



**Islamic Republic of Pakistan**

**EMERGENCY ACTIONS TO STRENGTHEN PERFORMANCE FOR INCLUSIVE  
AND RESPONSIVE EDUCATION (ASPIRE) PROJECT  
(P173399)**

**Environmental and Social Systems Assessment**

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## Abbreviation and Acronyms

ASPIRE	Actions to Strengthen Performance for Inclusive and Responsive Education
COVID-19	Corona Virus Disease of 2019
CPF	Country Partnership Framework
CPS	Country Partnership Strategy
DLI	Disbursement Linked Indicator
EHSS	Environment, Health, Safety and Social
EIA	Environmental Impact Assessment
EPD	Environmental Protection Department
ESED	Elementary and Secondary Education Department
ESF	Environmental and Social Framework
ESSA	Environmental and Social Systems Assessment
FY	Fiscal Year
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HCI	Human Capital Index
IBRD	The International Bank for Reconstruction and Development
ICT	Information and Communications Technology
IDA	International Development Association
IEE	Initial Environmental Examination
IMF	International Monetary Fund
IT	Information Technology
KPK	Khyber Pakhtunkhwa
MHM	Menstrual Hygiene Management
MoFEPT	Ministry of Federal Education and Professional Training
NEP	National Education Plan
NGO	Non Governmental Organization
NOC	No Objection Certificate
O&M	Operation and Maintenance
OOSC	Out of School Children
PAP	Program Action Plan
PDO	Project Development Objective
PFM	Public Financial Management
PforR	Program for Results
PITB	Punjab Information Technology Department
PREP	Pandemic Response Effectiveness in Pakistan
RA	Result Area
SED	School Education Department, Government of Punjab
SED	Secondary Education Department, Government of Balochistan
SELD	School Education and Literary Department, Government of Sindh
SHIFT	Securing Human Investments to Foster Transformation
SOP	Standard Operating Procedure
TA	Technical Assistance
TVET	Technical and Vocational Education and Training
WASH	Water, Sanitation and Hygiene
WB	World Bank
WHO	World Health Organization

## EXECUTIVE SUMMARY

### Introduction

1. This Environmental and Social Systems Assessment (ESSA) has been prepared by the World Bank ESSA Team for the proposed Actions to Strengthen Performance for Inclusive and Responsive Education (ASPIRE), which will be supported by the World Bank's Program for Results (PforR) financing instrument. In accordance with the requirements of the World Bank Policy Program-for-Results Financing (PforR Policy), PforRs rely on borrower's systems for the management of environmental and social effects. The PforR Policy requires that the Bank conduct a comprehensive ESSA to assess the degree to which the relevant PforR program's systems promote environmental and social sustainability and to ensure that effective measures are in place to identify, avoid, minimize, or mitigate adverse environmental, health, safety, and social impacts.

2. The main purposes of this ESSA is to: (i) identify the program's environmental and social effects, (ii) assess the legal and policy framework for environmental and social management, including a review of relevant legislation, rules, procedures, and institutional responsibilities that are being used by the program; (iii) assess the implementing institutional capacity and performance to date to manage potential adverse environmental and social issues; and (iv) recommend specific actions to address gaps in the program's environmental and social management system, including with regard to the policy and legal framework and implementation capacity.

### Program Description and Potential Environmental and Social Effects

3. The SPIRE Program is part of a package of support that the World Bank, in alignment with other development partners, has developed to help Pakistan's efforts to speed up the Response, Recovery, and Resilience of the education system in light of COVID-19. The current Program will contribute both short- and long-term interventions to accelerate Recovery of a better education system while promoting equity through establishment of a new system of incentives for provinces to invest in the most disadvantaged geographical areas and encourage uptake of alternate modes of education service delivery. Meanwhile, COVID-19 Response, Recovery and Resilience in Education Project (P174223), through a Global Partnership for Education (GPE) grant, focuses on the immediate support for Response and Recovery while establishing some foundations for medium-term investments. The package will provide a platform for better education planning for emergencies, coordination, and alignment between federal and provincial governments with a focus on the most disadvantaged geographical areas. It could also provide other partners with the opportunity to join with technical and financial contributions. In addition, other international partners have already shown interest in aligning some of their support to the government's Program and hence the actions under this package.

4. The Program Development Objective (PDO) is to support the government to: (i) respond to school disruptions caused by the COVID-19 pandemic; (ii) recover access and improve education quality; and, (iii) enhance sector resilience through better coordination, with a focus on disadvantaged areas and vulnerable populations.

5. **Results Area 1. Response, Recovery and Resilience: Enhanced targeting of COVID-19 education response.** This Results Area would enhance targeting of the COVID-19 education response, with a focus on disadvantaged districts. The Program would expand the initial GoP investments for distance learning in lagging areas of each province and support actions to guarantee safety in school reopening. It would also prioritize immediate actions to expand both the demand

and, supply for education services. In particular for girls and young women. Actions to support girls' re-enrollment will include both communication campaigns, linked with behavioral nudges, that will engage community members, and also structural improvements to schools. The Program would, among other things: (a) adapt and further develop distance learning content to make it relevant and sensitive to disadvantaged groups (e.g. girls, OOSC); (b) adapt and distribute materials to students in lagging districts (digitally, and by phone, printed materials, or otherwise); (c) design and implement strategies to incentivize demand for distance learning and for returning to school, including communications and enrollment campaigns; (d) carry out actions to guarantee the safe return to schools of teachers, students and administrators, including awareness training for teachers, the design and implementation of safety protocols, and the provision of masks, sanitizer, and cleaning products; and, (e) support student and teachers' mental and emotional health. Actions will be adapted to the needs of provinces and lagging areas and will focus on implementable solutions to engage students in learning while keeping schools safe.

**6. Results Area 2. Improved learning opportunities for OOSC and at-risk students.** This Results Area aims to expand equitable access to education by engaging OOSC through both traditional and flexible multimodal education approaches that will provide them with a pathway towards education certification. These activities will build on existing efforts to establish and expand distance learning programs in response to the COVID-19 pandemic as well as expansion of existing public schools. The Program would focus on incentivizing implementation of multi-modal (distance or face-to-face) learning opportunities for primary- and middle-school-aged children, with a priority for expanding access to OOSC and girls. This will be achieved by supporting lagging areas to expand education services, which are critical for the recovery and return phases, while making them more inclusive and differentiated towards student needs. To achieve this, the this Results Area will focus on, among others: (a) aligning distance learning guidelines with student and teacher national education standards; (b) expanding multimodal and traditional education services; (c) implementing communications and outreach campaigns targeting girls and OOSC; (d) enhancing teacher capacity to assess students and adapt learning content; (e) supporting the design and implementation of accelerated learning programs, including pedagogical material, distance teacher training, information and communications technology, and others; (f) improving existent public infrastructure, including construction of new classrooms or reconfiguration of existing spaces, connectivity, toilets, and enhanced WASH facilities (while using energy-conserving approaches that are environmentally sustainable, wherever possible).

**7. Results Area 3. Stronger federal-provincial coordination and management.** This Results Area would strengthen data systems, research, and planning with the aim of improving sector coordination and management. The actions in this Results Area will better prepare the education system to deal with future disruptions to the sector and improve sector management. The Program will, among other things, support improvements in data systems including those that will establish a broader monitoring and evaluation framework that would reconcile education data gaps/duplications (particularly those related to indicators measuring girls' progress), streamline reporting against national and international commitments, and support transparent data reporting on student outcomes. The Results Area would also support knowledge sharing and innovative local and global intervention design and evaluations in order to improve policymaking and planning, on distance learning, school management, teacher training and coaching, accelerated learning programs, educational technology, and other pedagogical strategies. The Program also aims to support reforms that digitize government processes for improved planning and management, for example e-audits and education data management systems and will include linkages to larger reforms on public financial management (PFM) in coordination with other World Bank operations. With improved analysis and planning capabilities, and support from local, private sector and development partners, the GoP will be better positioned to respond, recover, and build back a better

education system. Results Area 3 will also support the country's capacity to carry out national and international student assessments and the better use of data to improve classroom practice. Finally, the Results Area will also support low-cost interventions to incentivize behavioral change by teacher, students, and parents.

### Social and Environmental Effects

**8.** Consistent with the requirements of the Bank PforR Policy, the proposed Program does not support activities that pose high environmental or social risks. The activities to be supported by the Program are likely to provide environmental and social benefits, and low adverse environmental and social impacts and risks. Hence the ESSA finds the program suitable for PforR operation.

