



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 01/10/2022 | Report No: ESRSC02391



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Maldives	SOUTH ASIA	P177768	
Project Name	Maldives Atoll Education Development Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	6/6/2022	8/30/2022
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Ministry of Education		

Proposed Development Objective

Enhance access to, and quality of, secondary education.

Financing (in USD Million)	Amount
Total Project Cost	10.00

**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]**

The proposed Project will support the Government of Maldives (GoM) to improve learning outcomes in science, mathematics and English in the general education system, with a special focus on the secondary education grades 7-10. The Project will also support the GoM to enable students to access vocational education opportunities in secondary education. The Project will also strengthen teacher performance through focused continuing teacher development initiatives and school-based teacher development programs. In addition, the Project will support the development and implementation of national assessments of learning outcomes for students at secondary grades with international modules. Further, the Project will assist the implementation of internal and external quality assurance and quality enhancement activities in schools. Finally, the Project will support coordination and monitoring, and technical assistance and communication.



#### 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 have a nation-wide coverage and project sites can be located on any inhabited islands. In terms of Geography, Maldives is an island nation in the Indian Ocean oriented north-south off India's Lakshadweep Islands. The Maldives consists of 1,192 coral islands grouped in a double chain of 26 atolls. The country's atolls encompass a territory spread over roughly 90,000 sq. km, making it one of the world's most geographically dispersed countries. Over 200 of its 1,192 islands are inhabited by the country's population, with an average of 5-10 islands in each atoll being inhabited islands that have infrastructure such as housing, roads and other facilities built in. A significant number of uninhabited islands in each atoll have also been converted to resorts and tourism facilities as well as infrastructure such as housing, industrial facilities and airports. The atolls are composed of live coral reefs and sand bars, situated atop a submerged ridge 960 km long that rises abruptly from the depths of the Indian Ocean. Maldives is noted as the country placed at the lowest elevation in the world, with maximum and average natural ground levels of only 2.4 m and 1.5 m above sea level, respectively. More than 80 per cent of the country's land is composed of coral islands which rise less than one meter above sea level. The islands consist of coral, sea grass, seaweed, mangrove and sand dune ecosystems which are of great ecological and socio-economic significance. Maldives is home to a number of ecologically sensitive marine habitats in shallow and intertidal zones which have been designated as protected areas by the Ministry of Environment Climate Change and Technology (ECCT) and these regions and any activities in their vicinity are monitored and managed. While the exact locations of project targeted atolls are not known, the key project institutions where the technical assessment and capacity building interventions will be focused on are located centrally in the Capital Island of Male. As the capital, Male is the most populous city in the Republic of Maldives, housing a population of around 133,412 individuals and an area of 9.27 square kilometer. As such, it is also one of the most densely populated cities in the world.

Over the last few decades, the Maldives has had several notable achievements, particularly in terms of access to education. Today, access to foundation and primary education are at near universal levels, a remarkable achievement for a country in which only 15 percent of children were enrolled in primary school three decades ago. Gender parity at the foundation and primary education levels is high. At the stage of primary education (grades 1-7), the net enrolment rate among both female and male students was almost 100 percent in 2019. At the lower secondary education stage (grades 8-10), the net enrolment rate among female students and among male students nearly 100 percent. At the stage of higher secondary education (grades 11-12) the overall net enrollment rate is 37 percent, with enrollment among girls at 56 percent and among boys at 21 percent. The low enrollment rate at higher secondary education level is mainly due to a limited number of schools that offer higher secondary education.

