disadvantaged ethnic minorities and other groups are expected to close soon. The overall enrolment rate for ethnic minority children is 89% (steady rising by one percent per year) but then enrolment rate for 7-9 year olds is 100%. With nominal primary and lower secondary school dropout rates, we can expect

period of time. The government developed and adopted both supply²⁶ and demand²⁷ side strategies. The FCER now aims for an 80 percent upper secondary enrollment rate that can only be reached by a fast expansion of enrollment amongst ethnic minorities. Although some of the same successful strategies might remain pertinent, secondary education is considerably more complex what with the variety of learning paths, the high stakes competition for tertiary education, and the new ways of teaching and learning that are to be adopted. Thus, the new education sector reform may constitute a particular challenge for ethnic minority children because it raises the bar by introducing new skills and competencies – just when these same children have begun to become proficient at the existing learning goals.

116. However, the reform also represents an opportunity for ethnic minority children because the new pedagogy favors a tailored approach to learning and teaching that takes into consideration context, the specific characteristics of the learner and insists that all children can succeed. In consequence, the new teacher professional profile will be particularly apt, since teachers will need to tailor their teaching approaches to the specific challenges facing ethnic minority children.

117. This Program targets education administrators and teachers across the country, including those from ethnic minorities and vulnerable groups, to facilitate accessibility to professional services to enhance their effectiveness and subsequently broaden their opportunities to improved job opportunities and living standards.

118. **Gender.** Vietnam has largely achieved gender equality in general and higher education.²⁸ However, gender gaps continue, but in different forms. Whereas there are more women enrolled in higher education than men, they are less likely to study sciences, engineering and other technology oriented fields. In addition, and this is of particular import for this operation, women tend to be underrepresented in management positions. As is the case in many countries, there are substantially more female than male general education teachers, but far fewer female school directors, subject specialists, district/provincial/national administrators, or university faculty.

119. It is difficult to predict whether the new skills and competencies will be more difficult to master for girls or boys, although the education system should develop the tools and mechanisms to detect any differences as they appear. However, as mentioned above, one of the key gender issues in the education system has to do with equal access of female personnel to positions of authority and management. The efforts to reinforce teacher education will also provide an opportunity to affect the gender balance in higher level positions in general education.

120. The consultations with different stakeholders indicated female administrators and teachers, especially elder administrators and teachers from ethnic minority groups in mountainous and remote areas sometimes face specific constraints. Some have to take secondary jobs to top up their modest teacher salaries. In addition, female teachers have to spend considerable time on household chores outside school hours, which may result in time constraints for various capacity-building activities under the Program.

²⁶ For example, school construction and improvement Programs targeting selected regions and/or population groups; incentives for teachers to be deployed to remote areas and to attract ethnic minorities to the teaching profession; deployment of specialized teachers or teacher aides (e.g., language assistants); development of Programs for children whose mother tongue is not Vietnamese.

²⁷ For example, school fee exemptions, discounts, school lunches, scholarships and information campaigns

²⁸ With the exception of ethnic minority girls.

121. The women’s unions may play an important role in raising the motivation of teachers and principals to become Core Teachers and Principal Advisors, as well as faculty in LTTUs.

122. The consultations found almost no gender discrimination in workload and remuneration at the school level. It also reported no considerable difference in accessibility to IT facilities between male and female teachers, although the former may be slightly faster learners of ICT.

123. **Disability.** The Law on People with Disabilities was issued on June 17, 2010 to guarantee the rights of people with disabilities, and Government Decree 28/2012/NĐ-CP was enacted on April 10, 2012, providing guidance on the implementation of the Law on People with Disabilities. **Article 4** of the law stipulates the rights and obligations of people with disabilities to ensure their equal participation in social activities and entitlement to support in employment, IT, and other services in accordance with the type and severity of their disabilities. The article recommends that accessibility of people with disabilities be taken into account in infrastructure development to ensure that persons with disabilities can have access to the developed services. **Article 5** stipulates that the state encourage activities to support the people with disabilities, while **Article 7** stresses that agencies and organizations be responsible for protecting legitimate rights and benefits of people with disabilities. **Article 27** stipulates that people with disabilities be provided with exclusive learning facilities when needed. Especially, **Article 29** states:

“Teachers and education administrators who are involved in providing education for people with disabilities...shall be provided with technical and professional knowledge and skills and refreshment courses to meet needs of people with disabilities...”

124. **Article 30** stipulates the responsibilities of educational institutions for:

- Ensuring teaching and learning conditions in accordance with those of people with disabilities...; and
- Rehabilitating and upgrading teaching and learning facilities that are inaccessible by people with disabilities.

125. **Article 43** recommends that the state encourages agencies, organizations, and businesses involved in the IT sector to apply and develop IT facilities for people with disabilities.

126. **Article 50** stipulates the responsibilities of the MOET for training teachers and education supporting staff and compiling materials and textbooks for learners with disabilities. The ministry is obliged to provide guidance on researching, developing, and supplying teaching facilities in accordance with each type and level of disabilities.

II. Potential Social Impacts

Potential Benefits

127. According to the consultations, principals and teachers from the participating agencies across the country, including those from ethnic minorities and other vulnerable groups, will benefit from the Program. There was general support for the proposed objectives and design of the Program. Given the composition of consultation participants, full support has been received from a broad range of stakeholders, all levels of local authorities, the provincial and

district to the commune levels, and various ethnic minorities groups in the project sites, such as Tay, Nung, Thai, Dao, and Ede. All these participants confirmed their full support for the concept and approach of the proposed Program, seeing them as a practical and useful way to enhance the effectiveness of teachers from general schools across Vietnam. In particular, implementing the Program would enable (a) developing selected teacher training institutions so that they have enhanced capacity to provide on-site and needs-based CPD support to general teachers and managers; (b) building up an ICT-based Learning Management System for all so that teachers can have access to quality online professional development courses, shared resources for teaching and learning contributed by specialists and practitioners in education, and peer discussions and/or exchange of ideas; and (c) building capacity in strategic planning and management for teacher education.

128. Both male and female principals and teachers from the participating institutions expressed interest in participating in the Program activities.

129. Actual needs of beneficiaries with disabilities would be carefully considered and incorporated into the Program activities to ensure their equal access to the Program benefits. This will create more favorable conditions for them to be mainstreamed into professional life in the country's education sector and contribute to its common development.

Possible Program Risks

130. According to consultations, potential adverse social effects and risks under this Program are related to (a) widened gap in education opportunities and outcomes; (b) lack of adequate beneficiary consultation and participation; and (c) limited interest in and low motivation to join the Program among some groups of target teachers. These social effects and risks are presented in detail here.

(a) **Widened gap in education opportunities and outcomes.** Participants were concerned that some of the new approaches and contents under the Program may be acquired and employed less effectively by teachers from various ethnic minority areas across the country, for various reasons, including cultural, language, and physical barriers. These barriers, if not addressed, may result in unequal education opportunities and outcomes between regions and between social groups. There are thus potential risks from the Program that may contribute to or cause some unintentional impacts, direct and indirect alike, on the widening gap in education opportunities and outcomes between Kinh-dominant areas and ethnic minority areas. In areas where ethnic minority populations are present, the Program interventions are designed keeping in mind their specific cultural and social context, and the ethnic minority people are not excluded and can benefit equally from Program benefits.