**9.** Most of the activities under Result Area-2 can cause environmental risks related to WASH activities. Improvement in WASH (Water, Sanitation and Hygiene) infrastructure at schools will pose environmental risks if these facilities are not properly constructed and managed. The WASH infrastructure includes toilets and sewerage, drinking water and hygiene facilities (washbasins). The potential environmental and health risks are associated with WASH facilities if there is shortage of water supply at toilets and washbasins, inappropriate treatment and disposal of sewage from the toilets, non-potable drinking water facilities and the limited supply of hygienic products (soaps, germicidal/disinfectants) and substandard hygienic services (washing, cleaning and disposal of waste) at schools. Safe water supply is a challenge for most of the schools in Pakistan in general, and particularly schools located in the underground brackish water zones in southern Punjab, Sindh and Balochistan. Students and teachers are facing health risks due to contaminated water supplies in schools.

**10.** Provision of hygiene products such as soaps and germicidal/disinfectants, and hygiene services i.e. washing and cleaning of toilets, floors and furniture and proper handling and disposal of solid waste will be important for the upkeep of school hygiene condition. In case if these services and product supplies are compromised at schools, the consequential unhygienic condition will affect children health and increase their absenteeism from schools. Under COVID-19 pandemic episode, if school operations are continued without following SOPs, there are utmost chances of corona virus infection among students, school staff and the community.

**11.** The provision of safe environment, drinking water supply, sanitation and improvised/renovated classroom for students in the disadvantaged schools will likely lead to better health outcomes for students and increase opportunities to learn. WASH interventions will contribute to improve the school environment and make the schools more conducive for the students to achieve quality of education.

**12.** Effective design and implementation of distance learning will help in returning the affected students, reduce the OOSC and at-risk students, enhance enrollment rate at schools, and significantly reduce the learning poverty of the country. Implementation of effective communication and outreach campaign in lagging areas, with special focus on girls and young women of the community will increase the education demand. However, development and implementation of effective distance education system in the lagging areas will be a challenging task. The design of these systems should be appropriate to the socio-cultural norms and needs of the lagging areas.

**13.** Construction/rehabilitation works will be carried out within the school premises. Land acquisition will not be required, and it is not part of the Program. Any loss or conversion of natural habitats and any changes in land or resource use are not expected. Low level short-term environmental impacts may occur in the form of drainage clogging/wastewater ponding, dust

pollution, noise pollution, soil pollution, occupational health hazards due to improper management of sanitary and hazardous waste (including the asbestos from the existing facilities while rehabilitation work). Construction activities will cause temporary disruption of school activities. There will be also low level of risk to public and worker health and safety at construction sites.

**14.** There are many socioeconomic factors contributing high dropout rate, at risk and OOSC in general and particularly at disadvantaged areas of the country. If these social factors are not given due consideration in developing and implementing distance or other education mechanism and communication and outreach campaign to mobilize students and community, there can be potential risks that the dropout rates will not be reduced and the OOSC could not be mobilized.

**15.** There are chances of encroachers at schools premises (shops, peddlers/hawkers, huts etc.) which need to be removed prior to construction of new classrooms in the schools. This aspect can lead to dispute among school administration and the encroachers. The involvement of construction workers at school premises during school operation can lead to high risk environment for Sexual Exploitation, Abuse and Harassment (SEAH) for children, young girls and female teachers. SEAH can also be among workers where females and children are involved in the construction activities. Under COVID-19 pandemic episode, if construction work is continued without following SOPs, there are utmost chances of corona virus epidemic among workers, students, school staff and the community.

**16.** The activities of digitizing government processes will be ICT based. These would require the procurement of several types of IT equipment items and devices for use by the different educational departments of the program. By virtue of ICT equipment use, electronic waste (e-waste) is expected to be generated at the start of the program (replacing redundant ICT equipment) and by the end of life service of the procured equipment. The environmental and health and safety impacts occur during the recycling and disposal of the e-waste. If e-waste is recycled and disposed under improper extraction facilities (for example for copper and gold etc.) and disposal arrangements then the environment and the health and safety impacts will occur in the form of discharge of heavy metals in the environment and risks to the health of the associated workers and communities.

**17.** Increased use of digital tools in education departments could be detrimental to employees who have low levels of IT literacy and knowledge. These employees can be marginalized. However, this risk can be turned into opportunity by providing training to these employees and upscaling their ICT knowledge through TA component so that they could remain in the mainstream.

### **Assessment of Environmental and Social Management Systems and Implementation Capacity**

**18.** The environmental and social management under the program is largely based on the existing legal, regulatory, and institutional system in Pakistan and the provinces. The applicable environmental and social management systems are generally found to be adequate to address underlying environmental and social risks. For the environmental risks, the federal and provincial environmental protection aspects are governed by the federal and provincial Environmental Protection Acts. Social aspects are considered under Local Government Acts, province wide online Grievances Redress System, provincial Transparency and Right to Information Acts, and Provincial Ombudsman Offices. The ESSA identified gaps in some areas, as summarized below, which will need to be addressed through the Program Action Plan (PAP).

- (a) **WASH in schools is not effectively covered by the system and the system lacks capacity to monitor WASH activities in schools.** The Education Departments do not have specific standards and guidelines for WASH facilities and supply of water and drinking water to the schools and enforcement mechanism. Limited inspection is conducted under the school inspection system of Education Departments. Resultantly, large percentage of schools are without WASH facilities and wherever they are available they are not maintained and operated to desired standards. Provincial EPAs only take actions after complaints are registered. It is rare that EPAs conduct the environmental monitoring of schools in the provinces.
- (b) **Limited enforcement of the OHS laws in the provinces for workers safety:** There are two provincial laws i.e. The Punjab Occupational Safety and Health Act, 2019 and The Sindh Occupational Health and Safety Act, 2017 in the country which focus on the safety of the construction workers. However, there is limited enforcement of the provincial OHS laws in the provinces. The inspectors don't have the capacity to enforce these laws in the provinces.
- (c) **Limited consultations by the Education Departments with the indigenous people (Kalash people) for program intervention:** There is no system at the Elementary and Secondary Education Department, KPK, to undertake free, prior and informed consultations with the Kalash people to determine broad community support for the education projects to be started at Kalash valley.
- (d) **A procedural gap in planning and development of projects regarding vulnerable people.** Education Departments are not required under operational procedures to consult vulnerable groups (poor, landless, ethnic and religious minorities, disabled, women, etc.) for their inputs while designing and developing interventions that can have perceivable impacts on them.
- (e) **Lack of integration within multiple GRM systems.** There are multiple GRMs operational in different forms. Existing Grievance Redress Mechanism has spread in the system of Provincial Governments and departments. There is a need for the Program specific GRM system to be developed and implemented by borrowers.
- (f) **No specific legal provisions are available for e-waste management.** Currently, regulations on e-waste management is lacking in the country. Furthermore, the educational departments do not have any rules/ procedures for the safe handling and disposal of end of life ICT equipment. The e-waste recycling facilities are operating in informal sector and are not regulated under any regulations.

**19.** The Review of IEE and EIA Regulations of Federal, KPK and Balochistan do not require filing of IEE or EIA for the construction or expansion of schools. Punjab regulation requires filing of IEE performa for the construction of rural schools only (not the urban schools) under Schedule III. Construction or expansion of new classrooms/WASH facilities do not require IEE performa. Sindh regulation requires filing of IEE for the construction of educational, academic institutions on land less than 10 acres under Schedule I and filing of environmental screening through checklist for rural schools. Construction or expansion of new classrooms/WASH facilities do not require IEE/screening checklist.

**20.** There is no system of environmental and social assessment of the activities and programs executed by the education departments in different provinces. Environmental and social assessment studies are not carried out to evaluate and manage environmental and social risks associated with

the education activities. There is no department/section in any of the education departments and no person is dedicated for the environmental and social assessment, studies or the surveys.

## **Disclosure and Consultations**

**21.** This draft ESSA is being disclosed in-country and on the World Bank's external website, prior to formal appraisal of the relevant PforR, to serve as the basis for discussion and receipt of formal comments. Due to COVID lockdown, meetings through webex and zoom were conducted with the officials of the Ministry of Education and provincial Education Departments. ESSA will be submitted to Ministry of Education and provincial Education Departments for comments. Later on online workshop will be organized to make the presentation to the stakeholders for comments. Comments raised by stakeholders will be incorporated in ESSA and the revised ESSA will be disclosed in-country and on the World Bank's external website prior to Board consideration.

