



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 11/17/2022 | Report No: ESRSC03127



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Moldova	EUROPE AND CENTRAL ASIA	P179363	
Project Name	Education Quality Improvement Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	3/15/2023	5/31/2023
Borrower(s)	Implementing Agency(ies)		
Republic of Moldova	Ministry of Education and Research, National Office for Regional and Local Development, Ministry of Education and Research, National Office for Regional and Local Development (NORLD)		

Proposed Development Objective

The Project Development Objective is to improve quality of education service delivery in Moldova, with an emphasis on disadvantaged students.

Financing (in USD Million)

Amount

Total Project Cost	40.00
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B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

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

Component 1: Enhance teacher effectiveness for student learning (US\$5.0 million IBRD; tentatively US\$5.0 million GPE).



Sub-component 1.1 – Increase teacher effectiveness for student learning: includes pre-service and in-service teacher training programs, assessment of classroom teaching practices using Teach classroom observation tool to increase teacher effectiveness in classrooms (improve learning culture, deepen student understanding and critical thinking; foster socioemotional skills, inclusive teaching), coaching program for teachers' skills enhancement, training on teacher professional standards;

Sub-component 1.2 – Support innovations in teaching, learning loss recovery and accelerated learning, with the focus on disadvantaged students through Innovation Grants to schools for small projects by teachers to support innovations in teaching and promote results for disadvantaged students (girls participation in Science Technology Engineering and Mathematics (STEM), student assessment and feedback; digital tools for active and collaborative learning, innovative materials, exchange experiences); support for least performing students (initially piloting for 100 students, bottom 20%) through tutoring, remedial programs for accelerated learning, use of student-level Education Management Information System (EMIS) data on vulnerabilities status and performance; rapid assessments in reading and math to identify learning gaps;

Sub-component 1.3 – Increase teacher motivation and attractiveness of teaching as a profession through Systems Approach for Better Education Results (SABER) Teachers Framework to determine the role of teacher policies in promoting teacher effectiveness, linking career opportunities and teacher compensation with performance, alternative teacher motivation mechanism, pilot programs for certification and remuneration.

Component 2: Improve the quality and resilience of physical and digital learning environments in targeted schools (US\$30.0 million).

Sub-component 2.1 – Build model high schools including FS and design for hub high schools, construction works and provision of equipment for classrooms, canteens, sports facilities and dormitories, specific number of schools would be determined based on the available resources and needs;

Sub-component 2.2 – Strengthen schools' resilience including science laboratory and IT equipment, STEM laboratory equipment, furniture, and related learning materials for general education schools, targeted schools will be selected from across the country, considering the needs, identification studies, needs assessment and teacher training.

Component 3: Strengthen Early Childhood Development (ECD) service provision ((subject to ELP TF financing of up to US\$ 10 million).

Sub-component 3.1 – Improve the quality of ECD service provision through assessments, includes quality assessment of ECD service providers, assess resilience of ECD facilities against disaster risks;

Sub-component 3.2 – Improve access to and quality of ECD services in targeted centers through provision of indoor and outdoor teaching and learning and play materials (including in Ukrainian language such as Romanian-Ukrainian ECD learning materials developed by the UNICEF), development of Teach ECD digital training platform for teachers and school leaders, implementation of in-service teacher training, minor rehabilitations including WASH facilities;

Sub-component 3.3 – Enhance private provision of ECD services through review of relevant regulations that would allow to expand access to ECD, accreditation of eligible private sector providers of ECD services, performance-based conditions for increased service delivery from accredited private sector providers of ECD services;



Component 4: Support capacity building and project management (US\$5.0 million).

Project management activities including project supervision, procurement and financial management (FM), social and environmental management, monitoring and evaluation, verifications, and essential communications strategy.

Component 5: Contingent Emergency Response Component (US\$0).

Support the country's future response if the current emergency situation persists, or if a new unexpected emergency arises, following the procedures governed by paragraph 12, Section III of the Bank Policy, Investment Project Financing (IPF) on Projects in Situations of Urgent Need of Assistance or Capacity Constraints.