(b) **Lack of adequate beneficiary consultation and participation.** Another challenge is to involve the beneficiaries throughout the Program implementation cycle, from the design to the completion stage, to maximize benefits and minimize the adverse impact to beneficiary teachers and principals, including those from ethnic minorities and other vulnerable groups. An important purpose of good consultation and participation is to increase ownership and allow potential beneficiaries to make informed choices. Due attention should be paid to the need to ensure an appropriate and inclusive approach to working with beneficiaries, including those from ethnic minorities and other vulnerable groups whose participation is currently inadequate due to a lack of both operational procedures for adequate implementation of the legal

framework for ethnic minorities and guidance on the participation of ethnic minorities in the Program cycle.

(c) **Inadequate IT infrastructures in difficult regions.** The consultations with related stakeholders showed that one of the most important concerns appears to be inadequate IT infrastructures in mountainous and remote areas. In some difficult areas in mountainous provinces, such as Yen Bai and Dak Lak, there is a lack of computer and IT facilities, a lack of computer skills, and limited Internet connection. In some difficult areas, computer facilities are available at schools but mostly for the use of managers and administrative staff.

Indirect Impacts

131. According to the consultations, the Program will improve the education outcomes of school students across the country, including those from ethnic minorities and other vulnerable groups, through enhancing the effectiveness of principals and teachers from the participating institutions nationwide.

132. The improved education outcomes would subsequently create better conditions for ethnic minority young people, increasing their competitiveness in the labor market and thus enabling them to take advantage of business and income opportunities, rather than consigning them to the lower-return sectors of subsistence agriculture as at present. The Program will therefore bring about opportunities for poverty reduction and improved living standards among ethnic minority groups, especially those in mountainous and remote regions.

III. Social Management Systems

A. Higher Education

The Legal Framework

133. The guiding law on higher education in Vietnam is the Law on Higher Education, adopted by the National Assembly, 13th tenure, on June 18, 2012. The law aims to boost the quality of the education sector and enhance the capacity and innovation of higher principals, teachers, and students. There are a number of decrees guiding the implementation/application of the Law on Higher Education, including:

- **Government Decree No. 141/2013/NĐ-CP**, dated October 24, 2013; and
- **Decision No. 70/2014/QĐ-TTg**, dated December 10, 2014.

134. These three important legal documents provide impetus for the reform of the education philosophy and state regulation in the higher education sector.

Institutional Arrangements

135. **Mechanism to identify social issues in the education sector.** In the Vietnamese education system, the safeguard of fair and inclusive benefits of ethnic minority groups and those who live and work in mountainous areas and areas with especially difficult socioeconomic conditions have been improved in a regular, efficient, and fair manner. It has also been made mandatory through the policies and legislation of the National Assembly, the

government, the prime minister, the MOET minister, and other related ministries and agencies.

136. This mechanism functions as follows: the National Assembly enacts policies to ensure equity in the Education Law, the Higher Education Law, and the Law on Vocational Education, which are further concretized through decrees, resolutions (exclusive documents), and decisions. Ministers specify the enforcement of laws, government decrees, and the prime minister's decision through their ministerial and inter-ministerial circulars on sectoral management. Since the effectiveness of the regulatory documents, subnational authorities are obliged to fully implement stipulations. In particular, PPCs and Municipal People's Committees issue guidance on implementation to departments, divisions, and schools. Beneficiaries and functional agencies take responsibility for monitoring and evaluating local impacts of documents and their implementation. The DOETs (the Department of Education and Training), which are responsible for education in at the province level oversee the BOETs (Bureaus of Education and Training) at the district level. Primary schools answer to BOETs and secondary schools to the DOETs. DOETs answer to the PPCs. Every year, the MOET requests the DOETs to submit annual reports on the implementation of policies and legislation for ethnic minority groups. The MOET also sends missions to supervise the actual implementation of these policies and legislation in addition to the oversight by the Government Inspectorate (GI) and National Assembly's missions, to make decisions on adequate adjustments and changes.

137. **The communication mechanism.** According to the consultations conducted, the conventional channels of communication between teachers and management are hierarchical in the order from teachers to head teachers, to principals, the BOET, and then to the DOET. Some needs and feedback may be missed or underreported through such a communication line. Sensitive comments or requests may not be expressed explicitly through immediate managers. Guidance and instructions also undergo the same channels.

138. **Stakeholder participation.** On August 24, 2015, the MOET issued a regulation on cooperation responsibilities among stakeholders under the MOET in managing ODA Programs and projects funded by ODA and other concessional loans. Under the regulation, the Department of Planning and Finance shall take charge of consultations with other relevant ministries and sectors on project documents and report inputs from consultations to the MOET management for consideration and decision (for projects under the jurisdiction of the MOET minister) or for signing by the MOET management to be forwarded to the MPI (the Ministry of Planning and Investment) for appraisal and to the prime minister for approval (for projects under the jurisdiction of the MOET minister). The regulation also stipulates that the related departments and bureaus, as well as other related stakeholders within their jurisdiction, be responsible for providing inputs and comments on project documents. In particular, during the preparation for the NTEP and ETEP, a series of consultative meetings, intensive discussions, and workshops were held with rectors of the seven selected TTUs and the NIEM and various stakeholders, including the private sector (Viettel). Field visits were made to provinces and cities of Yen Bai, Hoa Binh, Vinh Phuc, Thai Nguyen, Nghe An, Hue, Da Nang, Dac Lac, and Ho Chi Minh City. The inputs and comments from the consulted stakeholders had been acknowledged and considered for revisions whenever deemed relevant.

139. **Grievance Redress Mechanism regarding corruption.** The legal framework on complaints and denunciations is mainly based on the 2005 Anti-Corruption Law and its amendments in 2007 and 2012 and the 2011 Laws on Complaints and on Denunciation.

Decreets 75 and 76, dated October 3, 2012, guide the implementation of the 2011 Laws on Complaints and on Denunciation. The 2005 Anti-Corruption Law and its amendments in 2007 and 2012 and the 2011 Laws on Complaints and on Denunciation entitle citizens to submit complaints on fraud and corruption (among others) to the government People's Committee at the appropriate level. A complaints handling system will receive, record, and provide necessary investigative actions where a complaint is deemed legitimate. A parallel complaints 'system' is also instituted in the GI offices under line ministries and departments at the central and provincial level. The GI's main functions are to inspect both compliance as well as allegations of fraud and corruption in their respective sectors.

140. The 2005 Anti-Corruption Law and its amendments in 2007 and 2012 and the 2012 Law on Higher Education stipulate the obligation of the education institutions to disclose information to the public on the management and use of public budget, state property and assets, staff and financial resources for education, the support provision and other investment for education, and other revenues. In particular, Circular 09/2009 of the MOET details that public education institution must disclose and make publicly available the commitment of education quality; education accreditation results; condition to ensure quality of education; the collection, management, and use of tuition fees; recruitment charges; other revenues from consultancy, transfer of technology, and investment for education; and other financial revenue and expenditure items. The Program implementing agencies have done a good job on disclosing information on their general operations such as commitment of education quality, education results, and fees and related charges through their website. Financial information of the institutions, including on investments for education and financial statements, however, was not yet adequately disclosed to the public.

141. The Program implementing agencies have already issued detailed procedures for handling grievances. Very few complaints were registered at the implementing agencies. This is largely because of the transparency effort that the agencies have been implementing over the years, including the annual public employee conferences where staff in each agency can openly voice their concern to its leadership. The MOET's Inspectorate is charged with compiling all the complaints and denunciations at all institutions under the MOET's jurisdiction in a systemic manner, according to Circular 15/2013 of the MOET. A new division under the MOET Inspectorate has been established since early 2015 to handle grievances in relation to the operations of the MOET and its subordinate agencies. From 2016 onwards, the MOET would have proper registries of grievances and record how they have been handled within the MOET's mandate.

