



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 07/19/2020 | Report No: ESRSC01407



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
India	SOUTH ASIA	P174067	
Project Name	Public Service Capability and Productivity Enhancement Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Governance	Investment Project Financing	9/10/2020	12/18/2020
Borrower(s)	Implementing Agency(ies)		
Government of India	Department of Personnel and Training, Ministry of Personnel, Public Grievances and Pensions		

Proposed Development Objective

To enhance technical and core competencies in select departments of Government of India

Financing (in USD Million)	Amount
Total Project Cost	100.00

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 builds on Gol’s newly formulated human resource transformation agenda. It will address the urgent need to operationalize an easy to access learning platform utilizing digital technology to build new capabilities and competencies for government officials, and to augment governance business continuity and resilience.

D. Environmental and Social Overview

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

The project development objective is to enhance technical and core competencies in select departments of the Government of India. It has three components, namely Component 1: Support for Development and Implementation of Competency Frameworks; Component 2 : Support for the Development of an Integrated Learning Platform and Content Creation; Component 3: Support for Developing Appropriate HR Policy Frameworks, Institutions, and Monitoring Systems.

The project is largely to be implemented in a virtual setting as it aims to impart training to Civil Servants in select departments of the central government. The various partner agencies, consultants, however would be located across the country.

D. 2. Borrower’s Institutional Capacity

The main implementation agency of this project -- Department of Personnel and Training (DoPT) is located in New Delhi. Currently DoPT has various part time consultants working to prepare the project including one person who is helping with E&S aspects.

However as elaborated in the risk sections below, given the nature of the proposed activities known at the Concept stage, the overall E&S risk rating is low and in that regard, based on the initial Due Diligence undertaken, the current borrower's E&S capacity is deemed adequate. However, during preparation, DoPT's current approach and capacity to manage environmental and social risks would be further assessed and areas for enhancing capacity, would be identified and suitable capacity enhancement measures would be suggested as necessary.

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

A. Environmental and Social Risk Classification (ESRC)

Low

Environmental Risk Rating

Low

The environmental risk rating is “Low” as the emphasis of the project is to enhance training capabilities for civil servants, methods and processes, upgrading of human resource skills and institutional reviews

At this stage, while no acquisition of IT equipment is envisaged, these might be considered during project preparation. While environmental risks are not expected at the time of IT procurement and adoption, appropriate procedures will need to be in place for disposal of equipment as per best environmental practices. The quantity of such equipment and associated cycle of replacement or upgradation will be identified during project preparation. A priori, associated environmental risks appear to be low as India has guidelines for the disposal of electronic waste under E- Waste Management Rules, 2016 (amended in March 2018) and Solid Waste Management Rules, 2016 for solid waste management.

The Bank team will ensure Environmental assessment and due diligence as part of preparation to understand; (a) current rules and practices of handling electronic and solid waste management, (b) staff capacity to handle such issues, and accordingly (c) develop E-waste management guidelines in line with India’s electronic and solid waste management Rules for implementation and supervision within project.

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Social Risk Rating

Low

Social Risk is rated as Low for the following reasons. As the PDO is to enhance technical and core competencies in select departments of the Government of India, the proposed interventions do not have any physical footprint and therefore will not result in adverse impacts on land, community health and safety, Indigenous Peoples/tribals or cultural heritage. The main social risks of the proposed project are related to:

- i) Possible exclusion of vulnerable individuals such as physically challenged civil servants if the digital content and platforms are not created with all beneficiaries in mind, such as those with disabilities and speaking/reading different languages etc.
- ii) Risks relating to labor too are minimal, as all likely types of workers (Direct, Contracted workers) are likely to have well defined employment terms and/or formal contracts in accordance with national labor laws. However, OHS provisions will apply to these workers in relation to the implementation of the project. Therefore, a Labor Management Procedure (LMP) will be prepared for the project that addresses these aspects e.g. includes a code of conduct for service contracts, setting up an Internal Complaint Committee; provisions to address COVID concerns and a GRM to redress grievances for this category of workers.
- iii) Stakeholders risks too are low, considering that DoPT has already prepared a preliminary Stakeholder Engagement Plan (SEP) that includes the list of all potential stakeholders as known at this stage besides details on modes and frequency of engaging with them. Such risks associated with Stakeholder identification and engagement will be addressed through the development of a communication strategy and more detailing of the SEP.