#### D. 2. Borrower's Institutional Capacity

The MoE and MoHE have extensive experience of implementing Bank funded projects and have a good track record of performance in environmental and social due diligence. The MoE and MoHE recently implemented Enhancing Education Development Project with concluded satisfactorily, achieving or exceeding all performance targets. The MoE and MoHE also has implemented Learning Advancement and Measurement Project which is performing satisfactorily. Prior Bank funded projects implemented by MoE and MoHE have also performed satisfactorily. To implement the Project successfully, the strengthening of project implementation including implementing the Stakeholder Engagement Plan, Labour Management Procedure, and Environment and Social Commitment Plan would be through support by a team of experts in academic areas, operations and monitoring, environmental and social who would assist the ministries, including atoll level officials such as Teacher Resource Center Coordinators, to implement



and monitor activities efficiently. The monitoring will take place at national, atoll, and school levels. Monitoring will identify problems and recommend actions to resolve issues and provide improved solutions for moving forward.

## 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 will assist the MoE mainly for soft interventions in terms of educational curriculum reforms to roll out two innovations to the secondary school curriculum,(i) a vocational skills option will be added to the secondary education grades and (ii) STEM subjects will be introduced in the secondary and higher secondary grades. The focus will be on science and technology, including ICT and digital technology, which have become increasingly important in the post-COVID19 world. Project will finance for Professional Development (SBPD) of teachers to continuously improve teacher motivation, pedagogical skills, competencies and performance. Further it has been designed to support measurement of school performance through quality assurance (QA) reviews consisting of both self-evaluation by schools and external evaluations by the Quality Assurance Department (QAD). In terms of physical interventions, the Project will provide funds to set up STEM laboratories and vocational skills workshops through the refurbishment of classrooms, the provision of equipment and technology, and the delivery of teaching-learning material including textbooks and supplementary reading material. In addition, the Project will assist the development of ICT laboratories, especially through the delivery of equipment and technology. Negative environmental impacts that have moderate risks are associated with the interventions under this project and are most likely in the form of civil works related impacts such as dust, noise and worker and public health and safety as well as waste generation during the rehabilitation works. These impacts are mostly localised and can be managed via Environmental and Social screening and management plans with appropriate site specific mitigation actions. The project will also finance the procurement of ICT equipment such as computers, TV screens and data storage devices that will lead to the generation of E-waste post the useful lifecycle of their use. Potential risks to the communities and environmental hazards related to the disposal of e-waste at the end of the lifetime of the equipment which will be provided to ICT laboratories will be mitigated via risk management measures that will include product specifications and “cradle to grave” provisions in the contracts of suppliers of electronic equipment's such as computers and other accessories in accordance with international best practice. Due to these reasons, the environmental risk is rated moderate at the concept stage.

#### Social Risk Rating

Moderate

The project intends to enhance access to, and quality of, secondary education through implementation of 4 components: Promoting curriculum diversification, Continuing teacher education and development, Measuring and enhancing student learning and school performance, and Coordination, monitoring, policy analysis, and technical assistance. Interventions will provide students with curriculum choices in VE and STEM, linked to labor market needs. To provide improved education the project will: refurbish classrooms and laboratories through obtaining proper equipment and technology, assist MoE to strengthen capacity and performance of principals and teachers in primary and secondary education, and enable GoM to improve and sustain system level quality enhancement measures such as national assessments of learning outcomes including international test modules, and quality assurance reviews based on internal and external quality assessments at school level. The project will support GoM to improve design and implementation of key education reforms. Strengthening VE and STEM curriculum options



will be transformation of the Maldivian education system as there is clear evidence of positive economic benefits and returns for VE and STEM curriculum options at the secondary education level. In the Maldives, these options are new and will over time transform the skills available among school graduates for the benefit of the economy. Social risks and impacts could be considered moderate given the increased risks due to the presence of children during refurbishment of facilities in school environments as the school becomes open to outsiders. There could be increased health and safety risks to construction workers and for children due to construction hazards leading to accidents & injuries, exposure to COVID19 infection from project workers and even risks around child abuse and harassment. In addition, refurbishment of facilities could disturb ongoing school activities. There is also possible risk of exclusion of vulnerable and eligible schools in remote Island/Atolls including teachers benefiting from the support of the project if the criteria is not designed in an equitable manner and if selection processes are not done in a transparent manner. The criteria is being discussed & expected to be finalized at the appraisal stage. However, initiatives on science and mathematics will benefit all schools. Before any building works are undertaken, the project will assess and seek to safeguard any risks to children and prepare construction work plans in consultation with school officials to minimize disruptions to school activities. Further all contractors will implement strict health and safety protocols including ensuring that workers are vaccinated, adhere to a child protection guidelines and sign a Code of Conduct. Finally, the project will ensure the selection of schools for support and teachers for training will be done in an equitable and a transparent manner in consultation with key stakeholders. A GRM will also be in place to address any grievances including a GRM for project workers.