142. No complaints have been recorded by the Bank complaint database in the education sector during 2014–2015. Of the complaints registered concerning the education sector, which is about 10 percent of the total complaints of the portfolio during the ten-year period from 2005 to 2015, two complaints were substantiated and forwarded to INT for further actions in 2006 and 2011. No evidence of fraud and corruption has been disclosed by INT on the two cases. Most of the complaints registered so far in the sector concern goods contracts; hence, the need for more due diligence actions with regard to contract management of the Program implementing agencies.

143. **Grievance Redress Mechanism regarding access to service.** The very nature of the ETEP improves the possibility that the voice of teachers and principals will be heard with regards to access to high quality CPD that is relevant and adapted to their priority needs. Between the Core Teachers and Principal Advisors who work by their side, the needs assessment systems and the opportunity to communicate and learn from a wide network of

colleagues and stakeholders all provide vehicles for being taken seriously in ways that never existed before

B. Gender Mainstreaming

144. The promotion of gender equality in and through teacher education is regarded critical in the ETEP because it will ultimately contribute to quality teacher education by ensuring that both male and female staff and teachers have equal access to CPD opportunities and that timely and adequate gender-specific support to teacher is provided. The following measures are recommended to be implemented in and through the Program.

- (a) **Gender mainstreaming in teacher education policy.** The MOET has identified teacher education policies as the key area of priority, which could be better gender informed. Those policies include ones on (i) requirements to enter and remain in teaching; (ii) recruitment and employment; (iii) teacher work positions/workload and compensation; (iv) professional development; (v) M&E of teacher quality/effectiveness; (vi) teacher representation/union; and (vii) school leadership. Eventually, similar to many countries, males are dominant in higher management positions while the teacher corps is female dominant.
- (b) **Gender mainstreaming in education sector leadership.** Gender equality promotion has increasingly become better aware as a cross-cutting theme of all Programs managed by the MOET/DTEM. Under the NTEP and ETEP, a policy on teacher professional development will be further developed to include the promotion of gender balance, particularly with regards to promote women to submit candidatures to leadership positions, such as Core Teachers, Principal Advisors and LTTU faculty and specialists. Along with the NTEP, two other Programs, which are managed by the MOET/DTEM, that promote gender balance in teacher recruitment and employment (Education Human Resource Master Plan and the Work Position Scheme) are also under way.
- (c) **Gender mainstreaming within the LTTUs.** There are several gender inequalities in the eight LTTUs selected to lead the CPD renovation in the Program, namely (i) recruitment policy in favor of male candidates, for example, loosen requirements for men; (ii) preference of males for high-level management and leadership positions; and (iii) limited support to women in professional development and research, which results in low number of women acquiring doctorates and professorships. It is recommended that lead TTUs specifically address these issues by, among others, updating recruitment policies that treat male and female candidates equally, empowering women leadership, and providing additional support for female faculty and staff in research and professional development.
- (d) **Gender mainstreaming in the selection of Core Teachers and Principal Advisors will be clear and objective and have no gender bias.** Gender responsiveness will be made one of the principles in developing selection criteria for Core Teachers and Principals in the Program to ensure that male or female teachers have equal opportunity to be selected as Core Teacher under equal terms and conditions and that after being selected, they are given the same incentives.

C. Ethnic Minorities

The Legal Framework

145. Vietnam's legal provisions and state policies that support ethnic groups and provide development assistance to respond to their needs are better than those provided by other countries in the region. For example, preferential treatment is granted for admission to education establishments. There are provisions of special subsidies such as cooking oil, kerosene, and iodized salt. The government has made high-level commitments to address social inclusion (including education) for ethnic minorities, for example, in the Development Partnership Forum and in high-level statements from government leaders. The government, along with foreign development partners and many nongovernmental organizations, has provided assistance Programs/projects that target ethnic minorities. The government has a long record of development investments among the ethnic minority groups aimed at support for them to 'catchup' with the rest of the lowland areas.

146. In terms of the national legal framework, equality and rights of ethnic people was stipulated clearly in the Vietnam Law. **Article 5** in the Vietnam Constitution (1992) is as follows: the Socialist Republic of Vietnam is a united nation having many nationalities. The state implements a policy of equality and unity, supports the cultures of all nationalities, and prohibits discrimination and separation. Each nationality has the right to use its own language and characters to preserve its culture and to improve its own traditions and customs. The state carries out a policy to develop thoroughly and gradually improve the quality of life of ethnic minorities in Vietnam, physically and culturally. Decree No. 05/2011/ND-CP(January 14, 2011), provides the guidance for activities related to ethnic minorities, which include support for the maintenance of language, culture, customs, and identities of every ethnic minority.

147. **Article 3** of that decree lays out general principles when working with ethnic minority people, as follows:

- To implement the ethnic minority policy on the principles of equality, solidarity, respect, and mutual assistance for development.
- To assure and implement the policy on comprehensive development and gradual improvement of material and spiritual life for the ethnic minority people.
- To assure preservation of the language, scripts, and identity and promotion of fine customs, habits, traditions, and culture of each ethnic minority group.
- An ethnic minority group shall respect the customs and habits of other groups, contributing to building an advanced Vietnamese culture deeply imbued with the national identity.

148. According to the government policy, proposed projects affecting land, environment, or the life of ethnic minority communities, should disclose information and consultations carried out with representatives of the local authorities, to ensure that all investments result in better life conditions and are carried out in a culturally appropriate manner (**Article 9**), with specific provision in the case of involuntary resettlement. It is also worth noting that the prime minister recently approved the project on "The preservation and development of ethnic minorities' cultures in Vietnam toward 2020" with an estimated budget of VND 1.512 billion (Decision No. 1270/QD-TTg dated July 27, 2011).

Education for Ethnic Minorities

149. To ensure fairness and equity in education and training for ethnic minority groups, the MOET takes responsibility before the government in the area of state regulation in education for all ethnic groups according to various policies and legislative documents. Basically, these regulatory documents can fall into two categories:

- Policies for teachers who are directly involved in teaching ethnic minority students and for principals who work among ethnic minorities and mountainous and especially difficult areas;
- Policies for students who come from ethnic minority groups and mountainous areas or live in areas with especially difficult socioeconomic conditions.

150. Vietnam has achieved remarkable progress in poverty reduction over the past decades. The country's policies and legislation to ensure equity and fairness for ethnic minorities groups have been acknowledged internationally. In the domains of education and training, Vietnam has produced the following policies:

- To encourage ethnic minority children to go to schools through various incentives, scholarships, fee waiver and exemption, food allowances and aid, purchase of textbooks and notebooks, and boarding and semi-boarding mechanism.
- To improve the quality of teaching and learning in ethnic minorities and mountainous areas and areas with especially difficult socioeconomic conditions through policies for principals and teachers (study tours, refresher courses, allowances, allowances for teaching ethnic minority languages, responsibility-based allowances, clean water allowances, allowances for mobile services and regional transfers, and first-time allowances, and so on).
- Over many years, the MOET has authorized the Department of Education for Ethnic Minorities to coordinate with the related agencies to prepare and develop a teaching and learning framework, including accompanying materials, for principals, teachers, and students in ethnic minority areas. The ministry has also strengthened its inspection and guidance to university foundation colleges, boarding and semi-boarding schools, and other education establishments in ethnic minority areas in teaching management, extracurricular hours, and care for boarding and semi-boarding school students, and incentives for principals, teachers, and students. The Department of Education for Ethnic Minorities has organized many refresher courses for principals and teachers in teaching and learning Vietnamese, teaching 'combined classes', ²⁹preservation and promotion of ethnic minorities' cultural identities, and life skills for ethnic minorities' students.
- Many plans and projects have been implemented effectively, such as the Project on Strengthening and Developing Ethnic Minorities Boarding Schools between

²⁹ In some areas, especially in ethnic minority communities, because of a very small number of students per class at each grade, students from various grades share a classroom, which may affect the quality of teaching and learning.