## **Input to the Program Action Plan (PAP)**

**22.** To address the institutional and capacity gaps identified through the ESSA process, the ESSA team gives the following recommendations, which are inputs to the PAP:

**23. Recommendation 1:** The Ministry of Federal Education and Professional Training, in collaboration with the partner provincial Education Departments, and provincial EPAs should Prepare Environment, Health, Safety and Social (EHSS) Guidelines for the Program to address WASH issues and construction activities. EHSS Guidelines should include WASH standards, inventory of WASH facilities, and hygiene products and services, O&M guidelines, sewage and solid waste treatment and disposal guidelines and monitoring and evaluation procedures to ensure WASH sustainability at schools. MoFEPT, in consultation with provincial education departments, and provincial EPAs, should incorporate Construction SOPs in the proposed EHSS Guidelines to ensure that the construction/expansion or renovation activities at schools are carried out under safe and environmentally controlled manner to protect environment, workers and the community from potential risks.

**24. Recommendation-2:** The program teams in the Ministry of Federal Education and Professional Training and the provincial education departments should be trained for the implementation of EHSS Guidelines as part of the capacity-building activities under the program. The Environment and Social (E&S) focal persons with sufficient experience and qualification to achieve environmental and social compliances under EHSS Guidelines should be designated in the Ministry of Education, and provincial education departments.

**25. Recommendation-3:** Social assessment should be carried out in order to assess the vulnerability, impediments and susceptibility of the vulnerable people and the indigenous people. The purpose of the social assessment is to inform the vulnerable groups and the indigenous people about the program activities and give due consideration to their needs and social constraints in designing program activities. The study will help in designing and implementing distance education and the outreach campaign at different disadvantaged areas.

**26. Recommendation-4:** The employees of the Education Departments should be trained on use of ICT and smart technologies. This training will be beneficial for the employees, lacking in digital knowledge, to keep them in the mainstream to avoid social divide and distress among them.

**27. Recommendation-5:** The Ministry of Federal Education and Professional Training in collaboration with the educational institutions should develop Standard Operating Procedures

(SOPs) for the procurement and disposal of e-waste based on current World Bank's Environment, Health and Safety (EHS) Guidelines, based upon general and industry specific examples of Good International Industry Specific Practices (GIIPs). Similar recommendation was made for the World Bank funded 'Punjab Public Resource Management Program' for development of e-waste management SOPs. Both programs can coordinate for the development of SOPs.

**28.** The proposed budget for the ESSA Action Plan will be US\$ 95,000.

## I. INTRODUCTION

### A. Environmental and Social Systems Assessment: Purpose and Objectives

1. This Environmental and Social Systems Assessment (ESSA) has been prepared by the World Bank ESSA Team for the proposed Actions to Strengthen Performance for Inclusive and Responsive Education (ASPIRE), which will be supported by the World Bank's Program for Results (PforR) financing instrument. In accordance with the requirements of the World Bank Policy Program-for-Results Financing (PforR Policy), PforRs rely on borrower's systems for the management of environmental and social effects<sup>1</sup>. The PforR Policy requires that the Bank conduct a comprehensive ESSA to assess the degree to which the relevant PforR program's systems promote environmental and social sustainability and to ensure that effective measures are in place to identify, avoid, minimize, or mitigate adverse environmental, health, safety, and social impacts. ESSA based on comprehensive assessment makes recommendations to enhance environmental and social management within the program as part of the overall management action plan.

2. The main purposes of this ESSA is to: (i) identify the program's environmental and social effects, (ii) assess the legal and policy framework for environmental and social management, including a review of relevant legislation, rules, procedures, and institutional responsibilities that are being used by the program; (iii) assess the implementing institutional capacity and performance to date to manage potential adverse environmental and social issues; and (iv) recommend specific actions to address gaps in the program's environmental and social management system, including with regard to the policy and legal framework and implementation capacity.

3. This ESSA assesses or considers the extent to which the program's environmental and social management systems are adequate for and consistent with six core environmental and social principles contained in paragraph of Section III of the PforR Policy (hereafter, Core Principles), as may be applicable or relevant under PforR circumstances. The Core Principles are listed below. These are further defined in detail through corresponding Key Planning Elements that are included under each Core Principle in Section III.

- (a) **Core Principle 1: *Environmental and Social Management***: Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in program design, (b) avoid, minimize, or mitigate against adverse impacts; and (c) promote informed decision making relating to a program's environmental and social effects.
- (b) **Core Principle 2: *Natural Habitats and Physical Cultural Resources***: Environmental and social management procedures and processes are designed to avoid, minimize, and mitigate any adverse effects (on natural habitats and physical cultural resources) resulting from the program.
- (c) **Core Principle 3: *Public and Worker Safety***: Program procedures ensure adequate measures to protect public and worker safety against the potential risks associated with (a)

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<sup>1</sup>"Effects" is used throughout this report to refer collectively to benefits, impacts, and risks. The subsumed terms are used where necessary to focus on specific topics or issues. The term "benefits" include positive impacts, and the term "impacts" refer to adverse or negative consequences.

construction and/or operations of facilities or other operational practices developed or promoted under the program and (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials

- (d) **Core Principle 4: *Land Acquisition***: Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.
- (e) **Core Principle 5: *Indigenous Peoples and Vulnerable Groups***: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits, giving special attention to the rights and interests of indigenous peoples and to the needs or concerns of vulnerable groups.
- (f) **Core Principle 6: *Social Conflict***: Avoid exacerbating social conflict, especially in fragile states, post conflict areas, or areas subject to territorial disputes.

**4. An additional purpose of this ESSA is to enable informed decision making by the relevant authorities in the borrower country and to aid the Bank's internal review and decision process associated with the ASPIRE.** The findings, conclusions and opinions expressed in this document are those of the World Bank. The recommended actions that flow from this analysis have been discussed and agreed with the Ministry of Federal Education and Professional Training (MoFEPT) and will become legally binding agreements under the conditions of the new loan.

## **B. ESSA Methodology**

**5.** The World Bank undertook the following actions as part of the assessment from May-June 2020: (a) a comprehensive review of federal and provincial government policies, legal frameworks and program documents, and other assessments of the implementing departments' environmental and social management systems (b) consultations were done with relevant experts and officials from Ministry of Federal Education and Professional Training, School Education Department-Punjab, School Education and Literary Department-Sindh, Elementary and Secondary Education Department- Khyber Pakhtunkhwa, Secondary Education Department-Balochistan, and Environmental Protection Agencies/Departments of four provinces.

**6.** This report is prepared by the World Bank staff and consultants through a combination of reviews of existing program materials and available technical literature, interviews with government staff, and consultations with key stakeholders and experts. Findings of the assessment will be used in the formulation of an overall Program Action Plan (PAP) with key measures to improve environmental and social management outcomes of the program. The findings, conclusions, and opinions expressed in the ESSA document are those of the World Bank. Recommendations contained in the analysis were presented and discussed during the meetings with the concerned program implementing departments before finalization and disclosure of the ESSA.

**7.** The ESSA review process seeks to describe and assess the systems for managing environmental and social effects of a proposed program. In between May-June 2020, the World Bank drew on a wide range of data, sources, and inputs during the ESSA review process, including the following actions:

- (a) **Assessment of the environmental and social effects of the program:** The ESSA Team assessed the potential for the program to cause adverse environmental and social effects, either due to its design and program components or due to gaps in program systems.
- (b) **Comprehensive desk review of policies, legal framework, program documents, and other assessments of environmental and social management systems:** The review examined the set of national/provincial policy and legal requirements related to environment and social management associated with the activities described under the program results areas. The review also examined technical and supervision documents from previous and ongoing World Bank projects and programs whereby ESSA's were produced (Punjab Cities Program, Punjab Public Resource Management Program, Khyber Pakhtunkhwa Revenue Mobilization and Public Resource Management, etc.).
- (c) **Institutional analysis:** An institutional analysis was carried out to identify the roles, responsibilities, and structure of the relevant institutions responsible for implementing the ASPIRE funded activities, including coordination between different entities at the provincial and federal levels. The assessment of the capacity of key institutions to implement required environmental and social management actions was assessed. An important input for this assessment was an evaluation of these institutions' previous track record in management of such risks in the context of previous projects and programs.
- (d) **Consultations and interviews:** Online consultations were done through webex and zoom meetings, and interviews were conducted through structure questionnaires with relevant experts and officials from Ministry of Federal Education and Professional Training (MoFEPT), School Education Department-Punjab (SED), School Education and Literary Department-Sindh (SELD), Elementary and Secondary Education Department-Khyber Pakhtunkhwa (ESED), Secondary Education Department-Balochistan (SEDB), and four provincial Environmental Protection Agencies/Department.