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:

Assessment indicates that potential exclusion, labor, possible e-waste management, SEA/SH and CE issues as the E&S risks.

- i. There could be possible exclusion of vulnerable groups i.e. those physically challenged, all intended beneficiaries may not be able to access the learning platform, if not mitigated by providing content in languages they speak/read and special provisions such as transcription, transliteration and subtitling are not provided to ensure equitable access to learning.
- ii. While all likely types of workers (Direct, Contracted workers) will have well defined employment terms and/or formal contracts in accordance with national labor laws, Sexual Exploitation and Abuse/Sexual Harassment at workplace and Occupational Health and Safety (OHS) and COVID concerns will be a risk.
- iii. Management and disposal of E-waste is identified as a key environmental risks, if such IT hardware is procured under the project.
- iv. Stakeholders risks could be there if all potential stakeholders are not identified and engaged through systematic approach. This would be addressed through a SEP and separate communication strategy.

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

No specific request has been made by the Borrower in respect of this aspect. However, India has disposal guidelines for electronic waste under E- Waste Management Rules, 2016 (amended in March 2018) and Solid Waste Management Rules, 2016 for solid waste management. These would be assessed for their adequacy to meet the requirements of the relevant ESS (ESS 3), if during project preparation these would be identified as an requirement.



ESS10 Stakeholder Engagement and Information Disclosure

During the preparation stage, various consultations meetings were held by the Implementing agency with relevant stakeholders to discuss various aspects such as: overall strategy of this entire program of Civil Services Capacity Building Reforms; review the capacity building models of other countries across the globe and their outcome; to discuss the approach and implementation of iGOT 2.0, specifically for the pre-foundation and common foundation courses/content; discuss the content/courses that can be leveraged from them in ready state for the platform. Such interactions and consultative meetings will continue during preparation and implementation as well.

Stakeholders identified at this stage include: Officials working in the government, across cadres and groups, in the Centre, States and Local bodies; State and Central departments, including training institutions under those departments – external stakeholders; Pilot users or the Champion Central Training Institutions (CTIs) – external stakeholders; Technology Service Provider – external stakeholders; Other third-party providers – external stakeholders; DOPT’s Programme Management Unit comprising of multiple agencies – external stakeholders; Knowledge partners and donor agencies – external stakeholders; Institutions playing a key role in managing and operating the Project (Capacity Building Commission, iGOT 2.0 SPV, Monitoring and Analysis Centre etc.) internal and external stakeholders.

A preliminary Stakeholder Engagement Plan has been developed to include actions identified for interactions within the various departments, and relevant training providers, content developers, hardware suppliers etc. A detailed Communications and Reporting Plan is being planned to help articulate the audience needs, key messages and appropriate channels which are integral to a seamless and professional operations. This will help to ensure clear and systematic communication with all stakeholders including project issues and risk management. The SEP will also present details of the grievance redressal mechanism to redress grievances from the various stakeholder, if any.

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. Civil Servants from select departments at the national government are the core beneficiaries of the project. Other professionals from various training institutions (ISTM) and many other private agencies will support the project in development of the learning platform and content/modules, delivery and evaluation, etc.

Therefore the project will involve: a) direct workers; b) contracted workers engaged in consultancy services firms (for developing content, providing training, data systems, portals, undertaking studies, and (c) primary supply workers/suppliers for primary equipment necessary for the project functions -- this category of workers will be determined during course of project preparation.