## 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 project is classified to have 'Moderate risks' at the concept stage, after considering, the types of activities the project will support, which are mainly soft interventions such as education curriculum reforms and in terms of physical development, medium scale refurbishment activities to the existing buildings and establishment of ICT laboratories. The associated environmental impacts due to rehabilitation work will be most likely in the form of civil works related impacts such as dust, noise and worker and public health and safety as well as waste generation during the rehabilitation works. These impacts which are mostly localized and can be managed via Environmental and Social screening and management plans with appropriate site-specific mitigation actions. The scale and magnitude of potential impacts associate with the proposed activities will be rated as moderate as the specific locations and designs are not available at the concept stage.

The project also brings a number of positive benefits to the education sector through its design to support the achievement of the ESP's second goal, to provide youth with the necessary skills for employment and entrepreneurship through the secondary education curriculum. The AEDP will assist the Ministry of Education (MoE) to strengthen VE subjects and STEM subjects into the secondary and higher secondary education curricula. The focus will be on science and technology, including ICT and digital technology, which have become increasingly important in the post-COVID19 world.

Activities proposed under component 1 under the project include the setting up of STEM laboratories and vocational skills workshops through the refurbishment of classrooms, the provision of equipment and technology, and the delivery of teaching-learning material including textbooks and supplementary reading material. In addition, the



Project will assist the development of ICT laboratories, especially through the delivery of equipment and technology. The procurement of this equipment will lead to the generation of e-waste over the useful lifetime of their use which may result in the generation of electronic waste at the end of the useful lifecycle of these products. During the operational phase, minimal risks of fire hazards associated with faulty wiring and handling of electronic equipment are potentially expected. Environmental impacts during the the decommissioning phase will involve the generation of e-waste that will have to be managed via strict protocols and arrangements to ensure that sound management is undertaken over the lifetime use of these products in line with the regulations of the Maldives Waste Management Department and Environmental Protection Agency.

At this stage, the sites planned for refurbishment work are not known. Thus, to avoid or mitigate these risks related to the project, the Borrower will prepare an Environmental and Social Management Framework (ESMF) to provide adequate measures to be implemented during the implementation phase of the project. The ESMF will also cover activities relating to capacity building with trainings that will involve all project stakeholders.

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

The use of Borrower Framework is not being considered for the project. The project will comply with the World Bank’s new Environmental and Social Framework (ESF) and its Environmental and Social Standards (ESS), and will also be subjected to the national and local permits and clearances as per the existing legal-institutional framework.

**ESS10 Stakeholder Engagement and Information Disclosure**

The Project will help GoM to carry out a program of activities, including through the provision of sub-grants (school grants), designed to support measurement of school performance through quality assurance (QA) reviews consisting of both self-evaluation by schools and external evaluations by the Quality Assurance Department (QAD). The school self-evaluations will be conducted by stakeholders including principals, teachers, parents and local communities. This will enable extensive citizen engagement, including consultations, collection of stakeholder feedback, community participation in planning and decision making, and grievance redressal mechanisms. The QA process also provides opportunities for stakeholders, such as the principal, teachers, students, parents, and the local community to participate in planning and implementation of school development plans. The results of the quality assurance process will feed back into the school development plan, that would include the development of safe shelters in schools as part of the community disaster management plan, when necessary. The Project will provide school grants to enable schools to implement the recommendations of QA reviews to improve learning in the secondary and higher secondary grades. The analysis of stakeholders’ feedback will also examine gender related issues, so that timely action can be taken where needed. The needs of students, staff and stakeholders and management responses will also be incorporated in the school development plans. The relevant information on the implementation of these plans will be shared with the stakeholders. This QA process constitutes the citizen engagement mechanism for the Project. A Stakeholder Engagement Plan will be a key document for informing the QA process.