**8.** This draft ESSA has been updated based on the feedback received from stakeholders and experts prior to finalization of the program. The final ESSA will be disclosed prior to Bank's Appraisal of the program. It will be updated to be finalized before Board approval, if needed, to reflect any important changes agreed during Negotiation of the program that affect environmental and social issues.

## II. PROGRAM DESCRIPTION AND POTENTIAL ENVIRONMENTAL AND SOCIAL EFFECTS

### A. Country Context

**9. Pakistan is at a crossroads as it deals with the corona virus disease (COVID-19) pandemic.** Periodic macroeconomic crises and a low human capital (HC) basis have constrained the country's growth prospects. Over the last two decades, economic growth in Pakistan has averaged at 4.4 percent a year, below the South Asian annual average of 6.3 percent. Low investment in human capital, slow progress of structural reforms, low private investment, and slow export growth due to an overvalued currency, among others, have hindered growth prospects. The country was making good progress in stabilizing its economy and implementing much needed structural reforms. However, the COVID-19 pandemic will have significant negative impacts on the economy. The closure of businesses and disruption to the supply chains are significantly affecting the services and manufacturing sectors, which account for nearly 80 percent of total gross domestic product (GDP). The impact of the ongoing economic disruption is expected to contract GDP by 1.3 percentage points in FY20.

**10. There was a consistent and significant decline in poverty in Pakistan over the 14 years from 2001 to 2015, during which the poverty headcount measured using the national poverty line fell from 64.3 percent to 24.3 percent.** These gains are likely to be reversed due to the COVID-19 pandemic and its associated containment measures. The challenges of poverty reduction can be further affected by climate change and disaster risk-related vulnerabilities. The economic contraction is expected to contribute to a sizeable increase in poverty, reversing the trend of sustained poverty reduction observed over the 14 years. Urban workers employed in the informal sector and daily wage workers employed in the formal sector will bear the brunt of the slowdown. In rural areas, expected decline in off-farm employment opportunities is also likely to increase vulnerability to shocks of households relying on agriculture. It is important that the government prioritizes investments to ensure poverty reduction and human capital losses are quickly offset to bounce back strongly.

**11. Human capital accumulation is low and the impact of COVID-19 pandemic puts at risk some of the gains made in recent years.** According to the World Bank Human Capital Index (HCI), if no improvements in health and education service delivery take place, a Pakistani child born today is expected to be only 40 percent as productive as s/he could be by age 18. With a large share of births taking place outside health facilities (33.8 percent), and low immunization rates (65.6 percent) children are deprived of a strong start to life. High rates of malnutrition and low learning outcomes contribute to the country's low HCI: 37.6 percent of Pakistani children under age five are stunted; and learning poverty is very high with 75 percent of Pakistani children not being able to read and understand a short age-appropriate text by age 10.

**12. Pakistan has adopted a holistic approach to human capital accumulation and protecting human capital is at the core of the country's response plan to address the COVID-19 pandemic.** The Government of Pakistan (GoP) embarked on a set of reforms and interventions, including: (a) the launch of a national poverty alleviation program: 'Ehsaas'; (b) expansion of quality primary health care (PHC) for improved health, nutrition and population outcomes through a 'life cycle' approach; (c) a focus on learning in primary education to decrease learning poverty by half in a decade; and (d) revision of legislation for women's empowerment and increased participation in the labor force. In order to respond to the COVID-19 pandemic,

Pakistan has strengthened health service delivery and used safety nets to protect the vulnerable. Ehsaas has been one of the main instruments to mitigate the COVID-19 impact through its cash assistance package. The World Bank is supporting the GoP in this agenda through preparing the Pandemic Response Effectiveness in Pakistan (PREP) project and repurposing eight ongoing projects to quickly mobilize funding for urgently needed response and mitigation measures. The second phase of the COVID-19 response will focus on interventions to mitigate socio-economic impacts and support for the medium-term reform agenda so that Pakistan can rebound stronger as the COVID-19 crisis subsides. Earlier this year, the Punjab Human Capital project was approved by the World Bank and a similar project is under preparation in Balochistan.

## **B. Sectoral and Institutional Context**

**13. Education service delivery in Pakistan is the responsibility of provincial governments.** The 18th Constitutional Amendment made the provinces responsible for delivering educational services to their residents. In this new administrative arrangement, post-2010, the federal government has an overarching responsibility in ensuring that all citizens have reasonably comparable access to educational basic services regardless of their place of residence. All provinces have developed education sector plans allocating a large share of their budgets to the sector. However, the current setup lacks interprovincial coordination to achieve objectives at the national level, and checks and balances on the arrangements are weak, resulting in high inequality in educational outcomes, low-quality data at the country level to measure national and international commitments and improve educational policy.

**14. Even before the COVID-19 pandemic, the education system in Pakistan faced substantial challenges in access, quality, and management.** Before the COVID-19 pandemic, Pakistan had the second highest out-of-school population in the world, estimated at 22.8 million children (or 44% of all 51.5 m children) who are not attending primary or secondary education. Learning poverty was high: 75 percent of 10-year olds cannot read and comprehend an age-appropriate text. In addition, the education system is highly inefficient with high repetition and retention rates. In Sindh, for example, out of 100 students who enter grade 1, only 51 complete grade 5 and only 30 reach grade 6 (middle) school. The presence of private service providers, is large in most provinces, accounting for between 10 to 40 percent of overall school enrollment.<sup>2</sup> The system also shows stark difference on enrollment by gender: in primary education the Gross Enrollment rate is 82 percent for girls versus 98 percent for boys. In this panorama, the lack of coordination and collaboration among provincial and federal governments on education also limited a faster pace of improvement.

**15. The COVID-19 pandemic has had an immediate effect on the education system.** The Government of Pakistan (GoP) has extended the lockdown until April 30, with increased restrictions on movements, particularly in places with higher concentration of confirmed COVID-19 cases. The GoP has also decided the nationwide closure of all educational institutions until May 31, 2020. This applies to all public and private schools, colleges, universities, vocational institutions and religious institutes. The closure will be treated as summer vacations. The government has also postponed all examinations including universities, federal and provincial boards, Cambridge and all other foreign examinations until May 31, 2020. This decision has left more than 50 million students out of school. This necessary decision is thought to influence equity as private schools/private tutoring opportunities for technology-based learning exist for those families from higher socio-economic background.

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<sup>2</sup> In Punjab, for example, there are an estimated 53,000 private schools versus about 51,000 government schools. Statistics derived from PSLM 2014-15.

**16. The disruption of education services during the COVID-19 pandemic will disproportionately affect disadvantaged and unreached children, including girls and young women.** It is expected that the pandemic will reduce both the demand and supply of education through at least three channels: (i) a negative shock to household income that would make children in those households less likely to attend school; (ii) a negative effect on households' perceptions and attitudes towards sending children to school due to fears of contagion; and (iii) a negative impact to the supply of education via low-fee private schools that may permanently close due to the pandemic episode. The depth and scope of these effects depends upon the length of the COVID-19 pandemic, its potential seasonal characteristics, and education authorities' resolve and the financial and technical capacity to mitigate these effects. Analytical work carried out by the Bank indicates that income shocks and attitudes would reduce girls' school participation more than boys, and that the permanent shock on low-fee private schools would impact the labor prospects of young women who work as teachers in these schools.

**17. The potential economic effects of COVID-19 pandemic will likely reduce available resources for the most disadvantaged districts in the country, exacerbating even further regional disparities in education expenditure and, hence, educational outcomes.** Districts such as Chakwal (Punjab) has an enrolment of 93 percent as compared to districts such as Dera Bugti (Balochistan) with only 13%; and similarly, the literacy rate among urban Punjab males is 72%, while that of rural Balochistan females is only 15%. Children from poor families residing in rural areas have very low enrollment rates; girls are more disadvantaged than boys among these children. Provinces are unable, or unwilling, to specifically target disadvantaged areas as their funds and human resources are focused on addressing the policy, governance and infrastructure demands of education in the province, leaving little room for targeted initiatives for the deprived areas. These trends persist despite a strong positive correlation between education expenditure and learning outcomes by district.<sup>3</sup> A financial squeeze due to the pandemic, is likely to reveal and increase disparities and put students from vulnerable populations and disadvantaged areas of the country more at risk.