Relationship to Country Partnership Framework (CPF): The proposed project is fully aligned with the current FY18-21 CPF, which supports the country's transition towards a new, more sustainable, and inclusive development and growth model, by focusing on the following priority areas: economic governance, service governance, and skills development, complemented as a cross-cutting theme by climate change adaptation and mitigation—a World Bank Group corporate priority. It is also in line with the current draft FY23-27 CPF while being anchored in the GoM's National Development Strategy "European Moldova 2030" and aligned with the government's agenda towards European Union aspiration. While the current CPF is in draft form, the Human Development agenda is an ongoing pillar of the World Bank and GoM's partnership, requiring constant efforts to build a productive and resilient human capital. The current project would build on and enhance the results of the Moldova Education Reform Project (P127388) and its Additional Financing (P156657) closing on December 31, 2022.

D. Environmental and Social Overview

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

The project will be implemented nationwide and exact locations will depend on selection of subproject activities but are likely to involve physical infrastructure investments in Chisinau and potentially in other towns such as Balti, Cahul, Comrat and Taraclia.

The project's interventions are designed to involve substantial contributions to equity in access and quality improvements to education for the most underserved and vulnerable segments of the population, specifically poor rural children, persons with disabilities, and refugee children. Indirect benefits include enabling women who would otherwise be unpaid caregivers to participate in the labor market. Despite this the project activities are being implemented in a challenging context. Construction would likely be limited to two to three specific sites and likely in more densely populated urban or town areas and involving interactions with local road traffic and population movements, especially young people if construction takes place within or close to education facilities that are being used. The creation and implementation of new high school hubs brings vulnerable students together including children with disabilities who may have previously been institutionalized and separated from mainstream education. Ability to gain physical access to facilities, easy egress in event of emergency, and ability to benefit from learning opportunities customized to specific needs are key challenges for persons with disabilities. These hubs may include dormitory accommodation for students whose parents or caregivers may have migrated abroad for work. This context poses child protection, social inclusion, and gender-based violence GBV risks especially for refugee children, those with disabilities, and those from poor rural settings. Early education child protection risks also need to be considered in the promotion of private sector engagement.



The COVID-19 pandemic and the outbreak of war and the Russian invasion of neighbouring Ukraine have accelerated an already existing process of economic contraction and pressure on rural livelihoods. The war has generated an unprecedented refugee crisis, particularly for vulnerable women, children and other dependents who fled to neighbouring countries or have been internally displaced. More than 670,000 refugees from Ukraine – mostly women, children and older people – have crossed into Moldova since the start of the conflict in late February and approximately 80,000 remain in country.

Significant inequity in access to pre-school and quality high school education exists between rural and urban parts of the country. Despite an increase in the number of children with special education needs in mainstream schools since 2012, some 709 children with disabilities still attend special schools. For those in mainstream schools, at the moment, major challenges for successful inclusion and quality learning outcomes are teachers' limited capacities to provide efficient individualized support and lack of relevant technologies for such a support in schools. Gender disparities such as in enrolment in STEM field, as well as in employment and asset ownership, represent barriers to better economic opportunities for women of Moldova.

D. 2. Borrower's Institutional Capacity

The Ministry of Education, and Research (MoER) will be the main project implementing agency. MoER has experience with the preparation and implementation of projects supported by the World Bank including the current Moldova Higher Education Project (P167790) under the Environmental and Social Framework (ESF) and Moldova Education Reform Project (P127388) under the safeguards policy. Both projects had a satisfactory E&S performance during the implementation of these projects. Three specialists from these existing education operations (one environment, one social and one procurement specialist) have undertaken the Bank's ESF training course. This new operation in particular will require training and experience in engagement with vulnerable stakeholders and interest groups in order to ensure that they are included in project benefits and any adverse impacts are prevented and addressed. Construction activities for the operation are to be undertaken and managed by the National Office for Regional and Local Development (NORLD) – the successor of the Moldova Social Investment Fund – which will be responsible for all subcontracting, reporting and fiduciary arrangements. The Borrower's capacity to manage these risks will be assessed during the project preparation and project specific training and hiring needs will be identified for construction-related and institutional operational activities, including E&S specialist roles in supervision contracts. The Borrower will require the presence of a qualified social specialist, a qualified environmental specialist and a qualified OHS specialist in the Project Implementation Unit (PIU). The task team will also identify capacity building needs for beneficiary institutions, especially those new high school hubs created by the project which may become operational during the life of the project.

