



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

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**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	3/30/2023	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

Project Development Objectives are to: (i) improve the quality of teaching practices of participating teachers and physical learning environments of selected educational institutions; (ii) strengthen capacity of the Ministry of Education and Research for sector management; and (iii) in case of an Eligible Crisis or Emergency, respond promptly and effectively to it.

Financing (in USD Million)	Amount
Total Project Cost	58.90

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

No

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



Education is a national priority for Moldova in the National Development Strategy (NDS) 'European Moldova 2030'. Under the Moldova Education Strategy 2014-2020, the Government of Moldova (GoM) implemented comprehensive reforms to improve learning and value for money in education. Moldova made significant progress on education outcomes over the last decades, but further improvements are needed. Learning losses caused by the pandemic, must be recovered, to avoid the erosion of human capital and long-term damage to Moldovan children's future well-being and productivity. A significant reform of the education system in Moldova relates to embracing a competency-based approach in teaching and evaluation, but more is needed to enhance teachers' understanding to practice it in the classroom. Continued efforts are also important to improve equity and inclusion. Despite the progress made, lack of access to preschool education is a persistent challenge for disadvantaged children and younger cohorts. The quality and safety of school infrastructure is an important determinant in educational outcomes, but most public schools are under pressing need of rehabilitation and modernization. The COVID-19 pandemic has further highlighted the importance of equal access to water, sanitation, sewerage installations, Information Communication Technology (ICT) infrastructure, and spatial flexibility in educational institutions. The existing large between-school inequities in learning environments and the poor state of existing infrastructure also call for a new approach for upper secondary level. The selection of areas for support in the proposed project is made in coordination with development partners and other education stakeholders.

Component 1: Improve quality of teaching (US\$8.6 million IBRD; US\$4.7 million GPE; US\$ 2.7 million ELP and potentially US\$ 3.2 million Global Concessional Financing Facility (GCFF)).

Subcomponent 1.1. Improve quality of teaching practices of participating teachers: this subcomponent will support implementation of in-service training programs for teachers and managers as instructional leaders on revised standards (which include digital pedagogy) prioritizing schools with larger share of disadvantaged students; scale up of assessment of quality of teaching to understand extent that teachers: (a) create a culture that is conducive to learning, (b) instruct in a way that deepens student understanding and encourages critical thinking, (c) foster socioemotional skills that encourage students to succeed both inside and outside the classroom, and (d) use inclusive teaching practices that help all students learn; in-service training for teachers and educators to strengthen pedagogical capacity to implement Early Childhood Education (ECE) Curriculum (ECEC) and support play-based teaching; development of ECE classroom observation tool; quality assessment of sample of ECE service providers. In this sense, the ECEC will also be provided with a standard package which will include the provision of indoor and outdoor teaching and learning and play materials (including in Ukrainian language such as Romanian-Ukrainian learning materials developed by the UNICEF).

Subcomponent 1.2. Develop, pilot and implement learning recovery program targeting disadvantaged students, implementation of rapid formative learning assessments in key subject areas (e.g., reading and math) initially in one selected grade to identify lagging students and learning gaps, and to inform instructional practices. Supplemental tutoring, remedial and/or accelerated learning program for disadvantaged students in bottom 20 percent performance after sample group participates in initial impact evaluation. Identification and targeting facilitated by student-level Education Management Information System (EMIS) and other sources of data on vulnerability, socioeconomic status, and academic performance.

Subcomponent 1.3. Promote teacher professional development and innovative instructional practices: small grant-supported projects aligned with the NDS "European Moldova 2030" to support: (i) professional development opportunities for teachers and (ii) projects promoting innovative instructional practices in the several priority areas. These include projects relying on: (a) digital tools and focused on active and engaging learning experiences for students; (b) effective student learning assessment and feedback practices used by teachers; (c) active learning,



collaborative learning, building a sense of community, belonging and well-being of students; (d) innovative remedial programs for students lagging academically and disadvantaged students including Roma children, refugee students from Ukraine and children with Special Educational Needs (SEN) and disabilities, (e) girls' participation in the STEM fields; (f) exchange experiences and mobility programs, creating and developing a community of practice in teaching innovations. They will also support the professional learning network between Moldovan teachers, and potentially collaboration with teachers from Romania, Estonia and other countries facing similar challenges.

