

**INTEGRATED SAFEGUARDS DATASHEET  
APPRAISAL STAGE**

**I. Basic Information**

Date prepared/updated: 09/10/2014

Report No.: AC7141

**1. Basic Project Data**

Original Project ID: P113435	Original Project Name: Bangladesh - Primary Education Development Program III	
Country: Bangladesh	Project ID: P150669	
Project Name: AF Bangladesh - Primary Education Development Program III		
Task Team Leader: Ayesha Y. Vawda		
Estimated Appraisal Date: September 26, 2014	Estimated Board Date: December 15, 2014	
Managing Unit: GEDDR	Lending Instrument: Investment Project Financing	
Sector: Primary education (100%)		
Theme: Education for all (100%)		
IBRD Amount (US\$m.):	0	
IDA Amount (US\$m.):	400	
GEF Amount (US\$m.):	0	
PCF Amount (US\$m.):	0	
Other financing amounts by source:		
<u>BORROWER/RECIPIENT</u>		0.00
		0.00
Environmental Category: B - Partial Assessment		
Simplified Processing	Simple <input type="checkbox"/>	Repeater <input checked="" type="checkbox"/>
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

**2. Project Objectives**

The Project Development Objective of the proposed Additional Financing (AF) project will remain unchanged from the original project and will continue to "(i) increase participation and reduce social disparities in primary education, (ii) increase the number of children completing primary education and improve the quality of the learning environment and measurement of students learning, and (iii) improve effectiveness of resource use for primary education."

**3. Project Description**

The proposed Additional Financing (AF) is being sought to support recommendations emerging from the ongoing Mid-Term Review (MTR) of the PEDP3 program. These include: (1) deepening of the reforms successfully initiated through the original Credit, particularly related to quality enhancement and equity targeting; (2) extending universal coverage of program interventions to approximately 26,000 recently nationalized "Registered Non-Government Primary Schools" (RNGPS); (3) extending the closing

date of the program to June 30, 2018 in harmonization with the government program (activities of which are expected to complete in June 2017) and the financing proposed by all other Development Partners; and (4) addressing a financing gap that results from the government program closing date extension, impact of the national pay scale implemented since FY2012/13, and an increase in infrastructure costs arising from introduction of WASH blocks in standard school design and overall increase in unit cost of construction. The World Bank has been nominated as the Supervising Entity (SE) for the proposed \$100m Global Partnership for Education (GPE) grant to be provided through PEDP3. GPE grant financing is expected to be fully aligned and integrated with the processing of this AF.

Proposed changes under Additional Financing. There will be additional activities brought about under the AF as a result of deepening reforms related to quality enhancement and equity targeting, and extending universal coverage of interventions to the nationalized RNGPS. However, the nature of those activities will remain unchanged. No additional safeguards policies will be triggered due to the AF. The original ESMF for PEDP3 has been updated to incorporate the lessons learned from implementation of the project so far.

A restructuring of the original Credit is proposed in light of implementation experience to date, to: (i) amend Year-3 targets for three DLIs (Teacher Education and Professional Development, Needs-based Infrastructure Development, and Teacher Recruitment and Deployment); (ii) eliminate the 18-month limit for achieving DLIs; (iii) utilize the funds that could not be disbursed for the Year-0 DLIs, and (iv) change the estimated DLI disbursement schedule from an annual to a bi-annual basis.

Outcome indicators, intermediate outcome indicators, and their targets would be revised to reflect scaled-up and expanded program interventions to be carried out by the proposed new closing date of June 30, 2018. Further clarity would be provided on indicator definitions, data sources and frequency of data availability, and additional indicators related to the proposed activities for Years 4-6 of the project will be included, consistent with conclusions of the MTR. While it is proposed to continue the practice of allocating equal (disbursement) value to each DLI, the level of financing per DLI would increase for the Year-4 to Year-6 DLIs because their milestones are more complex and challenging than the Year-0 to Year-3 milestones.

The emphases going forward which principally motivate the proposed AF and restructuring are briefly summarized below by each Part of the project.

Part 1: The emphasis is on scaling up, from the foundation built to date, to implement a further set of reforms focused on improving quality, while extending project coverage to the newly nationalized RNGPS. There are serious cost implications, in terms of technical assistance, implementation, and monitoring. Priorities are to:

- Expand the scope of coverage of the higher standards for teacher qualifications (i.e. DPED), while setting foundations for institutionalization, accreditation and

conversion of the program from an in-service to the premier pre-service program for primary teachers in the country;

- Mainstream the system's proactive accountability for each child's learning by increasing and institutionalizing channels for using the "ECL" approach and materials;
- Disseminate and consolidate applying the modernized curriculum which also involves revised textbooks and exams; and
- Use ICT more extensively to support broader and more effective coverage of training and other development initiatives across the primary education sector.