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The Project's environmental risks are anticipated to be moderate. The moderate risk rating will be reassessed during project preparation, once more information on the scale of construction becomes available, as construction works could result in generation of significant waste and OHS related risks. Although the long-term impacts of the Project



are likely to be positive, its activities carry several risks that are mainly generated by the activities under Component 2. The potential environmental risks are mainly associated with civil works for the construction of the high school hubs, with site-contained pollution and controlled flows of construction waste. The environmental risks associated with these works are classified as moderate under the World Bank ESF. The moderate risk rating is proposed because the likely impacts will be site specific, limited to the immediate surroundings and can be managed through the implementation of cost-effective mitigation measures. At this stage of preparation, the specific locations where physical works will take place are yet to be identified, but based on the project description of the possible activities, key environmental and social issues will be related to (i) waste management related to the new construction, (ii) health and safety of workers, during the construction phase, (iii) discomfort of neighbours (to be identified) as a result of air and noise pollution during construction, (iv) erosion from earth works and run-off, (v) impacts on water quality and quantity, (vi) handling of dangerous substances during operation of Science/chemistry labs which need to be carefully monitored to respect all OHS and Good laboratory practices etc. However, no large scale and/or irreversible adverse impact, direct or indirect, is expected to occur from activities under the proposed project. No adverse impacts such as, impacts on biodiversity and habitats are expected. The Client has good experience with the previous projects on the Bank's safeguards and ESF Potential training could be further required to build the capacity on the application of the Environmental and Social Standards (ESS). The above specified environmental risks will be managed through robust and well-implemented mitigation measures, which will be outlined in the Project's Environmental and Social Management Framework (ESMF) that will be prepared by MoER and NORLDE. The ESMF will clearly set out the environmental and social assessment requirements of the activities under component two and provide guidance on the preparation of site-specific Environmental and Social Management Plans (ESMPs) and/or checklists, as well as the Contractors' Codes of Conduct. ESMF will refer to activities that can be addressed with good engineering and construction practices, as well as by preparing and implementing adequate mitigation measures and applying the adequate work-related health and safety practices (OHS aspects) during construction both for the construction workers and the related communities. As the project will also include Contingent Emergency Response Component (CERC), the ESMF will respectively provide for environmental and social guidelines and an exclusion list of activities that cannot be financed for such emergency cases.

Social Risk Rating

Moderate

The project's social risk rating is assessed as moderate. The project's interventions are designed to involve substantial contributions to equity in access and quality improvements to education for the most underserved and vulnerable segments of the population, specifically poor rural children, persons with disabilities, and refugee children. Indirect benefits include enabling women who would otherwise be unpaid caregivers to participate in the labor market. Despite this there are some social risks involved including the potential for minor land acquisition that needs to be confirmed by further screening during preparation once already available state lands are selected. Construction would likely be limited to two to three specific sites and involve common and manageable community and worker health and safety issues associated with building, movement and use of machinery and interactions with local road traffic and population movements. The creation and implementation of new high school hubs and use of dormitory accommodation brings vulnerable students together posing child protection, social inclusion, and gender-based violence risks especially for refugee children, those with disabilities, those from poor rural settings, Roma children and LGBT children but with available measures these risks are likely to be preventable. Principles of universal access will inform the design and operation of these new high school hubs in terms of physical access, safety and emergency egress, and access to learning opportunities in order to ensure inclusion and safety of persons with disabilities. Alternative teacher motivation actions will require a well-functioning grievance mechanism and engagement with teacher associations. Early education child protection risks also need to be considered in the promotion of private