Component 2: Improve the quality and resilience of learning environments in selected educational institutions (US\$24.7 million IDA, US\$2.3 million ELP and potentially US\$5.4 GCFF concessional financing)

Subcomponent 2.1. Equipping selected schools to improve learning environment. This subcomponent will support (a) an identification study, including the definition of criteria to determine which educational institutions will be selected to receive support (also considering the sustainability of investments in light of declining student population); (b) a needs assessment in each educational institution to determine the availability of basic infrastructure (water supply and sanitation) and put adequate mechanisms in place to ensure local governments supply basic infrastructure, if needed, before receiving investment ; (c) provision of furniture and IT equipment, and STEM equipment for schools, prioritizing energy-efficient equipment to reduce energy consumption and greenhouse gas emissions; and (d) training of teachers and managers along with user guides and demonstration videos on operating and maintaining IT and STEM equipment as well as the use of such equipment with modern teaching methodologies and digital learning materials in the classrooms.

Subcomponent 2.2. Rehabilitation of selected schools and preschools: this subcomponent will support technical preparation and design, civil works, and supervision of civil works. It will focus on school buildings that have the highest risk of collapse or serious damage in an event of an earthquake which could jeopardize the health and safety of students, teachers, and other building users. The project will target/support the schools with lower socioeconomic composition serving a larger share of disadvantaged students. The selection criteria will also prioritize the schools in areas with higher deprivation index, with sufficient school capacity utilization, failing to meet basic WASH and other infrastructure requirements. This will be followed by field verification. Schools on the priority list will be cross-checked to ensure that they are not prioritized under current or future funding by local authorities or other development partners, and that they have not undergone recent comprehensive renovations. This subcomponent would also target ECEC facilities that could expand access (with quality) to the vulnerable children from Moldovan families and refugee children from Ukraine. Minor rehabilitations including WASH facilities in centers that do not have access to water will be supported. Rehabilitation will follow similar prioritization as for schools but will focus only on those ECEC facilities which commit to expand access to vulnerable children from Moldovan families and refugee children from Ukraine, not yet covered by ECEC services.

Subcomponent 2.3. Building new resilient high schools: this subcomponent will support reform of upper secondary education which according to the NDS "European Moldova 2030" is to establish the separate high schools to standardize access to high-quality upper secondary education across the country. Specifically, this subcomponent will support: (a) construction of the three schools; (b) provision of furniture and equipment for classrooms, canteens , and sports facilities, and (c) training modules and adoption of manuals on school maintenance (including operation and maintenance of clean technologies), contributing to the long-term climate resilience, climate mitigation, and sustainability of investments in infrastructure. Procedures and protocols for the new schools will integrate consideration of safe egress for vulnerable students and others who may require additional assistance. Civil works that might cause land acquisition or involuntary resettlement will not be eligible for financing under the project.



Component 3: Support capacity building for reforms and project management (US\$6.7 million IBRD and potentially US\$1.3 GCFF concessional financing)

Sub-component 3.1: Capacity building for effective sector and reform management critical sectoral studies and capacity building for policy planning, monitoring and evaluation of reforms and project interventions focusing on support of disadvantaged students; technical assistance, capacity building and critical analytical work to support teacher policy reform; PISA and national assessments; rapid assessments of student progress; data management and analytics for evidence-based decision-making, and on ECEC reforms; technical assistance and capacity building on upper secondary education reform; knowledge exchange of the MoER with the Ministry of Education of Romania and Estonia; research for improving climate change resilience of the education system; TA and capacity building for the development of policies to harness the potential of the private sector to close the gap in ECEC service provision in Moldova, in an inclusive manner, while increasing access for refugee children from Ukraine to ECEC services and their parents to the labor market, thereby reducing their economic and social vulnerability. This subcomponent will also support strategic integrated investments planning: development of a long-term plan for integrated investments in resilient and modern school infrastructure which will identify facilities needs based on the demographic trends and anticipated demand/enrollment projections and local network optimization plans; guidance and training for central and local level authorities on designing and implementing safer, sustainable, and inclusive school projects, focusing on various aspects such as planning, technical aspects, procurement, sustainable operations and maintenance practices, with details of the training to be defined in the Project Operations Manual (POM).

Sub-component 3.2: Project management, monitoring and evaluation: project supervision, procurement and financial management (FM), social and environmental management, monitoring and evaluation, essential communications strategy; support MoER/Project Management Team (PMT) and NORLD team with staff responsible for fiduciary responsibilities, adherence to environmental and social standards, technical oversight, monitoring and evaluation, annual audits, stakeholder engagement and consultations.