2011 and 2015 and the Project on Promoting Education for Very Small Ethnic Groups between 2010 and 2015. The projects have brought about initial achievements in ensuring inclusive benefits for ethnic minority students despite a limited period of the project cycle. Therefore, it would be good for the MOET, in general, and the Department of Education for Ethnic Minorities, in particular, to have more opportunities to further develop this foundation. Special attention should be paid to semi-boarding teachers and students³⁰ (at the primary and junior secondary levels) who now encounter many hardships in living and studying conditions. The existing semi-boarding schools have very poor resources, especially regarding accommodation and caretakers. As compared with ordinary teachers who conduct only a session per day, semi-boarding teachers conduct two sessions per day and take turns to cook for students. This actual situation has resulted in delivering the required teaching and learning methods.

151. The following is a list of some particularly important regulatory documents to improve fairness, equity, inclusion, and participation for ethnic minority principals, teachers, and students in the general education system:

- Government Decree No. 115/2010/NĐ-CP, dated December 24, 2010, on the responsibilities for state regulation in education.
- Government Decree No. 05/2011/NĐ-CP, dated January 14, 2011, on ethnic affairs.
- Government Decree No. 30a/2008/NQ-CP, dated December 27, 2008, on support for fast and sustainable poverty reduction for 61 poor districts. This decree has an exclusive section on education and training which have considerable impacts on ethnic groups.
- The Prime Minister's Decision No. 2123/2010/QĐ-TTg, dated November 22, 2010, to approve the master plan on promoting education for ethnic groups with very small populations in the 2010–2015 period.
- The Prime Minister's Decision No. 1640/2011/QĐ-TTg, dated September 21, 2011, to approve the master plan on improving and developing the system of boarding schools for ethnic minorities in the 2011–2015 period.

Institutional Arrangements

152. A system of government from the central to the local levels was created to undertake activities related to ethnic minorities people (**Article 22**, Decree No. 05/2011/ND-CP dated January 14, 2011), which provides the following:

- (a) The government shall uniformly perform the state management of ethnic minorities work.

³⁰ Under the existing regulation, students who live at least four kilometres away from schools can stay in a semi-boarding school.

- (b) The Committee for Ethnic Minorities Affairs shall assist the government in performing the state management of ethnic minorities work nationwide.
- (c) Ministries, ministerial-level agencies, and government-attached agencies shall perform the state management of ethnic minorities work under law.
- (d) People's Committees of all levels shall perform the state management of ethnic minorities work in their localities under law.
- (e) Ethnic minority affairs agencies shall be organized at the central, provincial, and district levels in ethnic minorities areas.

153. At the central level, the CEMA assumes the prime responsibility for ethnic minorities and coordinates with the concerned ministries and branches to plan, elaborate, and implement the ethnic minorities' policy and to guide, inspect, examine, review, assess, disseminate, and mobilize the implementation of the Ethnic Minorities policy under this decree. In addition, the CEMA is responsible for coordinating with ministries, branches, and PPCs with regard to initiatives implemented with ethnic minorities in different parts of the country. The CEMA is required to submit an annual report to the prime minister on the implementation of the Ethnic Minorities policy and Programs.

154. Other ministries and ministerial governmental agencies are also expected to assume responsibility for and coordinate with the Committee for Ethnic Minorities Affairs within the remit of their assigned functions, tasks, and powers. People's Committees at all levels are expected to (**Article 25**):

- (a) Implement the party's policy and the state's law on ethnic minorities work under law and this decree in their localities;
- (b) Annually elaborate and implement plans and Programs on ethnic minorities work, to organize, direct, and inspect the implementation of law and policy on ethnic minorities; to organize and direct the application of measures to ensure improvement of material and spiritual life for the ethnic minority people;
- (c) Elaborate and implement local policies, Programs, and projects for ethnic minority areas and areas with socioeconomic difficulties and exceptional socioeconomic difficulties; and
- (d) Submit reports on ethnic minorities and the implementation of the Ethnic Minorities policy and ethnic minorities work in their localities to the CEMA for summarization and reporting to the prime minister.

Challenges:

155. **Limited access to IT among some target beneficiaries.** According to the consultations, a small number of ethnic minority teachers in Dak Lak and Yen Bai, especially those living in remote areas, who are above 40 years of age, seem to fall behind in ICT applications. They have low motivation in applying new technologies in teaching, poor computer skills, and very limited access to computer facilities. Teachers in some deep and remote communities do not have computers. The broadband connection is weak and unreliable. There are differences in computer skills and access to IT facilities between young

and elderly teachers (over 40 years). However, young ethnic minority teachers, many of whom are university graduates, are generally as good at computer skills as Kinh teachers and have their own IT facilities (computer and Internet access) as their Kinh peers.

156. **Interest and level of participation in the Program.** Concerns exist about the motivation and level of participation of teachers and principals from mountainous and remote areas where many ethnic minority groups live. The consultations showed that some of them have to take secondary work to top up modest teacher salaries. Moreover, female teachers have to spend time on household chores outside school hours. There are differences in the level of interest in the Program between young and elderly teachers (over 40 years).

157. **Motivation and interests of teachers in other teacher training Programs.** Experience in current teacher training Programs in and teachers' needs in disadvantaged schools show some issues to be considered. Some of the Programs are not considered effective or well-organized. Attendees are not disciplined, and trainers do not perform well. Some Programs provide interesting content, but many of them are not relevant and applicable to their specific school context. In especially difficult regions, such as mountainous and ethnic minority areas, teachers tend to be more concerned with enrolling students to schools and retaining them to keep dropout rates low rather than in enhancing the students' effectiveness through improving teaching methodologies and technologies.

158. **Teacher evaluation criteria and mechanism.** There are three issues with these criteria. First, ethnic minority teachers and Kinh teachers are evaluated according to the same set of standards and criteria, making it more challenging for ethnic minority teachers from difficult areas to achieve the criteria. Second, quotas of recognized titles are set for each school; therefore, in most cases, prizes come to school managers. Teachers have limited opportunities to gain these titles. Third, one of the key evaluation criteria refers to 'innovative experience in teaching', which requires teachers to report on their initiatives on a yearly basis. This criterion is seen as impractical and especially challenging for ethnic minority teachers who use Vietnamese as a second language.

V. Social Management Capacity of the Program

159. As the NTEP is also under preparation for approval, the Program has not implemented many activities, apart from consultations during the preparation and design stages. Some initial issues regarding the social management capacity of the Program that emerged through the consultations are described here.

160. As there are no regulations requiring social assessment and screening as an input to selection and design of activities, adequate attention often may not be paid to social issues at this stage. Although members of staff from the MOET are familiar with consultative practices for Programs and projects, earlier experiences show that consultations are limited to the preparation stage, with participation of local authorities and principals rather than with beneficiary teachers from ethnic minorities and related vulnerable groups. The new regulation, issued by the MOET on August 24, 2015, requires its Department of Planning and Finance to conduct consultations with the related ministries and sectors as well as the related departments, bureaus, and stakeholders under the ministry, without specifically indicating consultations with teachers.