Part 2: The emphasis is more effectively to target mechanisms focused on the remaining, hardest-to-reach population groups, to enroll and retain children in school. Priorities are to boost completion rates and learning outcomes of disadvantaged children by ensuring good quality, targeted Pre-Primary Education reaches them, to infuse school improvement planning with a much stronger results focus, and link policy and activities vis-à-vis Second Chance Education directly and more strategically to the national education policy goals to universalize primary education. For more transparent and effective identification of prioritized sites for needs-based infrastructure, the needs list is being converted to a "live" database, and results of efficiency gains analysis must feed into decisions on options for construction design.

Part 3: The emphasis is on continued system strengthening. The major initiatives of the project are evolving in a complex system of over 100,000 schools, 450,000 teachers, and 19 million students. The proposed AF and extension of the ongoing project would deepen the development impact of its focus on inclusiveness and quality of primary education by allowing MoPME and DPE adequate time and more resources to consolidate gains and promote synergies between the numerous interventions PEDP3 introduces on many fronts simultaneously. Under the AF, the project will also contribute to GoB's strategic thinking and systemic planning for implementing the National Education Policy intentions to extend primary education beyond Grade 5. Priorities are to:

- Build on improvements to date in data collection and analysis (inter alia, improving the tools for Annual School Census, Annual Sector Performance Report, Education Household Survey, National Student Assessment) and the use of data for evidence-based policy decision making at all levels of the system;
- Garner evidence from the use of SLIP and UPEP funds, in order to guide and support decentralized management and governance, also tackling emerging concerns such as low teacher-student contact hours;
- Examine lessons from existing public-private partnerships and bring these to greater use in primary education, especially for pre-primary and second chance education.

#### **4. Project Location and salient physical characteristics relevant to the safeguard analysis**

The PEDP 3 will be implemented all over Bangladesh. Many of these schools are likely to be built in the disaster-prone coastal regions where they will also serve as shelters during cyclone and natural calamities. The schools in the Chittagong Hill Tracts (CHT), which have the largest concentration of the country's indigenous population, would be

designed considering the norms and culture of the indigenous population. The project, based on lessons learned during implementation has conducted a rigorous communication campaign with the indigenous people in the CHT and has proposed three models for Hill-friendly schools designed in a participatory and consultative manner with the School Management Committees and local communities. The actual locations of the schools where infrastructure would be provided will be finalized after site verification by implementing agency (DPE, LGED, DPHE) of the assessed need prepared by the consultant. The project will also continue to support construction/reconstruction/renovation of primary teachers' training institute, education office at upazila (sub-district) level, boundary wall etc. The schools will be selected and prioritized based on the certain parameters. The following criteria have been adopted for ranking the infrastructure needs under PEDP 3.

Order of prioritization: Additional classrooms

- 1) Additional class
- 2) Additional teachers
- 3) Teachers' room
- 4) Replace kacha road
- 5) Number of students

Order of prioritization: Toilets

- 1) Girls' WC
- 2) Girls' enrolment
- 3) Boys' WC
- 4) Urinals

Order of prioritization: Drinking Water

- 1) Proposed water
- 2) Girls' enrolment
- 3) Number of students

## **5. Environmental and Social Safeguards Specialists**

Ms Sabah Moyeen (GSURR)

Ms Nadia Sharmin (GSURR)

<b>6. Safeguard Policies Triggered</b>	<b>Yes</b>	<b>No</b>
<b>Environmental Assessment (OP/BP 4.01)</b>	<b>X</b>	
<b>Natural Habitats (OP/BP 4.04)</b>		<b>X</b>
<b>Forests (OP/BP 4.36)</b>		<b>X</b>
<b>Pest Management (OP 4.09)</b>		<b>X</b>
<b>Physical Cultural Resources (OP/BP 4.11)</b>		<b>X</b>
<b>Indigenous Peoples (OP/BP 4.10)</b>	<b>X</b>	
<b>Involuntary Resettlement (OP/BP 4.12)</b>	<b>X</b>	
<b>Safety of Dams (OP/BP 4.37)</b>		<b>X</b>
<b>Projects on International Waterways (OP/BP 7.50)</b>		<b>X</b>
<b>Projects in Disputed Areas (OP/BP 7.60)</b>		<b>X</b>