Component 4: Contingent Emergency Response Component (US\$0): with the objective to support the country's future response if a natural or manmade disaster or emergency arises, in line with 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) closed 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 target the improvement of the teaching and learning environment in selected educational institutions (with lower socioeconomic composition serving a larger number of disadvantaged students) while the institutional capacity building of the MoER for improved management of the education system will be implemented nationwide. The 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 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 schools 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. Such school settings also pose some child protection, social inclusion, and Gender-Based Violence (GBV) risks especially for refugee children, those with disabilities, and those from poor rural families. 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 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 preschool 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 be required to hire a qualified social specialist with particular experience in stakeholder engagement in human development aspects of the education sector, a qualified environmental specialist and a qualified OHS specialist in the Project Management Team (PMT). The task team will also identify capacity building needs for beneficiary institutions, especially those new high schools created by the project which may become operational during the life of the project.

II. SUMMARY OF 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 implementation, once more information on the scale of construction becomes available, as more complex construction works could result in generation of significant waste, community health and safety 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 neighbors (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. The local authorities are expected to ensure basic infrastructure (water supply and sanitation) before receiving investment and therefore if such investment are needed for the purpose of the project, those should also respect ESF standards, as associated facilities to the project. 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 impacts on biodiversity and habitats are expected as the Works will be done in urban environment. 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 are outlined in the Project's Environmental and Social Management Framework (ESMF) prepared by MoER and NORLD. The ESMF clearly sets 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 refers 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 during construction both for the construction workers and the related communities. As the project also include a Contingent Emergency Response Component (CERC), the ESMF 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. MOER has confirmed that land acquisition is not required and all construction activities will occur on available state lands and within the confines of existing school premises. Further screening to verify this will be undertaken once high school locations are selected. Construction will be limited 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 schools brings vulnerable students together posing some child protection, social inclusion, and gender-based violence risks especially for refugee children, those with disabilities, those from poor rural settings, Roma children and LGBTIQ+ 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 schools 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, including risk of incidents involving vulnerable children with disabilities, refugees, and minorities, is also reportedly fueled by social norms and prejudices and involves bullying, cyber-bullying and gender-based violence. Assessment of Gender Base Violence (GBV) has been 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 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, rehabilitation of selected schools and preschools, 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 girls, and learning recovery for least performing students and those with vulnerabilities status (disabilities, poor households). 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 including classrooms, canteens, sports facilities, and provision of laboratory, IT and STEM equipment and materials for selected schools. Component 2 has been altered and dormitories will no longer be included in the design of the proposed new high schools. At the same time, under Component 2 activities related to the early childhood services involves assessment of existing early childhood education providers (kindergartens, daycare), provision of teaching materials, digital training, minor renovations for Water, And Sanitation Hygiene (WASH) facilities.

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 schools are not yet known, 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 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. 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 schools 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. This operation makes positive interventions to reduce risk of abuse by encouraging the relocation of children with disabilities from institutions to mainstream schools.



The Borrower's assessment has identified the prevalence of intimate partner violence in Moldova (73 percent of ever-partnered women and girls since age 15), barriers to reporting violence (shame, fear, mistrust, financial, lack of information, lack of recognition of what counts as violence) and the presence of Violence Against Children (VAC). Country systems have been enhanced and include an established institutional response that incorporates specialist third-party service providers. This existing risk context is now complicated by the arrival of refugees from Ukraine and pressure on Moldovan schools to accommodate thousands of children seeking an education. Within this context the assessment identifies risks associated with the presence of construction workers in proximity to local communities and vulnerable children during school construction and rehabilitation. It also acknowledges potential for harm resulting from exploitative relations between teachers, managers and students within the school system. Violence in schools can have serious effects on children's psychological and physical health and may result in physical injury, sexually transmitted infections, depression, anxiety, post-traumatic stress disorder (PTSD) and suicidal thoughts. VAC takes different forms in school, including physical hitting, kicking, slapping, shoving, hair-pulling, verbal name-calling, teasing, using belittling expressions, relational ostracizing, spreading rumours, social manipulation, and sexual name-calling, uninvited touching, propositioning. The project has drafted an SEA/SH Action Plan to describe resources and actions for preventing and addressing such risks in relation to the construction and operation of high schools and provision of ECE. The action plan prescribes formation of a compliance team for managing construction risks consisting of the PMT, contractor management, supervision consultants and service provider representatives to provide training and sensitization on GBV and child protection measures. It also prescribes MOER's child protection policy implementation guide in order to address operational risks. The SEA/SH Action Plan is to be updated prior to the launch of new high schools to take into consideration more specific risks once the composition of these schools is defined through project planning under Component 2.