sector engagement. Cases of violence against children in Moldova are reported by teachers and school managers, and registered by police. Violence between children at school is also reportedly fueled by social norms and prejudices and involves bullying, cyber-bullying and gender-based violence. Assessment of GBV risk will be undertaken and preventative actions along with awareness raising activities, identification of relevant GBV services, a procedure for reporting allegations and an accountability and response framework will be described in the Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Action Plan to be included as part of the ESMF.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The proposed project will support teacher capacity building, inclusion of vulnerable students, construction of new schools and provision of equipment, and support for private sector early education providers to expand their services. Component 1 (teacher effectiveness) will support teacher training and skill development to support critical thinking and cultural and socio-emotional skills development, innovation grants to promote participation in STEM for vulnerable groups, learning recovery for least performing students and those with vulnerabilities status (disabilities, poor households), and promote and pilot new policies for performance-based teacher remuneration. The component also delivers non-discrimination teacher training and tailored materials that can benefit vulnerable groups such as Roma, Ukrainian refugee children, and the disabled to prevent bullying and promote emotional skills. Component 2 (learning environments) will involve construction and resourcing of several high school (hub schools) including classrooms, canteens, sports facilities and dormitories, and provision of laboratory, IT and STEM equipment and materials for selected schools. Component 3 (early childhood services) involves assessment of existing early childhood education providers (kindergartens, daycare), provision of teaching materials, digital training, minor renovations for WASH facilities, and review regulatory incentives for an increase in number of private sector service providers through accreditation and performance conditions.

Potential adverse environmental impacts are also anticipated. These include civil works associated environmental impacts which would be limited both in time and site location and typically include: waste, dust and noise pollution during the construction period, disturbance on existing traffic flows, occupational health and safety (OHS) aspects for the workers. As the exact locations of the high school hubs are not yet disclosed, no detailed environmental analysis could be done so far. Given that the land use and activities will take place in a city environment, there will be no disturbance to wildlife or biodiversity loss. The design will need to include latest technology such as nearly zero-emission building (nZEB) standards, using solar panels (to be sourced from regional markets and screened for supply chain concerns) for producing electricity and high standard insulation materials in order to reduce the operational cost of the buildings and protect the environment. All potential environmental risks and impacts are predictable, expected to be temporary and reversible, low in magnitude, and site specific. The expected environmental impacts may include also health impacts related to inadequate handling and disposal of potentially dangerous materials such as toluene-based paint/solvents and toxic chemicals, etc. Considering that the project's civil works will mainly be undertaken in urban premises, it is critical that the health and safety of both workers and nearby communities are maintained throughout the construction phase.



Potential adverse social impacts include economic and physical displacement as a result of the need to acquire new land for the construction of hub high schools in more densely populated urban areas and towns. Risk of exclusion, neglect or abuse associated with the treatment of vulnerable stakeholders including refugee children, Roma and LGBT children, children with disabilities, and children who are separated from families will require preventive and mitigation measures integrated into the operation of the new high schools and legal obligations of companies providing early education and day care. There is risk that poor design quality will result in the exclusion of persons with disabilities from being able to attend school and participate in learning opportunities. Restrictive physical design of facilities may prevent persons with disabilities from attending and they may also be restricted from accessing learning activities inside the classroom if customized teaching methods and tolerance of error are not applied. In the event of emergency, physical designs and emergency response plans also need to factor in the safety and ease of egress for persons with disabilities. Special measures would need to be taken to ensure the privacy, security and safety of children with disabilities residing in dormitory accommodation. The project plans to select from among the least performing students for piloting special tutoring and remedial education as well as new programming to support students with disabilities. Operational activities do not include mechanisms to address the underlying barriers for Roma children (poverty, poor housing and health, access to jobs, social protection) but new high school hubs and daycare facilities will promote equal opportunity and rights to education and involve teacher training that promotes inclusion through non-discrimination against ethnicity, anti-bullying and emotional skills. More than 35,000 children in Moldova are separated from care of both parents who migrate for work. A modern history of centralized institutional services for children with disabilities rather than provision of community-based support services has increased risk of neglect and abuse. This operation makes positive interventions to reduce risk of abuse by encouraging the relocation of children from institutions to mainstream schools. The project will also promote and pilot alternative teacher motivation mechanism to attract younger teachers. This will improve working conditions but may also come with risk of industrial dispute with older teachers who currently dominate multiple roles and consider younger teachers as challengers.