**18. The current government education strategies will require adjustments to respond to the pandemic, mitigative measures to reduce the socio-economic impacts on education, and increased preparedness for future emergency events.** The Ministry of Federal Education and Professional Training (MoFEPT) is adjusting their strategy to make more effective provincial and federal coordination, protect gains in access to education and learning (via distance learning), prepare for the return to school, and increase the resilience of the system to shocks. The government also see this as an opportunity to streamline distance education to out-of-school children, incentivize provinces to focus on equity to provide more funding to lagging districts all around the country to increase (or protect) access and student learning.

**19. The immediate response to school closures has been dynamic but lacks coordination.** At the national level, the MoFEPT is broadcasting pedagogical content via TV and awareness campaigns. With support from the Bank's Emergency Project, Pakistan National Television is starting a new channel called "TeleSchool – Taleem Ghar (Education in every house), which will broadcast classes for grades 1 to 12. The government will use donated, existing content from private providers and curate it into lessons based on Student Learning Outcomes. Other mediums such as radio, newspaper, social media and mobile applications are also being considered. At the provincial level, the government of Punjab has launched pedagogical websites with free-of-

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<sup>3</sup> World Bank. 2019. "Rethinking Decentralization" South Asia Economic Focus (October), World Bank, Washington, DC. Doi: 10.1596/978-1-4648-1515-7. License: Creative Commons Attribution CC BY 3.0 IGO

cost content and a TV channel platform for short-term courses through cable operators. All other provinces are considering distance learning but have struggled to implement the approach. The private sector, through NGO and telecommunication companies, has also stepped in and has made on-line content free for the next two months. The private sector has developed a sizeable supply of content for education in grade 1 to 12, as well as the potential to reach a sizeable portion of the 50 million children currently out of school due to the COVID-19 pandemic. Coordination among all these initiatives is practically nonexistent. Contingency plans for emergencies will be necessary for future emergencies and should incorporate an equity angle to ensure that education services are provided to the most vulnerable children.

**20. The proposed Program would focus on Response, Recovery, and Resilience, while disrupting the sector for better coordination and innovative alternatives for out-of-school children.** The proposed Program **Responds** to the current crisis, building on the activities under the education sub-component in Pandemic Response Effectiveness in Pakistan (PREP) Project (P173796) to set up distance learning and create platforms for collaboration with provinces and private sector. The Program would also help with the **Recovery** by supporting activities to get children, teachers, and administrators back to school in a safe way, including initiatives to bring back to school those children that are more likely to dropout from school given the socio-economic effects of the COVID-19 pandemic. The Program will enhance the **Resilience** of the sector by incorporating better planning for emergencies, better coordination, and better alignment between federal and provincial governments. Finally, the Program would **Disrupt** the pre-COVID-19 status quo by setting up a new system of incentives for provinces to invest in the most disadvantaged geographical areas for the country, which would also be the most affected ones by COVID-19 consequences, as well as setting up distance learning as a viable and permanent option for all out-of-school children.

### **C. Relationship to CPS/CPF**

**21. The proposed Program is fully aligned with the World Bank's Pakistan Country Partnership Strategy (CPS) for FY2015–FY2020.** The Program contributes directly to two of the four Strategic Pillars of the CPS. It directly supports Results Areas RA III – Inclusion: Reaching Out to the Underserved, Neglected and Poor, and its sub-outcome 3.2 of reducing vulnerability for groups at risk by increasing girls' gross primary education enrollment; and RA IV – Service Delivery: Accelerating Improvements in Services, and its sub-outcome 4.3 of increased school enrollment and adoption of education quality assessment through increased access for out-of-schools children, innovative education methodologies and improved assessment practices and tracking of learning outcomes. The Program is also broadly aligned with the World Bank's Human Capital Investment approach and directly addresses the global priority of reducing Learning Poverty in Pakistan for equitable opportunities across the country. The Project is aligned with, and informed by, the forward-looking strategy report Pakistan@100 – Shaping the Future, as well as with the First Programmatic Securing Human Investments to Foster Transformation (SHIFT) Development Policy Credit (P170568), the Pandemic Response Effectiveness in Pakistan (PREP) Project (P173796), and the Recovery, Response, and Resilience in Education Project (RRREP; P174223). The Program also frames the Bank's support to education through multiple education and human capital operations in the provinces, such as the Punjab Human Capital Investment Project (P164785), the Khyber Pakhtunkhwa Human Capital Investment Project (P166309), the Sindh Early Learning Enhancement through Classroom Transformation (SELECT, P172834), and the Balochistan Human Capital Investment Project (P166308).

## **D. Rationale for Bank Arrangement and Choice of Financing Instrument**

**22. Rationale for use of a Program for Results.** The PforR instrument would add value as it would support the Government of Pakistan (GoP) to improve the design and implementation of its education reform agenda at the provincial and federal levels, and its short- to medium-term response to COVID-19. Balochistan, Khyber Pakhtunkhwa, Punjab, and Sindh have all produced sectoral plans and strategies. The Federal government has also produced the National Education Policy Framework 2018 and the Pakistan National Education Plan 2020. By focusing on results, innovation, and enhancing coordination among provinces and federal government, the instrument will create the necessary incentive for collaboration, disruption, and results. The Bank, through previous Projects and current Education Projects in all provinces enjoys a comparative advantage in leading education-sector dialogue and play a leadership role in convening other international partners support. Furthermore, by using the experiences and mechanisms of the Public Financial Management and Accountability to Support Service Delivery Project (P157507), the instrument choice will further strengthen partnerships within government, development partners, and other stakeholders. The instrument would also deliver on the commitment of strengthening country systems. By contrast, a traditional investment project, would add to existing coordination challenges, risks of duplication and narrow focus.

## **E. Bank Financed PforR Scope, Objectives, and Key Result Areas**

**23. The PforR program was carved out from the government’s program based on the prioritization of the areas that would deliver the Program Development Objective.** The Program’s design is based on the premise that responding to COVID-19 and getting children safely back to school, while at the same time including distance learning opportunities, reduce the impact of external shocks on the education system. Activities are centered on implementing WASH, communication campaigns, supporting both teachers and students, and preparing and implementing emergency plans, including the curation, editing, and broadcasting of pedagogical content via TV, radio, and on-line will disrupt the system for out-of-school children. Likewise, in the medium term, having better equipped schools in lagging areas of the country and implementing demand-side interventions to nudge education demand would result in increased access to quality education in disadvantaged areas. Finally, strengthened federal and provincial government institutions, policies and coordination could reasonably be expected to increase the management capacity of system to reduce the impact of external shocks and increase/maintain access to quality education and improve equity in the longer term.

**24. The Program Development Objective (PDO) is** To support the government to: (i) respond to school disruptions caused by the COVID-19 pandemic; (ii) recover access and improve education quality; and, (iii) enhance sector resilience through better coordination, with a focus on disadvantaged areas and vulnerable populations.

**25.** Progress toward achieving the PDO will be measured by the following indicators:

- (i) Health and safety protocol awareness increased (by lagging and non-lagging areas)
- (ii) Recover gross enrolment rates in lagging areas/districts (p.p.)
- (iii) Reduction in learning poverty in lagging areas (p.p.)
- (iv) Number of students enrolled/benefiting from multimodal programs in lagging districts/areas (by level of education) – (of which are girls)
- (v) Improved federal-provincial coordination and sector management

26. Result Areas: Following are the three result areas of the proposed program:

***Results Area 1. Response, Recovery and Resilience: Enhanced targeting of COVID-19 education response***

27. This Results Area would enhance targeting of the COVID-19 education response, with a focus on disadvantaged districts. The Program would expand the initial GoP investments for distance learning in lagging areas of each province and support actions to guarantee safety in school reopening. It would also prioritize immediate actions to expand both the demand and supply for education services. In particular for girls and young women. Actions to support girls' re-enrollment will include both communication campaigns, linked with behavioral nudges, that will engage community members, and also structural improvements to schools. The Program would, among other things: (a) adapt and further develop distance learning content to make it relevant and sensitive to disadvantaged groups (e.g. girls, OOSC); (b) adapt and distribute materials to students in lagging districts (digitally, and by phone, printed materials, or otherwise); (c) design and implement strategies to incentivize demand for distance learning and for returning to school, including communications and enrollment campaigns; (d) carry out actions to guarantee the safe return to schools of teachers, students and administrators, including awareness training for teachers, the design and implementation of safety protocols, and the provision of masks, sanitizer, and cleaning products; and, (e) support student and teachers' mental and emotional health. Actions will be adapted to the needs of provinces and lagging areas and will focus on implementable solutions to engage students in learning while keeping schools safe.