Since the details of most of the sub-project sites are not yet known, common risks and impacts are addressed in an Environmental and Social Management Framework (ESMF). The ESMF provides selection, screening and assessment criteria to inform the design and operation of new high schools 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 specifies the legislative and regulatory framework, describing procedures and outlining 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 provides 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 from the Government of Moldova to activate the CERC. The ESMF has been 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 are codified in an Environmental and Social Commitment Plan (ESCP).



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. 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. Measures should be taken to ensure that refugees from the regional crisis associated with the war in Ukraine are not excluded and benefit from interventions. 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 correspond with decision-making on the implementation of capital works as well as programmatic activities. This should involve consultations on the ESIA's and management plans associated with the civil works and the operation of new high schools and inform the regulatory enhancements required to promote expansion of private sector early childcare facilities. The PMT has prepared an overall project SEP which identifies potential project-affected and other interested parties and outlines measures for engagement with these stakeholders. The SEP has been subject to preliminary consultations with stakeholders and is aligned with the environmental and social risk assessment and mitigation planning undertaken to prepare the ESMF and LMP. The SEP specifies the institutional roles and responsibilities, timeline, and budget for conducting the stakeholder engagement. The SEP also describes a project-level GM which will be established and maintained throughout project implementation with sufficient resources and staff time. A dedicated mechanism is described in the SEP with procedures and capacity to handle complaints associated with SEA/SH and VAC including referral to specialist national service providers. The PMT will compile an annual report summarizing stakeholder engagement activities, and implementation of the grievance mechanism. This report will provide a summary of all public consultation issues, grievances received and progress of resolution.

The ESF package (ESMF, SEP, ESCP, LMP, SEA/SHAP) has been disclosed for a period of two weeks in March, 2023 and a number of consultation events held prior to appraisal supported by a survey questionnaire with the aim of soliciting feedback on the project, its environmental and social risks, and the suitability of mitigation measures proposed. The project will consider approaches to incorporating any relevant feedback either directly in project design or in the application of risk mitigation measures and document the consultation findings in the SEP.

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 PMT. 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 child protection regulations are included in the SEA/SH Action Plan for high 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 the SEA/SH Action Plan prescribes the MOER's child protection policy which includes provisions for 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 have been 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, labor influx and a functioning grievance and redress mechanism for workers, will also be included in Contractors' ESMP. LMP also include CoC to prevent and manage incidents of SEA/SH and risk of violence against children. The LMP 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. Workers will be encouraged to use these grievance channels to report concerns relating to COVID-19.

ESS3 Resource Efficiency and Pollution Prevention and Management

The designs for new schools 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.

Construction of high schools 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 ESIA, 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. Mitigation measures required for ensuring health and safety of communities residing in and around sites of the project intervention have been assessed as part of the project ESMP and will be 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 schools 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 are to be integrated into the development of a long-term plan for integrated investments in resilient and modern school infrastructure under subcomponent 3.1 which will identify facilities needs for safe and inclusive schools and further defined in the Project Operations Manual (POM). They are also identified as a core element of the detailed technical designs for high school construction under subcomponents 2.2 and 2.3 and will be considered as part of ESIA, contractual obligations and preparation of ES management plans once specific subprojects are identified. All schools built/rehabilitated and supplied with equipment under the Project will need to develop/update their emergency plans (especially, with consideration of new infrastructure) and ensure proper training of staff and students (considering earthquake emergencies too)

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. 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. The SEA/SH Action Plan prescribes application of the MOER's child protection policy implementation guide which is published on the MOER website (https://mecc.gov.md/sites/default/files/politica_de_protectie_a_copiluluighid_de_implementare.pdf) and describes employee vetting procedures. These cover all staff whether paid, unpaid, full or part time who interact directly or indirectly with children. They are aimed at discouraging undesirable persons from applying and identifying those who present risk to children during the recruitment process and while employed. Accountability and decision-making rests with the director of the institution and assessment is performed by an education coordinator. Candidates are screened for identity and work history and written statements and declaration forms are required. Situations related to child protection are discussed during the interview. Training is also required for all staff including on the obligation to report cases of abuse, neglect, exploitation and child trafficking.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is not currently relevant. Civil works for the construction of new high schools 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. MOER has confirmed during preparation that feasible locations within urban areas do not require land acquisition and have no potential for economic and physical displacement. Additional screening will occur upon selection of the high school sites to ensure that there is no risk of displacement. Alternative locations would be identified if economic or physical displacement was detected.



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. The project will be implemented in urban areas , therefore is no consequential loss in biodiversity.

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.

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

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



IV. CONTACT POINTS

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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

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