Since the details of most of the sub-project sites are not yet known, these risks and impacts will be addressed in an Environmental and Social Management Framework (ESMF). The ESMF will provide selection, screening and assessment criteria will inform the design and operation of new high school hubs and promotion of private sector early childcare, identifying and proposing measures to address typical E&S risks likely to occur during the project implementation as well as risk of exclusion or non-participation, social protection and other needs for targeted assistance associated with vulnerable children. The ESMF will specify the legislative and regulatory framework, describe procedures and outline site-specific Environmental and Social Management Plans (ESMPs). Following the identification of specific locations and design of facilities, the client will prepare site-specific Environmental and Social Impact Assessments (ESIA) and ESMPs in accordance with World Bank Environmental, Health, and Safety (EHS) General Guidelines, which will address specific E&S impacts and determine adequate mitigation measures. The ESMF will provide monitoring requirements as well as roles and responsibilities for ensuring effective implementation throughout the project lifecycle. The project includes a Contingency Emergency Response Component (CERC) which would draw on uncommitted loan resources under the proposed project to cover emergency response. The activities financed by the CERC will be demand and event-driven and detailed in an action plan. An addendum to the project ESMF will be prepared to describe the procedure for screening, assessing and managing CERC activities once request has been received by the Government of Moldova to activate the CERC. The ESMF will be prepared, disclosed and consulted upon prior to Appraisal alongside Labor Management Procedures (LMP), a (SEP) including a project



Grievance Mechanism (GM). Actions to be undertaken during implementation will be codified in an Environmental and Social Commitment Plan (ESCP).

Areas where “Use of Borrower Framework” is being considered:

The Borrower’s framework will not be used for the project. However, the proposed operation will comply with relevant national legal and regulatory requirements.

ESS10 Stakeholder Engagement and Information Disclosure

Key project-affected stakeholders are likely to be vulnerable children from poor rural backgrounds especially those whose parents are working abroad, disabled children especially those with history of institutionalization in specialized centers that have separated them from the mainstream student population, refugee children many of whom may be suffering the psycho-social effects of war and whose education has suffered. Other key affected stakeholders include parents of young children especially women who could join the workforce if they are able to benefit from daycare, and those who are working overseas but whose children stand to benefit from the project. They also include teachers, especially early career teachers seeking to establish themselves and more experienced teachers who may react negatively to performance-based incentives. They include workers on high school (hub school) construction sites, especially local area workers who will seek unskilled positions, and local communities who may be affected by pollution and other health and safety risks during the course of construction activities. In the event that land acquisition is determined to be necessary, affected parties include land users on existing state land regardless of legal status, and landowners where private land may be required. Measures should be taken to ensure that refugees from the regional crisis associated with the war in Ukraine are not disproportionately affected, either by exclusion from benefits or by relocation associated with the need to identify sites for the construction of high school hubs. Interested parties who may influence the outcome of project activities and have voice on environmental and social risks and concerns include school administrations, private sector commercial daycare providers, parent-teacher associations, teachers associations and other education action groups and civil society organizations that may organize and submit grievances associated with the design and implementation of project activities as they affect the groups they represent.

Subproject stakeholder identification and engagement should be integrated into the identification, preparation and implementation process managed by the PIU and described in the SEP. The process of engagement should correspond with decision-making on the selection, design and implementation of construction works and involve meetings of affected stakeholders (at least a preliminary consultation during design of the Environment and Social (E&S) tools listed in this document and a consultation meeting on the final drafts) prior to confirmation of construction sites. Similar consultation processes should be designed for the preparation of management plans for the operation of new high schools (model hub schools) and inform the regulatory enhancements required to promote expansion of private sector early childcare facilities. The PIU will prepare an overall project SEP by Appraisal which will identify potential project-affected and other interested parties and will outline measures for engagement with these stakeholders based on their interests. The SEP will be prepared based on preliminary consultations with stakeholders. Its analysis will inform and be aligned with the environmental and social risk assessment and mitigation planning undertaken to prepare the ESMF and LMP. The SEP will specify the institutional roles and responsibilities, timeline, and budget for conducting the stakeholder engagement. The PIU will establish a project-level GM and maintain it throughout project implementation dedicating sufficient resources, and staff time to GM management. A dedicated mechanism will be prepared with appropriate procedures and capacity to handle complaints associated with