The Borrower will prepare and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to nature and scale of the project and associated risks and impacts. A draft of the SEP will be prepared and disclosed as early as possible and prior to Appraisal. The Borrower will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. NGOs, students, professional/workers’ organizations (including education affiliation and organization), women's groups, teachers’ unions parents’ associations/ local/ central/Atoll



authorities and departments, universities, /or other donors, could be considered stakeholders. If major changes are made to the SEP, a revised SEP should be publicly disclosed. The Borrower will engage in meaningful consultations with all stakeholders and establish procedures to ensure disclosure of information that will be accessible to all Maldivians as well as site specific disclosure within the atolls, local authority facilities, schools, and teacher resource centers. Information will also be disclosed on the World Bank website.

A GRM will be established as a part of project activities. Within the GRM, gender-sensitive measures will be put in place to address GBV or SEA/H reported cases. The GRM will be included in ESMFs, Stakeholder Engagement Plans, and Labor Management Plans.

## **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**

This standard is relevant as the project will impact on teachers, principals, senior management, and ministry and project implementation staff in the development of curriculum diversification and innovation; improving of teaching motivation, pedagogical skills, competency and performance. Additionally, labor will be required for the refurbishment of classrooms, workshops, and laboratories as well as possibility of associated OHS risks.

The extent of labor needs will be with regards to classroom rehabilitation. Although contractors would be encouraged to hire locally, in order to accomplish refurbishments, it is expected a small, temporary influx of labor will be needed. As such, all contractors and workers will be subject to Labor Management Plans, workers' rights, health and safety measures, and code-of-conduct clauses. Additionally, workers and local communities will be educated in gender equity and prevention of harassment and violence.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

Small scale refurbishment activities are expected under this project that could generate building construction and demolition wastes during implementation stage. The expected refurbishments are assessed to be of medium scale and in potential locations where anthropogenic activities have already altered the natural environment. The exact sites where these interventions will be implemented, and technical designs will only be available during project implementation. Rehabilitation activities may have potential site-specific environmental impacts during the implementation phase. These include the need for natural resources such as sand, water and aggregates, and the generation of dust and noise.

The project will also finance the procurement of ICT equipment such as computers, TV screens and data storage devices that will lead to the generation of E-waste post the useful lifecycle of their use. Potential risks to the communities and environmental hazards related to the disposal of e-waste at the end of the lifetime of the equipment, which will be identified as hazardous waste and may cause detrimental impacts to humans and to the environment if environmentally sound final disposal is not undertaken. As the Maldives does not have existing standards or requirements for management (including storage, transportation and disposal) of hazardous waste, international best practice guidance such as the World Bank Group's Sectoral Guidelines on Solid Waste Management and strict criteria on producer management of waste will be followed. These will be in line with both national legislation and applicable international conventions, including measures such as a buy back arrangement of





hazardous waste by the suppliers. Necessary actions, once identified will be proposed in the ESCP at the appraisal stage to fulfill major gaps that may be identified.

#### **ESS4 Community Health and Safety**

Project will finance for refurbishment of existing buildings in terms of physical developments and the locations will be mostly in highly populated areas. The associated environmental impacts to the local community due to rehabilitation work will be most likely in the form of civil works related impacts such as dust, noise and worker and public health and safety as well as waste generation during the refurbishment works. Thus, the project-resulted disturbance to local communities is expected to be limited mostly during construction phase . These impacts can be managed via Environmental and Social screening and management plans with appropriate site-specific mitigation actions. Effective community consultations can be conducted during design stage in order to identify the potential risks and mitigation actions, which will be implemented via ESMPs during project implementation stage. The SEP will engage and seek feedback from principals, teachers, parents, students, and local communities during which time concerns can be flagged and addressed. Responses will be incorporated into school development plans that will then guide management in maintaining a safe environment. The project will also assess and seek to safeguard any risks to children and prepare construction work plans in consultation with school officials to minimize disruptions to school activities. Further all contractors will implement and adhere to child protection protocols and sign a Code of Conduct.