***Results Area 2. Improved opportunities for learning for OOSC and at-risk students***

28. This Results Area aims to expand equitable access to education by engaging OOSC through both traditional and flexible multimodal education approaches that will provide them with a pathway towards education certification. These activities will build on existing efforts to establish and expand distance learning programs in response to the COVID-19 pandemic as well as expansion of existing public schools. The Program would focus on incentivizing implementation of multi-modal (distance or face-to-face) learning opportunities for primary- and middle-school-aged children, with a priority for expanding access to OOSC and girls. This will be achieved by supporting lagging areas to expand education services, which are critical for the recovery and return phases, while making them more inclusive and differentiated towards student needs. To achieve this, the this Results Area will focus on, among others: (a) aligning distance learning guidelines with student and teacher national education standards; (b) expanding multimodal and traditional education services; (c) implementing communications and outreach campaigns targeting girls and OOSC; (d) enhancing teacher capacity to assess students and adapt learning content; (e) supporting the design and implementation of accelerated learning programs, including pedagogical material, distance teacher training, information and communications technology, and others; (f) improving existent public infrastructure, including construction of new classrooms or reconfiguration of existing spaces, connectivity, toilets, and enhanced WASH facilities (while using energy-conserving approaches that are environmentally sustainable, wherever possible).

***Results Area 3. Stronger federal-provincial coordination and management***

29. This Results Area would strengthen data systems, research, and planning with the aim of improving sector coordination and management. The actions in this Results Area will better prepare the education system to deal with future disruptions to the sector and improve sector management. The Program will, among other things, support improvements in data systems including those that will establish a broader monitoring and evaluation framework that would

reconcile education data gaps/duplications (particularly those related to indicators measuring girls' progress), streamline reporting against national and international commitments, and support transparent data reporting on student outcomes. The Results Area would also support knowledge sharing and innovative local and global intervention design and evaluations in order to improve policymaking and planning, on distance learning, school management, teacher training and coaching, accelerated learning programs, educational technology, and other pedagogical strategies. The Program also aims to support reforms that digitize government processes for improved planning and management, for example e-audits and education data management systems and will include linkages to larger reforms on public financial management (PFM) in coordination with other World Bank operations. With improved analysis and planning capabilities, and support from local, private sector and development partners, the GoP will be better positioned to respond, recover, and build back a better education system. Results Area 3 will also support the country's capacity to carry out national and international student assessments and the better use of data to improve classroom practice. Finally, the Results Area will also support low-cost interventions to incentivize behavioral change by teacher, students, and parents.

**30. The main mechanism to improve coordination and achieve the outcomes under Results Areas 1 and 2 in this Project would be a federal-to-province performance grant program that would offer financial support and on-demand technical assistance to provinces to focus on the most disadvantage areas in the country.** The MoFEPT would provide equal per-pupil financial and technical assistance to participating provinces who undertake to work with individual rural and remote areas to further program objectives. The technical assistance program would be delivered on demand basis and the MoFEPT would be responsive to specific provincial requests. The overall program goal squarely aligns with the objective of the PforR program. More specifically, the grant program attempts to improve performance of (more) rural poor performing schools in lagging regions, considering indicators such as school enrollment rates, especially those of girls; school dropout rates or retention rates; learning improvements determined proficiency standards and tests; graduation rates; and teacher absenteeism. The allocation basis of funds or resources among areas would be based on school-age population and either the district or the province would distribute these funds or resources to schools in the area. This mechanism would create the needed incentives to focus attention and resources towards the most disadvantaged areas of the country while improving coordination in the federation.

**31. DLIs.** The content, timetable, scalability and amounts of the DLIs would be mainly drawn from the Results Chain. A preliminary proposal of DLIs would be:

**Table 1. Results Areas and Preliminary DLIs and DLRs**

Disbursement Linked Indicators (DLIs)	DLRs eligible for partial achievement <i>(Cumulative Value)</i>
<b>PDO Level Indicators</b>	
DLI 1. Increase of health and safety protocol awareness (by lagging and non-lagging areas)	DLR 1. Adoption of National School Health and Safety Protocols
DLI 2. Number of students enrolled in multimodal programs in lagging	DLR 2. Up to 20,000 students enrolled in multimodal programs in lagging districts/areas

areas/districts (by level of education) – (of which are girls)	
DLI 3. Improvement of federal-provincial coordination and sector management	DLR 3. Approval of the revised National Education Response and Resilience Plan by IPEMC
<b>Results Area 1: Response, Recovery and Resilience: Enhanced targeting of COVID-19 education response</b>	
DLI 4. Enhancement of distance education content	DLR 4.1 Match distance learning content and assessment tools with SLOs, ensure sensitivity to gender and marginalized groups  DLR 4.2. Approval of national distance education strategy
DLI 5. Number of students receiving learning materials in lagging areas/districts	DLR 5. Up to 50,000 students received distance learning kits
DLI 6. Improvement of hygiene in public schools	DLR 6. At least 20,000 public schools received cleaning kits
<b>Results Area 2: Improved opportunities for learning for OOSC and at-risk students</b>	
DLI 7. Number of classrooms for grade 6-8, built and/or rehabilitated in lagging districts – of which classrooms that will serve girls	DLR 7. Up to 2,500 classrooms for grade 6-8 built and/or rehabilitated in lagging districts
DLI 8. Improved WASH facilities in schools attended by girls	DLR 8. Up to 1,000 girls' schools with rehabilitated WASH facilities in schools
DLI 9. Implementation of teacher training programs on distance learning, accelerated programs and formative assessment with a focus on lagging areas/districts	DLR 9.1. Approval and implementation of the design and implementation plan of the distance learning training modules for teachers and coaches  DLR 9.2. Assessment of teacher training program up-take and potential impacts on pedagogical practice
<b>Results Area 3: Stronger federal-provincial coordination and management</b>	
DLI 10. Approval and availability of funds for the grant mechanism under ASPIRE	DLR 10.1. Funds for ASPIRE are approved, allocated, budgeted, and released to provinces

<p>DLI 11. Improvement of the collection of data systems, analysis and transparency</p>	<p>DLR 11.1. Implementation of a functional Provincial and National Open Source Data Platform</p> <p>DLR 11.2. Standardized data is collected, analyzed and publicly released for all provinces in the country</p>
<p>DLI 12. National and international assessment</p>	<p>DLR 12.1. Operationalization of a functional item bank for national assessment and learning poverty comparisons</p> <p>DLR 12.2. Participation in an international assessment that includes competencies in math and language</p>

**32. PforR Program Boundary: The GoP is expediting implementation of key priorities within its National Education Plan 2020 so it can reduce the negative effects of the COVID-19 pandemic on human capital formation.** In its National Education Policy Framework 2018, the Ministry of Federal Education and Professional Training set the national objective of providing for all children “a fair and equal opportunity to receive a high quality of education to achieve their full potential.” The strategy for achieving this objective was elaborated into 6 pillars within the National Education Plan (NEP) 2020-2025 that include: (1) Reduce learning inequities by improving education quality; (2) Improve enrolment rates with a focus on vulnerable populations; (3) Expand adult literacy and vocational training opportunities in lagging districts; (4) Promote national cohesion through education; (5) Research, monitoring, and evaluation for improved local service delivery; and, (6) Improve implementation and technical capacity for research, planning, governance, and finance. Provinces in turn developed Provincial Education Sector Plans that build on these pillars by identifying Province specific challenges and the implementation priorities needed to achieving Provincial and national goals.

**33. The Bank Team is working with the GoP to adjust National Priorities as they currently do not account for the medium and long-term effects the COVID-19 virus will have on the governments’ ability to provide equitable quality education.** Education plans must include strategies that will reconcile national priorities with the effects of the COVID-19 pandemic. This will require mitigating risks to students and the education workforce in the short-term and preserving the education system and education finance in the medium to long-term, while disrupting parts of the system to achieve better educational outcomes. It will also mean safeguarding education support to at-risk student populations such as girls, students with low learning outcomes, or from disadvantaged backgrounds, who may quickly disengage from schooling, thus, further exacerbating the OOSC challenge in Pakistan. The GoP will have to innovate and adapt disruptive high and low-range technological solutions that will preserve current human capital formation while still creating a pathway towards further education that can capture some of the hardest to reach students.