SEA/SH including referral to specialist national service providers. The PIU will compile an annual report summarizing stakeholder engagements, and implementation of the grievance mechanism. This report will provide a summary of all public consultation issues, grievances received and progress of resolution. Stakeholders should be provided with awareness information on the availability of the grievance mechanism and its potential uses. The GM will be publicly disclosed, revised and updated.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

Medium-sized workforces ranging from dozens to a few hundred workers are expected on new school construction sites. While the project owners will likely seek to give preference and maximize participation of local workers who live in the towns and villages closest to these sites there may also be requirement for moderate numbers of skilled international laborers to work on technical design and supervision aspects and provide services for installation of specialized equipment. There is unlikely to be a need to establish workers camps for these subprojects since they are designed to be located in existing regional urban centers and maximize local labor opportunities. However, if such camps are deemed necessary once sites have been selected then associated camp management procedures will be prepared including for worker accommodation. There is no intent to use voluntary community labor for implementation of activities. The project would source labor and construction materials locally where possible. Subprojects are not expected to involve significant risks to labor rights, health and safety of employees, or child or forced labor which would be prohibited from financing. Project labor will include direct workers and consultants working for the PIU. All Government staff participating in the project from national to local level will remain subject to their current terms and conditions. As project beneficiaries, teachers remain subject to existing public sector terms and conditions. Private sector workers in early childcare facilities are also considered beneficiaries of the regulatory reform and incentivization of expansion of early childcare services. They will be subject to national labor requirements and any child protection regulations deemed necessary will be included in SEA/SH action plans for high schools (model hub schools) and contractual provisions associated with the participation of private companies in project benefits associated with early childcare service provision. Given the direct working relationships with vulnerable stakeholders it will be important for such provisions to describe vetting of staff who will be working in direct contact with vulnerable children through background character reference checks in addition to appropriate Codes of Conduct (CoC) to prevent violence, mistreatment or discrimination being caused or exacerbated by the range of stakeholders working on the project activities.

Moldova's legal frameworks for core labor standards, including freedom of association and collective bargaining, prevention of forced and child labor (minimum working age is 16), discrimination and equal opportunity, and occupational health and safety are broadly consistent with international standards. However, labor is in chronic shortage in Moldova and this has been exacerbated by the COVID-19 pandemic. Weaknesses are recognized in the enforcement and inspection of non-compliances by the labor inspectorate, which lacks sufficient numbers of inspectors to cover the workforce. In response to the emerging regional crisis and war in Ukraine, Moldova has allowed all Ukrainian ID card holders to apply for jobs and while it is likely that some may end up working in specialized early childcare facilities, the majority of the labor opportunities are expected to be facilitated by freeing



mothers from the need to care for dependents and giving them time to search for roles according to their prior skills and experience in other sectors. It will be important for the operation to apply enhanced labor inspections utilizing local stakeholders for monitoring and awareness raising to monitor the conditions for refugees and other vulnerable groups associated with the project activities.

OHS risks associated with the project are anticipated to be localized and properly managed through appropriate contractual conditions, preparation of contractors OHS plans, monitoring and enforcement by subproject supervision consultants. These risks include the range of risks associated with construction activities, operation of machinery, storage of equipment and materials, working at heights, and management of interactions with community traffic during transportation of materials.