## **II. Key Safeguard Policy Issues and Their Management**

### ***A. Summary of Key Safeguard Issues***

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts: Environment issues: No new type of activities from original project are proposed under the AF. As in the original project, operational policy OP/BP 4.01 will continue to be triggered and the current Environmental category B will remain the same under the AF. The program will continue to support mainly four (04) types of the "subprojects". These are: i) new building construction, ii) expansion or major renovation of existing buildings; iii) regular operation and maintenance and minor renovation of buildings and iv) water supply and sanitation provision. The new building construction may include construction of additional class room or teachers room, at new locations. The nature of civil works proposed to be financed under the program is not likely to cause significant and/or irreversible adverse environmental impacts with application of standard construction management practices. The project will also finance provisions of safe drinking water (tube-wells, shallow tube-wells and other alternative sources) and sanitation facilities (toilets, WASH block) to targeted schools based on agreed guidelines and provisions in the EMF. Beneficiary institutions for tube-wells and toilets/WASH Blocks will be selected based on need. Arsenic content is also a challenge in the project areas and so is the potential issue with adjacent location of toilets to tube-wells leading to groundwater contamination, and lack of proper design, construction and maintenance of tube well and toilet.

Apart from construction of additional class rooms, WASH Blocks and water points, PEDP 3 would also support the extension of the Head Quarter Building of Directorate of Primary Education (DPE) and a Leadership Center at Cox's Bazar. Both the buildings are supposed be multistoried buildings, one within the campus of the present DPE HQ which is in Dhaka and the other one within the campus of the office of District Primary Education Officer, Cox's Bazar. The design of the buildings has not yet been finalized. It appears from a preliminary site visit that location wise there are no major environmental or social concerns. However, as they would be multistoried buildings, an Environmental Assessment will be undertaken before commencement of the work and will be shared with Bank.

Social issues: The project will not undertake activities different in nature to those undertaken during the current phase, but will expand, deepen and improve the quality of those activities and services. OP 4.10 has been triggered for the Additional Financing, as it had been for PEDP3. The existing Social Management Framework which includes an Indigenous People's Development Framework will be updated to incorporate lessons learnt from the current phase of the project and will focus on regional differences in the needs of IPs, IP school designs, strategizing on reaching hard to reach people including IPs, people living in remote areas, minorities, marginalized and disadvantaged children. As mentioned above and based on lessons learned, the Gender and Inclusive Education Plan has been prepared incorporating the priorities and policies of all development partners (DPs) involved, as a standalone document in order to highlight the importance of those issues and ensure rigorous implementation. It includes a number of specific monitoring indicators to be monitored by a dedicated cell at DPE.

OP 4.12 Although OP 4.12 had been triggered for PEDP3, no land acquisition displacement or adverse impacts on livelihoods occurred as all civil works were carried out within DPE premises strictly. The same process will be followed during this AF phase as well. However, like the previous phase, DPE prefers to keep the option for land acquisition open during the current phase too. Accordingly OP 4.12 is triggered and resettlement policy framework including screening formats and RAP preparation guidelines are incorporated in the SMF.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

The activities that trigger both IP and environment are not expected to create any adverse impacts in the long-term. If anything, project activities (both school facilities and stipends) are expected to provide positive impacts to student beneficiaries while in school.

Most of the project impacts are localized due to the relatively small-scale activities. However, there are some issues of concern that cut across the range of proposed interventions. Field studies and lessons from original project and Third Party Validation report of the WASH program show that issues such as selection of appropriate sites and location of various components of civil works within the school campus for maintaining better school environment, appropriate discharge of effluent from toilets/WASH Blocks, addressing gender issue and access for students with disabilities in design and construction of toilets/WAHS Blocks need strong monitoring along with construction phase monitoring of various environmental issues.

#### Lessons Learned and Action from the Original Project Field Supervision

During the implementation of PEDP 3, construction, expansion and maintenance of infrastructure went through environmental screening. Report on environmental issues was submitted by DPE as part of reporting obligation. Consultant of LGED and DPHE visited the sites as a part of their routine job to monitor the compliance of the recommendations of the environmental screening at the field level. Moreover, a number of field visits were

undertaken by the World Bank professionals to see the compliance of the environmental safeguard issues. Some of the issues came out from these are summarized below:

- It seems that the data captured by the field offices some time are not properly reflecting the field condition and the environmental issues. It was felt that the screening format needs to be modified to make those more effective in capturing the field condition. The screening format is updated in the revised version of the EMF.
- Also the capacity of the officials who are associated with the environmental screening and monitoring at the field and HQ level should be enhanced.
- It was found during the filed visits that the construction materials are not properly stacked in the school premises which pose safety concern to the children in many instances. A guide line needs to be prepared for the contractors observance of which would be made mandatory for them and would be a part of the tender/contract document. Such a guide line has been attached with the revised EMF.
- While the male and female WASH Blocks are supposed to be separately located considering the cultural norm of the country, it is not being properly followed. Sometime shortage of land a cause for such noncompliance. However, even if due to scarcity of land which compel to construct male and female WASH Blocks side by side, all efforts will be made to keep the entry in the opposite direction.