VII. Main Recommendations

161. From a social management perspective, the following measures are recommended.

(a) **Under the Program, complaints of all kinds, which could include allegations of fraud or corruption, should mainly be submitted in writing to the key implementing agencies, which include the MOET and the LTTUs.** Where crimes are alleged, allegations will be passed to the police and prosecutors for handling. In addition to the written complaints channel, any citizen may also attend meeting sessions with the MOET leaders, held at least monthly, to raise issues of fraud and corruption. Staff and students of the NIEM and TTUs can also attend periodic meetings with the agencies' leaders and raise concerns of fraud and corruption. Although government agencies are not required to handle anonymous complaints, all the key implementing agencies maintain the practice of accepting, recording, and giving these complaints some consideration when they contain credible evidence of fraud and corruption.

(b) **The government, through the MOET, the MOET Inspectorate, and other implementing agencies will improve reporting systems and establish a database to strengthen the framework for complaints handling and combat fraud and corruption under the Program.** The government has confirmed its commitment to the implementation of the Guidelines on Preventing and Combating Fraud and Corruption in Program-for-Results financing and will require the application of the Bank's suspension and debarment lists that will be made readily available to participating cities. These actions will be reviewed during Program supervision. In addition, the government will require all Program participants to cooperate with Bank investigations.

(c) The Program implementing agencies have committed to disclose financial information properly and maintain databases on (a) public consultation, corruption, fiduciary, procurement, and Program implementation complaints and responses to those complaints and (b) beneficiary feedback to implementing agencies and responses to such feedback. The information would be aggregated at the national level by the MOET and the MOET Inspectorate and will be reported to the Bank periodically. *These actions are stipulated in the PAP to help enhance transparency and minimize risks of fraud and corruption.*

(d) **Improve the transparency and accountability of implementing organizations through the maintenance of a database on corruption/fiduciary/procurement and Program implementation feedbacks and complaints.** This database should integrate the complaints received by all implementing bodies. The database should include anonymous complaints received where possible. In addition, the database should collect and summarize all actions taken in response to complaints and allegations, including the results of any investigations conducted by investigative bodies in the implementing agencies. The database information should be reviewed and approved by the respective MOET Inspectorate and reported to the Bank annually. The implementing agencies will strengthen grievances and redress mechanisms and their documentation. They will need to develop operational guidance and undertake capacity building to improve conflict resolution and properly track and document all grievances. *Further details of the arrangements for this action should be included in the OM.*

(e) **Early social screening and the participation of the related stakeholders, including beneficiary teachers and principals, especially those from ethnic minorities and vulnerable groups, should be conducted under the Program to maximize benefits and minimize adverse impacts to them.** This would also allow for broader support from the related stakeholders, including those from ethnic minorities, for the proposed investments. Measures should be taken to address the major constraints as identified in this assessment, including less-effective acquisition and utilization of some new approaches and contents under the Program by teachers from various ethnic minority areas across the country; inadequate consultation and participation of beneficiaries from ethnic minorities and other vulnerable groups in the Program activities; poor IT accessibility in some regions and among some target groups; and low motivation to join the Program among some teachers. Particular attention should be paid to the screening activities relating to ethnic minority areas and groups. *Specific information on social screening processes to be used under the Program will be included in the OM.*

(f) **The Program should enhance the consultation with and participation of beneficiaries, including those from ethnic minority groups, in the Program activities.** This should be done in such a way to ensure their meaningful participation and consultation in every step of the Program implementation, including planning, subproject design, and implementation. The MOET should ensure the quality of consultation and participatory processes relating to ethnic minorities. *The PAP will stipulate that the MOET and the participating agencies will jointly develop a guideline to ensure the effective participation of and consultation with beneficiary principals and teachers, including those from ethnic minorities and vulnerable groups, during the implementation process.*

(g) **The Program should carefully consider the potential social-related political and reputational risks when activities under the Program are appraised.** The Program should carefully consider the potential social- and environment-related political and reputational risks when appraising activities in certain areas with similar education enhancement Programs to avoid overlapping and ensure effective synergy.

(h) **The Program should ensure that teacher CPD addresses questions of ethnic minority education, such as how to teach in a classroom with students who are not fluent Vietnamese speakers and/or making provisions for particular training to promote teachers who are ethnic minorities themselves.** To address other concerns relating to the education for ethnic minorities groups, the Vietnam 2035 report³¹ suggested placing teaching assistants who know the local mother tongue in the first few years of primary school to ease the transition for children who do not learn Vietnamese at home.

(i) **The role of Women's Union would be considered to maximize benefits and minimize adverse impacts on beneficiaries, especially those from ethnic minorities and other vulnerable groups.** This should make the Program more successful and socially sustainable. Specific actions are needed regarding how to ensure that there is greater representation of women amongst Core Teachers, Principal Advisors and LTTU faculty. The Women's Union could play an important role here.

³¹World Bank and the Ministry of Planning and Investment. 2016. *Vietnam 2035: Towards Prosperity, Creativity, Equity, and Democracy.*

(j) **Every effort should be made to ensure that students and teachers with disabilities benefit from the Program.** With school-based Core Teachers and Principal Advisors and the LMS, teachers -- whether they are serving disabled children or are disabled themselves -- will have an unequal opportunity to access tools and most importantly support. *The OM will include options for enhancing the accessibility of people with disabilities to the Program.*

CHAPTER 4: ENVIRONMENTAL AND SOCIAL ASSESSMENT AND ACTION PLAN

Core Principle 1: Environmental and social management procedures and processes are designed to (a) avoid, minimize, or mitigate against adverse impacts; (b) promote environmental and social sustainability in Program design; and (c) promote informed decision making relating to a Program environmental and social effects.			
Key Elements	System Requirements	Key Findings	Recommendations
1.1 Program procedures are backed by an adequate legal framework and regulatory authority to guide environmental and social impact assessments at the Program level	The Constitution (Articles 29 and 31) and various laws, including LEP 2014, which provides provisions relevant to the core principles. The new LEP stipulates (a) environmental protection planning, strategic environmental assessment, environmental impact assessment, and environmental protection plans (Chapter II, Articles 8 to 34); (b) environmental protection in the usage and exploitation of natural resources including during the survey, assessment, and planning for natural resources use and biodiversity (Article 29), protection, and sustainable development of forestry forest (Article 36); environmental protection during the survey, exploration, exploitation, and usage of natural resources and mineral resources (Articles 37, 38); (c) adaptation to climate change (Chapter IV), general regulations on climate change adaptation (Article 39), produce and consume environmental friendly products (Article 44); (d) protection of water, air, soil environments (Chapter VI, Articles 52 to 64), environmental protection in production, services and businesses (Articles 65 to 79, environmental protection in urban and residential areas (Articles 80 to 84); (e) waste management, including hazardous waste, municipal waste, wastewater, dust, noise, and vibration	Lack of political will and low capacity of project proponents, contractors, consultants, and appraisal authorities in the implementation of environmental regulations. This results in limited integration of environmental and social considerations in Programs, strategies, and urban master plans.	Support capacity-building Programs, including basic orientation, skills development, and on-the-job trainings for Environmental Divisions. Recruit and maintain a qualified environmental specialist engaged at the central level to provide technical advisory to the LTTU PMUs in the early stage of the Program and to prepare an environmental training plan for the Program. The environmental training plan should cover all key stakeholders, including LTTU PMU environmental officers, construction supervisors, and contractor site engineers.