LMP are to be prepared for the project outlining the expected number and type of workers, key gaps between ESS2 and national legislation and regulations that need to be addressed at the project level, as well as monitoring and supervision arrangements. Key aspects of the LMP pertaining to contracted workers, such as OHS, adequate working conditions, terms of contract, adequate living conditions in the event of work camps, labor influx and a functioning grievance and redress mechanism for workers, will be included in Contractors' ESMP. LMP will also include CoC to prevent and manage incidents of SEA/SH and risk of violence against children. The LMP will include measures to ensure that contractors screen for and monitor activities to prevent occurrences of SEA/SH and that grievance mechanisms are available for direct and contracted workers. The LMP will review and describe any measures required to enhance the existing dispute resolution mechanism for teacher remuneration mechanism piloted under the project. Workers will be encouraged to use these grievance channels to report concerns relating to COVID-19.

ESS3 Resource Efficiency and Pollution Prevention and Management

Construction of high school hubs and early childcare start-up activities may generate localized, site-specific environmental and social impacts. Air, water and soil pollution, hazardous and non-hazardous waste, oil spills due to the construction activities could result from the civil works and relevant measures will be taken to contain such kinds of pollution. The operation of the high schools will generate moderate amounts of different types of waste (household type and from operation of various laboratories), which will be addressed under existing national regulations by school management. Significant cumulative impacts are unlikely since the school construction is to be located in different geographical regions. However, the sensitivity of the impacts of the school construction in relation to other works in the vicinity will be explored further when precise locations are determined. Guidance will be provided as part of the screening process for the subprojects and mitigation measures included in the ESMPs and ESMP checklists. The ESMPs will include mitigation measures to minimize and manage those risks and impacts. This will include guidance for disposing of waste generated in their activity.

ESS4 Community Health and Safety

Project activities pose site specific risk of adverse impacts on the health and safety of beneficiaries and surrounding tenants and staff during construction of new high school facilities. Risks include generation of waste, noise, dust, transportation of construction materials, and possibility of interactions between community members and project workers due to failure to safely separate work sites. Works are undertaken during business hours and prior advanced



permission and notice is provided of the date and time of the works. Construction works are likely to involve some temporary disruption to road and pedestrian traffic and road access, and risks to students especially if carried on in the vicinity of existing schools. All works are done based on permits issued by local authorities, coordinated with police, transport, utilities and telecom services. All mitigation measures required for ensuring health and safety of communities residing in and around sites of the project intervention will be assessed as part of the project ESMF and included into component specific ESIA, ESMPs and ESMP checklists and made mandatory for adherence by works contractors.

Design and construction of new high school education facilities requires adherence to principles of universal access to ensure that persons with disabilities are not excluded from attending and participating. Universal access should be considered in the physical design of facilities to minimize the need for physical exertion and also to ensure safety of persons with disabilities in the event of emergency and in the regular use of facilities. Procedures and protocols for the new school hubs need to integrate consideration of safe egress for vulnerable students and others who may require additional assistance. Universal access should also be considered in the management of teacher-student relationships. Students with disabilities in many cases will have been transferred from institutional learning to mainstream education and their specific needs should be considered in the classroom. Access that avoids the need for physical exertion, equitable and intuitive use of resources, information customized to student needs, diversity of interaction, and tolerance of error in the learning process should be promoted. These aspects should be outlined in the ESMF and considered as part of ESIA, contractual obligations and preparation of management plans once specific subprojects are identified.

The project activities will bring together in multiple locations stakeholders who are vulnerable to harm and neglect including refugee children, children with disabilities, and poor rural children whose parents work abroad. Dormitory accommodation in education facilities involves specific risks associated with SEA/SH and with privacy, safety and security of vulnerable students which need to be addressed in design and management. Cases of violence against children are reported by teachers and school managers and registered by police. Violence between children at school is also reportedly fuelled by social norms and prejudices at home and involve bullying, cyber-bullying and gender-based violence. Given the direct working relationships between teachers and private sector service providers with vulnerable stakeholders it will be important for contractual provisions to describe vetting of staff who will be working in direct contact with vulnerable children through background character reference checks in addition to appropriate CoCs to prevent violence, mistreatment or discrimination being caused or exacerbated by the range of stakeholders working on the project activities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Civil works for the construction of new high school hubs are not anticipated to require the acquisition of new land area and the MOER has indicated that it has available state land already allocated for these subprojects. However, since the specific locations have not been identified and since locations within urban areas are known to be crowded the subprojects will be screened for land acquisition and potential for economic and physical displacement during project preparation. Pending this screening a Resettlement Policy Framework (RPF) may be required to be prepared prior to appraisal. No other project activities are anticipated to involve the need for land acquisition.