#### Third Party Validation on WASH

To assess the effectiveness of the water sources and toilets installed/constructed so far, a third party independent sample testing and verification of arsenic, iron, manganese and microbial contents as well as sanitation facilities provided both under PEDP-II and PEDP 3 was undertaken in 2013. About 286 schools were sampled out of which 173 were from PEDP-II, 52 were from PEDP 3, 50 schools from the list of school which were supposed to get alternative water sources and 11 schools where tube wells were provided by other agencies were selected. Some of the key observations and recommendations from that third party validation are as follows:

- The tube wells where concentration of arsenic was found more than the acceptable limit are found to be identified. Alternative source of water has been recommended.
- It was found that no information is available in the school about the depth of the strainer of the tube wells which is important to have an idea about the aquifer from where water is being extracted. Under PEDP 3, an MIS system has been developed which will keep the record of the relevant technical information.
- About 52% of the schools reported nonfunctional tube wells most of which were provided through PEDP II intervention. The primary reasons for non-functionality are: stolen pump heads, broken pump handles, damaged check valves, broken plungers, corrosion of well pipe due to high salinity, lowering of water table, Low/no yield due to inadequate pump development following installation, abandonment of wells in high salinity and high iron area. It has been observed that a number of PEDP II well have been abandoned because of high salinity and/or high iron. In such case avoidance of high salinity and high iron prone areas are considered. However, seeking alternative sources,

such as, rainwater harvesting, use of treated surface water, pond sand filtration, etc. may alleviate the problem.

- Most of the tube wells surveyed have concrete bases and platforms.

The typical environmental impacts related to the school construction and water supply and sanitation issues are (i); (ii) drainage congestion/water logging; (iii) surface water pollution; (iv) dust and noise pollution; (v) lack of safe distance between tube-wells and sanitary latrines; (vi) occupational health hazards and safety practices; (vii) improper maintenance of water supply and sanitation facilities; (viii) lack of maintenance of air and water quality, (ix) improper and insufficient management of surrounding ecosystem and biodiversity (if any), etc.

The PEDP 3 intends to ensure that every school has at least one safe drinking water source, which is either a tube-well, piped water supply or any other alternatives. The source will be arsenic-free. Arsenic poses the major environmental concern and health risk with the installation of new tube-well. In the absence of proper testing facilities and alternative option, students may continue to consume arsenic contaminated water in arsenic affected-areas of the project. The long-term exposures to arsenic in drinking water may affect human health and vegetation.

The social impacts of the project are expected to be largely beneficial. The current phase identified some shortcoming in the communication and outreach strategy which will be improved and strengthened in the SMF prepared for the AF. The outreach strategy which is also elaborated in the Gender and Inclusive Education Plan will be focused on the inclusion and incentivizing the participation of hard to reach people such as those living in remote areas, indigenous people and ethnic minorities, marginalized and very poor populations. Gender issues such as recruitment of qualified female teachers will be addressed in the SMF.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

In the original plan, standalone toilets and urinals were planned. But later on, WASH Blocks were introduced to include the hand washing facilities. In the present design, male WASH Block consists of a three toilet compartments, two having English Pan and one having Commode to be used by the disabled children. There is also a basin for hand washing, a foot washing facility and two urinals. The female WASH Blocks also have similar features except the urinals. The design of the WASH block was finalized after multi-level consultation among Directorate of Primary Education (DPE), Department of Public Health Engineering (DPHE), UNICEF and Local Government Engineering Department (LGED).

Provision of installation of source of drinking water in the form of shallow tube wells, deep tube wells and other alternatives sources are also included in the program. All the tube wells installed under the program are tested for arsenic. DPHE laboratory unit undertakes these testing of the 100% new tube wells installed under the program. If arsenic is found, alternative sources are considered in those cases. The location of



tubewell installation and the type of water source is also finalized based on the consultation among DPHE and School Management Committee.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Environment: To address potential environmental safeguard issues, the AF will strengthen monitoring aspects of the construction/reconstruction of school building, education office, dormitory, academic building and teachers' training institute by LGED and construction work of water supply and sanitation facilities by DPHE. It will continue to include regular reporting on arsenic test and efficient database management. Separate part time Environmental Specialist is deployed both in LGED and DPHE in the project and the performance of environmental management is expected to continue improving under the AF.