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

This standard is not relevant as all works will be within existing schools and classrooms, which will be refurbished to meet TVET and STEM curriculum requirements.

#### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

All works will be conducted within existing facilities and no major construction or rehabilitation activities are expected in this project. Hence, likely impacts of the project on natural resources and biodiversity are not expected and this standard is considered Not Relevant. However, ESF screening processes in the ESMF will ensure that biodiversity aspects are taken into account in all project interventions, such as any recorded fauna/flora habitats within the site, which may be impacted and therefore require mitigation measures during refurbishment works.

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

This standard is not relevant as there is no evidence suggesting the presence of Indigenous Peoples.

#### **ESS8 Cultural Heritage**

This standard is not relevant as the project will not impact cultural assets. The project will not support any works or activity that would impact cultural heritage. However, chance find procedures and screening for any impacts for





tangible heritage will be included in the ESMF ensuring the cultural heritage aspects are taken into account in the E&S screening process

**ESS9 Financial Intermediaries**

This standard is not relevant as there will be no financial intermediaries.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?** No

**Financing Partners**

The project does not include any financing with partners.

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

**Actions to be completed prior to Bank Board Approval:**

1. Prepare and finalize draft Environmental and Social Commitment Plan (ESCP)
2. Prepare and finalize the Environmental and Social Management Framework of the AEDP operation in line with the ESF requirements and relevant ESSs.
3. Prepare ESIA TORs in line with the ESF and ESS requirements for any front runner sub- projects identified during project preparation.
4. Prepare a Stakeholder Engagement Plan (SEP) and GRM.
5. Prepare Labor Management Procedure, alongside GBV action plan.
6. Conduct a capacity assessment of the implementing Agencies as part of updating the AEDP ESMF and develop a time-bound E&S capacity enhancement plan, which will be incorporated into the ESCP.

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

- Capacity of project teams on identifying and managing environmental and social issues.
- Implementation of the Stakeholder Engagement Plan, and establishment and functioning of an effective GRM
- Implementation of Labor Management Procedure, including code-of conduct, and GBV Action Plan based on the GBV Good Practice Note.
- Implementation of sub-project specific ESF instruments such as ESIA, ESMP, etc.
- Preparation and implementation of an Occupational Health and Safety Management Plans, Community Health and Safety Plans.



**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

02-May-2022

**IV. CONTACT POINTS**

**World Bank**

Contact:	Harsha Aturupane	Title:	Lead Economist
Telephone No:	5723+306	Email:	daturupane@worldbank.org
Contact:	Karthika Radhakrishnan	Title:	Senior Education Specialist
Telephone No:	5770+6261 / 977-1-4236261	Email:	knair@worldbank.org

**Borrower/Client/Recipient**

Borrower: Ministry of Finance

**Implementing Agency(ies)**

Implementing Agency: Ministry of Education

**V. FOR MORE INFORMATION CONTACT**

The World Bank  
 1818 H Street, NW  
 Washington, D.C. 20433  
 Telephone: (202) 473-1000  
 Web: <http://www.worldbank.org/projects>

**VI. APPROVAL**

Task Team Leader(s):	Karthika Radhakrishnan, Harsha Aturupane
Practice Manager (ENR/Social)	Kevin A Tomlinson Recommended on 18-Nov-2021 at 16:35:37 GMT-05:00
Safeguards Advisor ESSA	Pablo Cardinale (SAESSA) Cleared on 10-Jan-2022 at 11:03:39 GMT-05:00

Public Disclosure