Core Principle 1: Environmental and social management procedures and processes are designed to (a) avoid, minimize, or mitigate against adverse impacts; (b) promote environmental and social sustainability in Program design; and (c) promote informed decision making relating to a Program environmental and social effects.

Key Elements	System Requirements	Key Findings	Recommendations
	<p>management (Chapter IX); (f) regulations on environmental standard, monitoring and reporting (Chapter XI to XIII); (g) responsibilities of various stakeholders on environmental management, including governmental authorities, civil and mass organizations, communities; (h) resources for environmental protection (Articles 147 to 155); (i) international cooperation on environmental protection; and (j) inspection, handling of violation, settlement of complaints and denunciation related to environment, and compensation for environmental damage (Articles 125 to 134)</p>		
<p>1.2. Incorporate recognized elements of environmental and social assessment good practice, including 1.2a Early screening of potential effects</p>	<p>A screening process is in place and based on the list of projects contained in Decree No. 18/2015/ND-CP and consists of the following categories: (a) strategies, planning subject to detailed strategic environmental assessment (Appendix I, Decree 18/2015); (b) projects that require the preparation of a full EIA (Appendix II, Decree 18/2015); (c) projects subject to EPP with limited environmental analysis; and (d) projects that do not require an environmental assessment. Environmental assessment is conducted early—at the same time as the feasibility study. Decree 18/2015 and Circular 27/2015. Competent environmental authorities review all category A, B, and C projects for their potential impacts and the scope of the EIA or a</p>	<p>All upgrading activities under the Program have reduced or delegated environmental review requirements under the regulatory framework.</p> <p>The small-scale construction activities are only required to prepare EPPs for review by the DPC or CPC Environmental Division and approval is provided by the DPC or CPC.</p>	<p>Ensure that there are competent environmental specialist(s) at the central level to review TORs for environmental assessment.</p> <p>The LTTU PMU should be supported by a competent environmental specialist with relevant background and/or experience to overview the environmental process applied.</p> <p>Where technical review by an independent consultant is arranged, review of EPP should also be included.</p>

Core Principle 1: Environmental and social management procedures and processes are designed to (a) avoid, minimize, or mitigate against adverse impacts; (b) promote environmental and social sustainability in Program design; and (c) promote informed decision making relating to a Program environmental and social effects.			
Key Elements	System Requirements	Key Findings	Recommendations
	limited environmental analysis. SEA (Strategic Environmental Assessment) is mandatory (Article 13 of the LEP); EIA is mandatory (Article 18 , LEP 2014); EPP is required for household-based production, business or service establishments, and entities not defined in Articles 14 and 18 .		
1.2b Consideration of strategic, technical, and site alternatives (including the 'no action' alternative)	Annex 5.5 of Circular 27/2015/BTNMT specifies the contents in each sections of the EPP report. Section I - General information (project name; project owner; project location; project scale; the need for material and fuel) Section II - Adverse environmental impacts (2.1 adverse environmental impact due to wastes; 2.2 adverse environmental impacts not relating to wastes) Section III - Environmental Management Plan Section IV - Commitment	There is often a high degree of reluctance to critically evaluate alternatives from an environmental point of view or carry out any significant modifications to project location or design at this stage.	Design specifications including environmental management considerations
1.2c Explicit assessment of potential induced, cumulative, and trans-boundary impacts	Cumulative impact assessments have not been explicitly required in LEP 2014 and Decree 18/2015. Experiences indicate that most projects usually overlooked or inadequately assessed cumulative effects.	Only generic potential impacts are discussed. Most commonly direct impacts are assessed: assessment of indirect impacts is generally weak. Induced, cumulative and trans-boundary impacts are not covered	Consideration of cumulative impacts with EIA and EPP is a desirable long-term objective. Environmental management can be improved by including, in the bidding documents, environmental clauses to request contractors to reduce negative impacts during construction phase.
1.2d Identification of measures to mitigate adverse environmental or social	Circular 27/2015 provides guidance on the required scope of EIA and EPP documents. It is rather comprehensive and expects typical	Circular 27/2015 does not include requirements for (a) the detailed consideration of	The OM will advise PMUs on ensuring proper construction practices following the Vietnamese Law on Civil Works to

Core Principle 1: Environmental and social management procedures and processes are designed to (a) avoid, minimize, or mitigate against adverse impacts; (b) promote environmental and social sustainability in Program design; and (c) promote informed decision making relating to a Program environmental and social effects.			
Key Elements	System Requirements	Key Findings	Recommendations
impacts that cannot be otherwise avoided or minimized	EIA reports to cover description of the existing environment; description of the project; environmental impact scoping and assessment; and environmental management and monitoring Program, including responsibilities and budget.	socioeconomic impacts; (b) analysis of project alternatives, though description of site selection options is required; and (c) consideration of cumulative and strategic impacts. Practice shows that in many cases, site selection was decided before the EIA or EPP is initiated.	mitigate temporary construction impacts.
1.2e Clear articulation of institutional responsibilities and resources to support implementation of plans	Institutional responsibilities and resources for preparation, implementation monitoring, and inspection are clearly spelled out by relevant regulations (Articles 20 and 21, Decree 18/2015).		Provide technical assistance to strengthen the expertise for the monitoring and inspection agencies to enforce post-EIA/EPP responsibilities of project owners by involving their participation in the Program. Environmental performance indicators on post-environmental assessment compliance can be developed to help the local authorities enforce environmental safeguard implementation. Mitigation measures are to be included in the bidding documents and contracts for the detailed design and construction. Develop mechanisms to strengthen compliance of the project owners to post

Core Principle 1: Environmental and social management procedures and processes are designed to (a) avoid, minimize, or mitigate against adverse impacts; (b) promote environmental and social sustainability in Program design; and (c) promote informed decision making relating to a Program environmental and social effects.

Key Elements	System Requirements	Key Findings	Recommendations
			<p>EIA/EPP responsibilities such as monitoring and reporting with compliance indicators.</p> <p>Contractors failing to fully comply with the environmental obligations stated in the contract could be subject to performance penalties.</p>
<p>1.2f Responsiveness and accountability through stakeholder consultation, timely dissemination of Program information, and through responsive grievance redress measures</p>	<p>Public consultation with relevant stakeholders, local authorities, representatives of communities and organizations directly affected by projects is required (Article 15 for SEA, and Article 20, LEP 2014 for EIA). Guideline on public consultation is provided by the regulation (Article 12, Decree 18/2015). Disclosure of environmental management plan is only granted after approval of EIA or EPP.</p>	<p>The timing and number of consultations are not clearly stated in the EIA regulation. No public consultation is required in preparation of the EPP. No mechanism for access of information with regard to SEA, EIA, EPP.</p> <p>The fact that consultation is conducted through the local government (commune Peoples' Committee) limits objective outcomes of consultation because in most cases the CPC is under pressure from the higher level of government to agree with projects.</p>	<p>Make continuous consultation with local communities a requirement under engineering design contracts.</p> <p>LTTU PMUs should encourage local counterparts to disclose information pertinent to the Program on public websites or other information sources.</p> <p>The LTTU PMU should be instructed to coordinate with local authorities to arrange for community monitoring.</p>

Core Principle 2: Environmental and social management procedures and processes are designed to avoid, minimize, and mitigate against adverse effects on natural habitats and physical cultural resources resulting from the Program.			
Key Elements	System Requirements	Key Findings	Recommendations
2.1 Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas		<p>This ESSA details the areas within participating LTTUs of potential importance for biodiversity or cultural resources.</p> <p>Preliminary identification of subprojects within the Program can be screened against the very limited areas of potential interest.</p> <p>Although there is no clear legal guidance on the application of these criteria, they will apply within the Program context.</p>	There is a need to improve the screening criteria for certain activities under the Program. More detailed initial guidance will be developed for the Program, in which the activity type, scale, location, sensitivity, and the nature and magnitude of potential impacts will be identified to classify the proposals.
2.2 Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or Program activities		In fact, no activities supported under the Program will impinge on natural habitats.	The EIA and EPP should identify potential risks to habitats and the EMP should include explicit requirements for avoidance and minimizing habitat loss and post construction rehabilitation.
2.3 Takes into account potential adverse effects on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects.		The scope and nature of the activities under the Program is such that adverse effects on physical cultural property can usually be avoided.	