**34. The scope of the PforR Program consists of Results Areas that are aligned with Pillars 1, 2 and 5 within the Government’s Program.** The Results Areas, which were selected as priorities by the Government, build on existing immediate COVID-19 response and recovery strategies, while positively disrupting the sector for better coordination towards equitable access and quality of education. The Program will support implementation efforts nationwide, with a focus on lagging districts (number of OOSC, gender parity, and learning poverty). The carving out of support from the Government Program is a result of prioritization efforts during the COVID-19 pandemic and the expected effects that this support can have on improving equity in access, quality, and education management. The Results Areas are: (1) Response, Recovery, and Resilience: Enhanced targeting of COVID-19 education response; (2) Improved opportunities for learning for OOSC and at-risk students; and (3) Stronger federal-provincial coordination and management. The Government Program and PforR share the same parameters for implementation duration from 2020 to 2025.

**35. Program Expenditure Framework:** The PforR Program will fully support pillars 1, 2 and 5 of the Government Program through a US \$200 million Bank loan which will cover 19 percent of the estimated total Government Program costs (US \$ 1.46 billion).

**F. Program Implementation Arrangements**

**36. The Ministry of Federal Education and Professional Training (MoFEPT) is identified as the implementing agency for the project.** MoFEPT will be assisting provinces for providing funds and monitoring the implementation. Provinces and Federal governments will be selecting districts and schools based on criteria for utilizing the funds. Likely activities for procurement under the Program include digital solutions for e-learning, internships to fill gaps for teachers, teacher salaries, small works (e.g. drinking water and toilet facilities for schools), among others.

**G. Description of Program Activities and Identification of Environmental and Social Effects**

**37.** Consistent with the requirements of the Bank PforR Policy, the proposed Program does not support activities that pose high environmental or social risks. The activities to be supported by the Program are likely to provide environmental and social benefits, and low adverse environmental and social impacts and risks.

**38.** The program activities under each result area is given in the table below:

Result Area	Activities
<b>Result Area-1: Response, Recovery and Resilience: Enhanced targeting of COVID-19 education response</b>	(a) Expanding GoP investment for distance learning to disadvantaged groups (establish distance learning systems) (b) Support actions to guarantee safety in schools reopening (c) Setting up a grant mechanism to incentivize provincial governments to: (i) design and adapt distance learning materials and content; (ii) adapt and distribute materials to students (digitally, phone, physically, or otherwise); (iii) Communication campaigns to support girls’ re-enrollment (iv) Awareness training for teachers on health and safety (v) Design and implementation of safety protocols (vi) Provision of masks, sanitizer, and cleaning products

	(vii) Support student and teachers' mental and emotional health
<b>Result Area 2: Improved opportunities for learning for OOSC and at-risk students</b>	<ul style="list-style-type: none"> <li>(a) Incentivize implementation of multi-modal (distance or face-to-face) learning, expanding access to OOSC and girls</li> <li>(b) Supporting lagging areas to expand education services</li> <li>(c) Aligning distance learning guidelines with student and teacher national education standards</li> <li>(d) Expanding multi-modal and traditional education services</li> <li>(e) Implementing communications and outreach campaigns targeting girls and OOSC</li> <li>(f) Enhancing teachers' capacity to assess students and adapt learning content</li> <li>(g) Supporting the design and implementation of accelerated learning programs (pedagogical material, distance teacher training, information and communications technology etc.)</li> <li>(h) Construction of new classrooms or reconfiguration of existing spaces, connectivity, toilets, and enhanced WASH facilities</li> </ul>
<b>Result Area 3: Stronger federal-provincial coordination and management</b>	<ul style="list-style-type: none"> <li>(a) Establish monitoring and evaluation framework to reconcile education data gaps/duplications</li> <li>(b) Support knowledge sharing, innovative local and global intervention design and evaluations in order to improve policymaking and planning</li> <li>(c) Support reforms that digitize government processes for improved planning and management (for example e-audits and education data management systems)</li> <li>(d) Support the country's capacity to carry out national and international student assessments and the better use of data to improve classroom practice</li> <li>(e) Support low-cost interventions to incentivize behavioral change by teacher, students, and parents</li> </ul>

**Result Area-1: Response, Recovery and Resilience: Enhanced and targeted COVID-19 education response**

**Environmental Effects**

39. Most of the activities under Result Area-1 are related with the design of the distance learning system, design and distribution of the learning material, communication and outreach campaigns and support activities for teachers, students and government. These activities will not result any environmental risk or benefit.

**Social Effects**

40. Most of the activities under Result Area-1 will provide social benefits to the student community of the country, particularly the community of disadvantaged areas.

(1) **Benefits**

41. The program will setup distance learning to reach out to the 50 million COVID-19 effected, 22.8 million OOSC and other at-risk students of the country, with emphasize on the disadvantaged areas of different provinces. Effective design and implementation of distance learning will help in

returning the affected students, reduce the OOSC and at-risk students, enhance enrollment rate at schools, and significantly reduce the learning poverty of the country.

**42.** Implementation of effective communication and outreach campaign in lagging areas, with special focus on girls and young women of the community will increase the education demand. This campaign should address all the concerns related with distance learning including material, method, mentoring, support, supervision, incentives, assessment, examination etc. to facilitate students and parents, build their confidence to adapt to this new education technique and remove all the ambiguities of distance education system.

**43.** Program activities will educate/support students to take nutritional diet to improve their mental health. Nutritional food strongly influences positive mental health outcomes in children and teens. Studies show that unbalanced diet is correlated with unfavorable mental health and behavioral outcomes among children and teens. For example, such diet is associated with apathy, lack of motivation, and lower levels of engagement in the classroom. Children struggling with proper food are more likely to experience anxiety and irritability, and teens face a higher risk of developing depression, bipolar disorder, and suicidal tendencies.

## (2) **Risks**

**44.** Development and implementation of effective distance education system in the lagging areas will be a challenging task. The design of these system should be appropriate to the socio-cultural norms and needs of the lagging areas. It is essential that such an initiative should be supported by proper human (teachers/mentors) and financial resources. Effective communication and outreach campaign will be key in creating demand of education in the deprived communities. Such campaigns will help in building confidence among parents to get financial, social and mentoring support for their children from the Program. This trust building will mobilize communities to enroll their children in the schools or at distance education system. In the absence of these factors the envisioned outcome of the program for equitable access and quality of education to the children might be compromised. Mostly the distance learning, communication and outreach material will be produced in Urdu language, but other languages will also be considered as per the need of the target areas.

## **Result Area-2: Improved opportunities for learning for OOSC and at-risk students**

### **Environmental Effects – WASH Facilities**

**45.** Activities under Result Area-2 can cause environmental risks related to WASH activities. Improvement in WASH (Water, Sanitation and Hygiene) infrastructure at schools will pose environmental risks if these facilities are not properly constructed and managed. The WASH infrastructure includes toilets and sewerage, drinking water and hygiene facilities (washbasins). The potential environmental and health risks are associated with WASH facilities if there is shortage of water supply at toilets and washbasins, inappropriate treatment and disposal of sewage from the toilets, non-potable drinking water facilities and the limited supply of hygienic products (soaps, germicidal/disinfectants) and substandard hygienic services (washing, cleaning and disposal of waste) at schools.

## (1) Risks

**46. Water Supply:** Pakistan is already one of the most water-stressed countries in the world, a situation which is going to degrade into outright water scarcity due to high population growth<sup>4</sup>. Pakistan is heading towards a situation of water shortage and by corollary, a threat of food insecurity. Per capita surface water availability has declined from 5,260 m<sup>3</sup> per year in 1951 to around 1,000 m<sup>3</sup> in 2016. This quantity is likely to further drop to about 860 m<sup>3</sup> by 2025 marking Pakistan's transition from a "water stressed" to a "water scarce" country<sup>5</sup>. Safe water and availability of required level of water for WASH at schools, particularly in the rural areas of Sindh and Balochistan provinces, will be a challenge for the schools. The WASH outcome would not be achieved under shortage of water supply conditions.

**47. Treatment and Disposal of Sewage:** School toilets will generate sewage. This sewage will be the source of pathogens. It will be a potential health risk for the school children, staff and the community, if this sewage is not properly treated and disposed of through sewers or closed drains at appropriate disposal site and dumped openly without any treatment. The open disposal of sewage will result into breeding of mosquitoes and flies, the source of outbreak of diseases in the community. This sewage can also contaminate water resources and the source of water borne diseases such as diarrhea, typhoid, cholera, dysentery, and hepatitis.