Impacts would likely involve minor economic displacement for users who have informally occupied state land. It is unclear whether any state buildings currently used as refugee centers would be earmarked for subproject activities. However, alternative locations would be identified if significant economic or physical displacement needs were identified. Given the current design and financing allocation for project Component two it is likely that only 2-3 locations would be selected for new high school hubs and they will be geographically disbursed across the country.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project is not expected to involve a change in primary production and/or harvesting of living natural resources. Construction activities financed by the project will source raw materials from established regional and local markets and national quarries. Activities will not be undertaken in sensitive natural areas or in the habitats of endangered species. The potential environmental risks and impacts associated with the project are limited to the site of subproject construction activities. The ESMF will provide guidance on screening and mitigation measures to ensure that project activities do not alter or cause the destruction of critical or sensitive natural habitats.

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

This standard is not relevant. No indigenous peoples who meet the criteria described under this standard reside in the territory of Moldova.

ESS8 Cultural Heritage

This standard is not currently relevant. The project is unlikely to pose an impacts or restrictions on access to known cultural, built heritage. Buildings recognized as valuable from an architectural, aesthetic, spiritual or socio-cultural perspective are not expected to be impacted by the construction activities (religious buildings for example). Activities under the project will be screened for potential impacts including access restrictions on known heritage buildings and sites and practices and relevant national requirements for protection of these sites will be applied. The ESMF and site-specific ESMPs will outline the Chance Find Procedures which will be included for all earth-moving sub-projects.

ESS9 Financial Intermediaries

This standard is not relevant. There is no financial intermediation intended in the design of this project.

B.3 Other Relevant Project Risks

All known risks have been described under the ten E&S standards.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
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OP 7.60 Projects in Disputed Areas	No
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III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

A Common Approach is not being considered.

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

Actions to be completed prior to Bank Board Approval:

- Prepare, disclose, and consult on the Environmental and Social Management Framework (ESMF);
- Prepare, disclose, and consult on the Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM);
- Prepare, disclose, and consult on the Labor Management Procedures (LMP) including worker GM;
- Prepare, disclose, and consult on the Resettlement Policy Framework (RPF) pending clarification on land acquisition needs;

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

- Implement ESMF, SEP, GM and LMP- Prepare, consult, disclose and implement Environmental and Social Impact Assessments (if required) and Environmental and Social Management Plans (ESMP) for subprojects;
- Prepare, consult, disclose and implement Resettlement Action Plans (RAP) for subprojects if required;
- Prepare an Assessment of GBV risk in childcare and secondary education settings to an SEA/SH action plan
- Require companies bidding for the delivery of high school construction and early education services under the project to include their Environment, Social, Health and Safety Codes of Conduct (including SEA/SH and child protections), labor management procedures and GM in the bidding documents;
- Child protection regulations deemed necessary will be included in design of operational management plans for high school hubs and contractual provisions associated with the participation of private companies in project benefits associated with early childcare service provision;
- Reporting to the Bank on the environmental and social performance of the project as part of the established progress reporting procedure

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

20-Feb-2023

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: Republic of Moldova

Implementing Agency(ies)

Implementing Agency: Ministry of Education and Research

Implementing Agency: National Office for Regional and Local Development

Implementing Agency: Ministry of Education and Research

Implementing Agency: National Office for Regional and Local Development (NORLD)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Lucia Casap, Anna Olefir

Practice Manager (ENR/Social) Anne Olufunke Asaolu Recommended on 14-Nov-2022 at 19:24:50 GMT-05:00

Safeguards Advisor ESSA Abdoulaye Gadiere (SAESSA) Cleared on 17-Nov-2022 at 08:57:2 GMT-05:00