While aspects to employment terms etc. are well defined for Civil servants, there will be a need to ascertain extent of Occupational Health and Safety measure that are in place and what additional improvements are needed to meet the requirements of ESS2. In respect of other professionals, provisions of this ESS relating to Terms and conditions of employment, non-discrimination and equal opportunity, worker’s organizations and OHS aspects will apply – extent



of relevance will be further assessed during project preparation. Additionally, Sexual Exploitation and Abuse/Sexual Harassment at workplace and COVID related issues will be risks.

Hence, a LMP will be prepared that addresses these aspects e.g. includes a code of conduct for service contracts, besides setting of Internal Complaint Committee as is required under Prevention of Sexual Harassment at Workplace Act. The LMP will also include provisions to address COVID concerns and present a GRM for relevant category of workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant. The project intends to use modern technology and IT equipment to improve efficiency of data , processing, integration and dissemination. The use of IT/modern technology is encouraged in this project which is resource efficient. Though not envisaged at this stage, in case, procurement of IT hardware takes place, , e-waste and solid waste management at time of disposal will require attention. E-waste management guidelines in line with India’s electronic and solid waste management Rules for implementation and supervision within project will be developed.

ESS4 Community Health and Safety

This standard is not relevant. Since no construction or infrastructure development activity is envisaged under the project, project activities are not expected to cause risks and impacts to local communities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Not relevant. Project activities will not have a physical footprint and therefore will not result in any adverse impacts related to this ESS.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is not relevant. The project does not envisage any activities which have either direct or indirect impacts on bio-diversity or any living natural resource areas

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

Project activities will not have a physical footprint in any tribal areas and will not result in any impacts -- positive or adverse on tribal population. Hence this standard is not relevant.

ESS8 Cultural Heritage

This standard is not relevant as cultural assets are unlikely to be impacted by the activities currently envisaged.



ESS9 Financial Intermediaries

At this stage, No FI is expected to be involved

B.3 Other Relevant Project Risks

none anticipated at this stage

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

No Common Approach is being considered.

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

Actions to be completed prior to Bank Board Approval:

By Project Appraisal

1. An assessment would be undertaken of relevant Environment and Social Risks. Specifically it would focus on (a) if relevant understanding current practices of electronic and solid waste management, (b) assessing staff capacity to handle such issues, and (c) developing e-waste management guidelines in line with India’s electronic and solid waste management Rules for implementation and supervision. Any other E&S guidelines relevant to project activities, which the E&S risk assessment may identify, will be included in the ESCP.
2. Stakeholders Engagement Plan (SEP) detailing the varied set of stakeholders, modes of their engagement under the project, particularly in context of COVID induced constraints; and finally a GRM for the overall project.

By Board Approval

1. Notifications relating to establishment /operationalizing of GRM.
2. Labor Management Procedure that will comprise relevant SEA/SH, OHS provisions, including COVID considerations.

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

- i) Establishment/operationalization of Internal Complaints Mechanisms as required under Sexual Harassment Act

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- ii) Report on provisions relating to Disadvantaged and Vulnerable groups, if any e.g. course content, course delivery modes
- iii) A simplified e-waste and solid Waste Management guidelines for DoPT
- iv) Periodic Reporting on implementation of LMP implementation (including information on COVID related considerations)
- v) Notifications relating to establishment /operationalizing of GRM
- vi) Annual report on implementation of activities proposed under Stakeholder Engagement Plan (HR Summit etc.)

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

31-Aug-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Government of India

Implementing Agency(ies)

Implementing Agency: Department of Personnel and Training, Ministry of Personnel, Public Grievances and Pensions

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Vikram Menon
Practice Manager (ENR/Social)	Christophe Crepin Recommended on 06-Jul-2020 at 10:56:21 EDT
Safeguards Advisor ESSA	Agnes I. Kiss (SAESSA) Cleared on 19-Jul-2020 at 15:15:25 EDT

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