Given the scope of the additional financing the Environmental Management Framework (EMF) adopted for the original PEDP 3 project will also be applicable to the Additional Financing. The EMF outlines the environmental management procedures that already practiced in original project during the construction period and also in the operation & maintenance period to minimize the negative impacts and implementation of enhancement measures. The EMF has been updated based on the lessons learned from the original project and third party validation of the WASH program. A Deputy Director will continue to be responsible for the overall environmental monitoring on behalf of DPE . PEDP III will continue the MoU signed with DPHE to obtain technical services for safe water testing of tube-wells and sanitation activities. The MoU with LGED will continue to ensure environmental safeguard supervision for the construction/reconstruction related tasks.

Social Inclusion: The existing legal covenants on the social safeguards would continue to apply. The updated Social Management Framework (SMF) will reflect lessons learned from the ongoing project. The Local Government Engineering Department (LGED) has maintained and would continue to maintain a database on the enrollment of tribal children, their retention rates and academic progression. A specific Gender and Inclusive Education Action Plan has been prepared for the project with input from all development partners which emphasizes the active inclusion of indigenous, extremely poor and vulnerable, disabled children and those residing in remote, disaster prone areas.

At the community level, AF project will provide the Parent Teacher Associations of each school with PTA grants towards education awareness and community mobilization to address and alleviate the issue. Besides, PTA grants can support school level community outreach on general issues affecting the student populations.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people. The updated SMF and EMF for the AF will be publicly disclosed as was the case with the ongoing project. These will be closely monitored by the implementing agency as well the Bank task team on a regular basis.

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***B. Disclosure Requirements Date***

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**Environmental Assessment/Audit/Management Plan/Other:**

Was the document disclosed <b>prior to appraisal?</b>	Yes
Date of receipt by the Bank	09/08/2014
Date of "in-country" disclosure	09/09/2014
Date of submission to InfoShop	09/10/2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	

**Resettlement Action Plan/Framework/Policy Process:**

Was the document disclosed <b>prior to appraisal?</b>	Yes
Date of receipt by the Bank	09/08/2014
Date of "in-country" disclosure	09/09/2014
Date of submission to InfoShop	09/10/2014

**Indigenous Peoples Plan/Planning Framework:**

Was the document disclosed <b>prior to appraisal?</b>	Yes
Date of receipt by the Bank	09/08/2014
Date of "in-country" disclosure	09/09/2014
Date of submission to InfoShop	09/10/2014

**Pest Management Plan:**

Was the document disclosed <b>prior to appraisal?</b>	
Date of receipt by the Bank	
Date of "in-country" disclosure	
Date of submission to InfoShop	

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**\* If the project triggers the Pest Management and/or Physical Cultural Resources, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.**

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**If in-country disclosure of any of the above documents is not expected, please explain why:**

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***C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)***

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**OP/BP/GP 4.01 - Environment Assessment**

Does the project require a stand-alone EA (including EMP) report?	No
If yes, then did the Regional Environment Unit or Sector Manager (SM) review and approve the EA report?	N/A
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	N/A

**OP/BP 4.10 - Indigenous Peoples**

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes
If yes, then did the Regional unit responsible for safeguards or Sector	Yes

Manager review the plan?  
 If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Sector Manager? N/A

**OP/BP 4.12 - Involuntary Resettlement**

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared? Yes  
 If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan? Yes

**The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank's Infoshop? Yes  
 Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs? Yes

**All Safeguard Policies**

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies? Yes  
 Have costs related to safeguard policy measures been included in the project cost? Yes  
 Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies? Yes  
 Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents? Yes

***D. Approvals***

<b><i>Signed and submitted by:</i></b>	<b><i>Name</i></b>	<b><i>Date</i></b>
Task Team Leader:	Ms Ayesha Y. Vawda	09/04/2014
Environmental Specialist:	Ms Nadia Sharmin	09/04/2014
Social Development Specialist Additional Environmental and/or Social Development Specialist(s):	Ms Sabah Moyeen	09/04/2014
<b><i>Approved by:</i></b>		
Sector Manager:	Mr Halil Dundar	09/10/2014
Comments:		