Core Principle 3: Program procedures ensure adequate measures to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the Program and (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials.

Key Elements	System Requirements	Key Findings	Recommendations
3.1 Ensures adequate community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed	<p>There is adequate legal framework for the protection of public and worker safety against potential risks. Regulations related to these issues available in various laws such as Vietnam Labor Codes 1994.</p> <p>Decree 06/ND-CP dated January 20, 1995, elaborating some provisions of the Vietnam Labor Law on occupational safety and health stipulates that, “employers provide the workers with sufficient personal protective devices and to carry out other measures ensuring occupational safety and health for them in conformity with laws and regulations.”</p> <p>Decree 110/2002/ND-CP dated December 27, 2002, on amending and supplementing a number of articles of Decree 06/ND-CP dated January 20, 1995, elaborating some provisions of the Vietnam Labor Law on occupational safety and health.</p>	Workers health and safety is not considered a priority issue to the contractors in ongoing road/ bridge projects. Experiences in the ongoing construction projects also support the above observations.	<p>Incorporation of legal requirements into contracts and contract supervision to mitigate against the associated risks;</p> <p>Closer monitoring of construction activities; increase capacity to enhance environmental performance of contractors relating to worker health and safety</p>

Core Principle 4: Land acquisition, displacement and loss of access to resources is avoided or minimized; and affected people are assisted in improving, or at least restoring, their livelihoods and living standards

Key Elements	System Requirements	Key Findings	Recommendations
4.1 Avoid or minimize land acquisition and related adverse impacts.	n.a.		n.a.
4.2 Identify and address all economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy.			

Core Principle 4: Land acquisition, displacement and loss of access to resources is avoided or minimized; and affected people are assisted in improving, or at least restoring, their livelihoods and living standards			
Key Elements	System Requirements	Key Findings	Recommendations
4.3 Provide prior compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses paid before taking of land or restricting access.			
4.4 Provide supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (for example, loss of crop production or employment).			
4.5 Restore or replace public infrastructure and community services that may be adversely affected.			

Core Principle 5: Due consideration is given to cultural appropriateness of, and equitable access to, Program benefits, with special emphasis provided to rights and interest of indigenous peoples, as well as the needs or concerns of vulnerable groups			
Key Elements	System Requirements	Key Findings	Recommendations
5.1 Free, prior, and informed consultation are undertaken if indigenous people are potentially affected (positively or negatively) to determine whether there is broad community support for Program activities.	Decree No. 05/2011/ND-CP of January 14, 2011 on activities related to ethnic minorities specified various kinds of support for the maintenance of language, culture, customs, and identities of these groups (Article 3).	While the legal framework is robust, the implementation of the regulations related to ethnic minorities, information disclosure, and information and social participation at the local level is not consistent with the policy. In particular, there is a lack of accountability due to limited information flowing to teachers, especially in mountainous and remote regions where ethnic minority groups reside. Consultations are limited to the preparation stage, with participation of local authorities and principals, rather than beneficiary teachers, especially those from ethnic minorities and	The MOET and participating agencies should jointly develop a guideline to ensure the effective participation of and consultation with beneficiary principals and teachers, including those from ethnic minorities and vulnerable groups, during the implementation process. With respect to ethnic minorities through a process of free, prior, and informed consultations.

Core Principle 5: Due consideration is given to cultural appropriateness of, and equitable access to, Program benefits, with special emphasis provided to rights and interest of indigenous peoples, as well as the needs or concerns of vulnerable groups			
Key Elements	System Requirements	Key Findings	Recommendations
		related vulnerable groups.	
5.2 Ensure that indigenous peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter to include the consent of indigenous people.	n.a.	n.a.	n.a.
5.3 Program planning and implementation includes attention to groups vulnerable to hardship or disadvantage, including, as relevant, the poor, the disabled, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to Program benefits.	This element is fully covered under the existing policy framework of Vietnam. This Program targets principals and teachers, including those from ethnic minorities and vulnerable groups, across the country, to facilitate accessibility to professional services to enhance their effectiveness.	No significant gaps	

Core Principle 6: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.			
Key Elements	System Requirements	Key Findings	Recommendations
6.1 Considers conflict risks, including distributional equity and cultural sensitivities	n.a.	n.a.	n.a.

CHAPTER 5: CONSULTATION WITH KEY STAKEHOLDERS AND DISCLOSURE

I. Introduction

162. The Bank conducted the ESSA consultation mission from November 9–18, 2015 for the Program covering seven TTUs and the NIEM in Hue, Da Nang, Vinh, Thai Nguyen, Ho Chi Minh City, and Ha Noi City. The mission comprised Ms. Dung Kieu Vo (co-Task Team Leader), Mr. Khang Van Pham (Environmental Specialist), and Mr. Giang Tam Nguyen (Social Development Specialist) and representatives of the MOET.

163. The purpose of the consultation workshops was to (a) brief participants on the ESSA approach under the proposed PforR operation; (b) solicit feedback on the key findings and recommendations of the ESSA; and (c) identify possible recommendations for the proposed action plan.

164. The consultation mission conducted intensive discussions and consultation with key stakeholders including the LTTUs and representatives from the Division of Environment under the DPC/CPC, especially focusing on the ESSA and the recommendations. The ESSA has been prepared in English and Vietnamese. Hard copies of the document were also shared with all key stakeholders. Before consultations, all participants received the summary of the ESSA and related documents, including presentation handouts provided by the MOET and the Bank.

165. Consultations with key stakeholders during implementation will be conducted by the MOET and LTTUs for specific Program activities in line with the National Environmental Protection Law (Procedure for Public Consultation).

II. Presentation

166. Consultations were divided into two parts, presentation and discussion. The presentation made by the representative of the Bank's team introduced the PDO, Program design, and budget and investment mechanism and focused on the ESSA (rationale, design, findings, and recommendations). The team emphasized that the social and environment benefits of the proposed Program would be more significant than the potential risks. The Bank team also presented proposals for a capacity-building Program to fill in the weaknesses and an action plan to address the gaps in capacity of the government's existing system in managing social and environmental issues in the Program activities.

III. Discussions

167. The Bank's team had an opportunity to get verbal and written feedback from the participants. Stakeholders expressed their strong support for the implementation of the proposed Program. Some of the proposed investments would help address the need for infrastructure upgrading of universities. Participants had express several recommendations that are summarized below.

A. Environmental Recommendations

- Upgrading cost should include cost for greening measures such as planting green trees and landscaping.

- Upgrading cost should include cost for building waste treatment system, especially wastewater from laboratories.
- Environmental capacity building needs to be provided to staff of the PMU at an early stage of the Program.

B. Social recommendations

168. Below are some key recommendations for the Program design from the consultations.

To address adverse effects in terms of gender and ethnicity

- IT support staff are recommended to provide on-site support for teachers to ensure successful implementation of e-learning professional development Programs. The social assessment findings suggest that younger staff tend to be more IT literate and, therefore, would be more suitable for this task. Alternatives should be considered for a small number of ethnic minority teachers who do not have access to the Internet.
- Consensus should be reached among teachers about the one who is selected as core teacher as this is pivotal to the success of the Program. Therefore, it is strongly recommended that teachers' opinions are collected, possibly by voting.
- In schools where a majority of students is ethnic minorities and there are many EM teachers, authorities are encouraged to select EM teachers to be Core Teachers.

Selection of Core Teachers

169. Analytical work will be undertaken to define rules/regulations for the selection, roles, responsibilities, and incentives of core teachers and core principals. The surveys that the ministry conducted in Dak Lak and Yen Bai in preparation for this Program suggest the following:

- Both head and vice head of subjects at schools are deemed best for the core teacher position.
- Teachers between the age of 30 and 40 seem to be more motivated—with classroom innovation and IT savvy—to best take on the core teacher roles.
- School managers selected for professional development Programs should include both school principals and deputy principals in charge of academic issues. One core teacher per school is strongly recommended to provide adequate needs-based professional development support for teachers with relevant principal/vice principal endorsement.

Availability of time and facilities

- E-courses/e-classes should be downloadable, so that some teachers at a school can download the clips/videos/materials to share, through memory sticks, with other teachers who do not have access to the Internet.

- One option is that Core Teachers download training materials and teaching literature and share with colleagues who do not have Internet access, for offline use.
- As most of the personal computers or laptops at the schools serve the management and/or are used for administrative purposes, procuring additional personal computers for needy schools may be a consideration.
- Partnership with Internet service and hardware providers is advisable in enhancing Internet connectivity to disadvantaged schools and villages and providing subsidized service packages for needy teachers.

Teacher evaluation criteria and mechanism

170. At the time the MOET reviews teacher professional standards across different education levels and the application of standards and their evaluation at provinces, the following social assessment findings are recommended to be taken into account:

- There is a gap in the perception of ethnic minority teachers and school managers about evaluation and appraisal practice. The problem can lie in the communication between them. Ethnic minority teachers may not receive adequate explanation or communication regarding this issue. This is a matter to be noted for school managers in the management of schools.
- There should not be any forms of favors in the evaluation of teacher performance for ethnic minority teachers. It is critical that the evaluation criteria and results be explained and the evaluation process is transparent.
- However, there should be differentiation in the criteria for evaluation of school and teachers' performance between regions, considering the difficulties each area faces, for example, the high rate of indigenous ethnic minority students with low socioeconomic status and low level of cognition.
- This criterion—innovative teaching experience—should be optional. Where ethnic minority teachers have difficulties in writing an innovative teaching experience report, language support should be provided by peer Kinh teachers.

Internal communication within the education sector

- Communication via e-channels is necessary.
- The Program should review the existing ICT solutions in teacher professional development, including, among others, the MOET's Education Management Information System (EMIS) and the Connected School System, to take advantage of the software, avoid redundancy and overlapping, and avoid teachers' neglect due to multiple systems and accounts. A unique identifier for each teacher is strongly recommended.
- Before implementing the Program, it is essential that a nationwide survey on the deployment of the Connected School System be conducted. A survey on the application of such an OMS in all provinces is also necessary.

- The organization of teacher training courses and workshops should be well-designed and prepared so as to avoid the problems of existing courses and Programs.

Incentives or support mechanisms for teachers to ensure maximum teacher participation in the Program

- Case-by-case provision of personal computers for use at school for teachers in need, on the basis of actual local conditions.
- Teachers' proposals regarding incentives and supportive mechanisms should be considered.

IV. Disclosure of the ESSA

171. The final ESSA has been disclosed at the Bank's InfoShop and in-country in public places in a form and language that are understandable and accessible to key stakeholders.

Annex: List of Participants in Public Consultations

World Bank Team

	Name	Title	Organization
1	Dung Kieu Vo	Co-Task Team Leader	World Bank
2	Khang Van Pham	Environmental Specialist	World Bank
3	Giang Tam Nguyen	Social Development Specialist	World Bank

Participants

Consultation with NIEM on November 18, 2015		
1	Mr. Hung	Vice Director
2	Mr. Hoan	Vice Director
3	Ms. Hang	Division of Material Facilities
4	Ms. Hong	Division of Finance and Planning
5	Mr. Thang	Division of Finance and Planning
6	Mr. Kien	Division of Personnel
7	Mr. Hoang	Environmental Officer of Division of Environment under Thanh Xuan District People's Committee
8	Ms. Duong	Staff of NIEM
9	Ms. Giang	Staff of NIEM
Consultation with Thai Nguyen University of Education on November 17, 2015		
1	Mr. Hung	Division of Administration
2	Mr. Tien	Division of Administration
3	Mr. Nam	Division of Training
4	Mr. Ich	Environmental Officer of Division of Environment under Thai Nguyen City People's Committee
Consultation with Ho Chi Minh City University of Education on November 16, 2015		
1	Ms. Hong	Vice Rector
2	Mr. Trung	Division of Training
3	Ms. Nhan	Environmental Officer of Division of Environment under District No.5
Consultation with Vinh University of Education on November 14, 2015		
1	Mr. Khanh	Vice Rector
2	Mr. Khoi	Division of Administration
3	Mr. Cuong	Division of Training
4	Ms. Hue	Environmental Officer of Division of Environment under Vinh City People's Committee
Consultation with Hanoi 1 University of Education on November 12, 2015		
1	Mr. Minh	Rector
2	Mr. Hoan	Division of Administration
3	Mr. Long	Division of Personnel
4	Ms. Huong	Division of Finance and Planning
5	Mr. Lam	Division of Science and Technology
6	Ms. Yen	Deputy Manager of Division of Environment under Cau Giay District
Consultation with Hanoi 2 University of Education on November 12, 2015		
1	Mr. Tien	Rector
2	Mr. The	Division of Training
3	Mr. Tuan	Division of International Relations
4	Mr. Cuong	Division of Post Graduate
5	Mr. Quang	Division of Administration
6	Mr. Dung	Environmental Officer of Division of Environment under Phuc Yen Town

Consultation with Da Nang University of Education on November 11, 2015		
1	Mr. Son	Vice Rector
2	Mr. Minh	Division of Training
3	Mr. Trung	Division of International Relations
4	Mr. Hung	Division of Material Facilities
5	Mr. Thanh	Division of Administration
6	Mr. Vu	Division of Administration
7	Mr. Ha	Environmental Officer of Division of Environment under Lien Chieu District
Consultation with Hue University of Education on November 10, 2015		
1	Mr. Tham	Rector
2	Mr. Thuan	Vice Rector
3	Mr. Lam	Division of Finance and Planning
4	Mr. Vui	Division of Science and Technology and International Relations
5	Mr. Thuc	Information Technology Centre
6	Ms. Hanh	Library
7	Mr. Dung	Division of Post Graduate
8	Mr. Son	Deputy Manager of Division of Environment under Hue City