**48. Drinking Water Quality:** In Pakistan, water in most of the areas, is contaminated with microbiological and chemical contaminants. Microbial pollution has been discovered as one of the serious problems in rural as well as urban areas. This is due to the leakage of pipe, pollution from sewage lines intrusion into drinking water supplies, and so forth. Chemical contaminants come from industries, soil sediments, and runoff from agriculture, that is, pesticides and fertilizers, and enter into water resources. Another important problem with groundwater is high concentration of salts, which is mainly due to irrigation, soil salts dissolution, sea water encroachment, and chemical industries. Salinity impacts the major areas of Balochistan, KPK, and Punjab. Effluent from industries and domestic sources contains high concentration of arsenic that is becoming a problem. In major cities of Sindh and Punjab, about sixteen percent of people are exposed to more than 50 ppm of arsenic. Higher concentration of fluoride above permissible limits causes a trouble in major areas of Balochistan, Punjab, and Sindh. The dental fluorosis diseases are commonly found in Sindh, Punjab, and KPK<sup>6</sup>.

**49.** Safe water supply is a challenge for most of the schools in Pakistan in general, and particularly schools located in the underground brackish water zones in southern Punjab, Sindh and Balochistan. Students and teachers are facing health risks due to contaminated water supplies in schools. It is mandatory under the environmental protection acts (federal and provincial) for the municipalities and Water and Sanitation Authorities (WASAs) to supply safe drinking water to the consumers. There are no mandatory requirements for school's administration to ensure safe drinking water quality at schools.

**50. Hygiene Products/Services:** Provision of hygiene products such as soaps and germicidal/disinfectants, and hygiene services i.e. washing and cleaning of toilets, floors and furniture and proper handling and disposal of solid waste will be important for the upkeep of school hygiene condition. In case if these services and product supplies are compromised at schools,

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<sup>4</sup> World Bank, Pakistan's Economy Running Dry

<sup>5</sup> National Water Policy, April 2018

<sup>6</sup> M.K. Daud, et.al., Review Article 'Drinking Water Quality Status and Contamination in Pakistan'

the consequential unhygienic condition will affect children health and increase their absenteeism from schools.

### **WASH Situation at Public Schools**

**51.** This section has been developed based on the information presented in UNICEF publication, "Water, Sanitation & Hygiene (WASH) in Public Sector Schools Strategic Plan for Sindh 2017-2022",<sup>7</sup> and Pakistan Education Statistics 2015-16.<sup>8</sup>

#### Overall

**52.** Many UNICEF and WHO studies establish that school children enrollment, absenteeism, and dropouts can be attributed to lack of proper water, sanitation and hygiene (WASH) facilities in schools. The WHO publication states that improved WASH services and facilities will result in reducing diseases burden and equitable access to education (*Water, Sanitation and Hygiene Standards for Schools in Low - cost Settings, WHO, 2009*).

**53.** Statistics provided by the Ministry of Education & Professional Training (MoFEPT) states that about 74% of girls and 48% boys in primary schools have adequate toilets, and 81% of girls and 75 % of boys at primary schools have access to drinking water. It is estimated that every day, about 670,000 children miss school mostly due to water-borne illnesses.

**54.** WASH facilities in most of the schools are not built as per design standards (25:1 for girls and 40:1 for boys). Operations and Maintenance (O&M) of WASH facilities are not satisfactory, especially in the public schools. This happens due to the reasons that low priority is given to O&M while planning, budgeting and implementation, and school monitoring/inspection. Solid waste collection and disposal services in urban and rural schools are marginal. Excreta in most of the cases in rural areas is disposed in unsafe manners.

### **Status of WASH in Schools in the Provinces**

#### **Sindh**

**55.** In Sindh, 54% schools are reported to have toilet facilities. The sanitation situation in middle schools is comparatively better in Sindh, about 70% have toilets. In Sindh 53% girls' and 50% boys' primary schools have washroom/toilets facilities. About 71% girls' middle schools and 100% high schools have the toilets. In case of boys, 70% middle schools and 98% high schools have the toilets.

**56.** In Sindh rural areas, 49% primary, about 66% middle, and about 98% high schools have the toilets. In urban areas, 75% primary, 87% middle, and 100% high schools have the toilets.

**57.** In case of drinking water facilities, in total 47% primary, 60% middle and 94% high schools have drinking water supplies. In the case of boys' schools, 47% primary, 60% middle, and 93% high schools have the drinking water facilities. In case of girls' schools 46% primary, 61% middle, and 96% high schools have the drinking water facilities.

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<sup>7</sup> UNICEF, Water, Sanitation & Hygiene (WASH) in Public Sector Schools Strategic Plan for Sindh 2017-2022

<sup>8</sup> Pakistan Education Statistics 2015-16

**58.** In case of rural areas, 45% primary, 55% middle, and 93% high schools have the drinking water facilities.

## **Balochistan**

**59.** In Balochistan, in total 13% primary schools are reported to have toilet facilities. The sanitation situation in middle schools is comparatively better in Balochistan, 50% do have toilets. In case of high school in public sector 69% have washroom/toilets facilities.

**60.** It is alarming to note that in Balochistan, 66% girls' primary schools do not have washroom/toilets facilities. In the case of boys' primary schools 84% of primary schools do not have washrooms/toilets. 36% girls' middle and 22% girls' high schools do not have toilets. 59% boys' middle and 34% boys' high schools do not have toilets.

**61.** In the case of rural areas, only 12% primary schools have toilets. 48% of rural middle schools have the toilet facility. The situation improves further in the case of high schools in rural areas, 66% have the toilets. In urban areas, 18% primary, 55% middle, and 74% high schools have the toilets.

**62.** Overall, 52% primary, 55% middle, and 72% high schools have drinking water facility. In rural areas about 53% primary, 53% middle, and 70% high schools have the drinking water facility. In urban areas, about 47% primary, 38% middle, and 25% high schools lack in the drinking water facility.

**63.** In boys' schools, 52% primary, 51% middle, and 70% have the drinking water facility. In girls' schools, 53% primary, 59% middle, and 75% high schools have the drinking water facility.

## **KPK**

**64.** In KPK, 87% schools are reported to have toilet facilities. The sanitation situation in high schools is comparatively better in KPK, about 96% have toilets. In KPK 95% girls' and 80% boys' primary schools have washroom/toilets facilities. About 96% girls' middle schools and 99% high schools have the toilets. In case of boys, 86% middle schools and 95% high schools have the toilets.

**65.** In KPK rural areas, 85% primary, about 90% middle, and about 96% high schools have the toilets. In urban areas, 96% primary, 94% middle, and 100% high schools have the toilets.

**66.** In case of drinking water facilities, in total 72% primary, 75% middle and 88% high schools have drinking water supplies. In the case of boys' schools, 66% primary, 73% middle, and 87% high schools have the drinking water facilities. In case of girls' schools, 81% primary, 78% middle, and 91% high schools have the drinking water facilities.

**67.** In case of rural areas, 71% primary, 74% middle, and 87% high schools have the drinking water facilities.

## **Punjab**

**68.** In Punjab, 99% schools are reported to have toilet facilities. The sanitation situation in all categories of schools is particularly good in Punjab, about 99% have toilets. In Punjab 100% girls' and 99% boys' primary schools have washroom/toilets facilities. About 100% of the girls' middle

schools and high schools have the toilets. Same is the situation for the boys' middle and high schools.

**69.** In Punjab's rural and urban areas, about 99 to 100% of the primary, middle, and high schools have the toilets.

**70.** In case of drinking water facilities, about 100% of the primary, middle and high schools have drinking water supplies. It means that drinking water supply is available in all categories of girls and boys schools of urban and rural areas.

## (2) **Benefits**

**71.** The provision of safe environment, drinking water supply, sanitation and improvised/renovated classroom for students in the disadvantaged schools will likely lead to better health outcomes for students and increase opportunities to learn. WASH interventions will contribute to improve the school environment and make the schools more conducive for the students to achieve quality of education.

**72.** School students spend most of their times in schools and school environment significantly determines student's health and happiness. Schools are the places where students get infected frequently. Even disease spread faster, because many students gather together for many hours a day in space with limited WASH facilities. Infectious diseases due to unsafe water, inadequate sanitation, improper or lack of hygiene practices, ill functioning hand washing facilities without soap etc. are the key factors of lower school attendance which finally increase the dropout. WASH program in school can have a multitude of benefits including decrease of dropout, increase academic performance, and learning of hygiene practices. Schools influence children behavior and childhood is the best time for children to learn hygiene behavior. Hygiene behavior together with improved facilities brings improvement in health condition.

## **Social Effects**

**73.** The activities supporting this result area are expected to produce social benefits and pose social risks, as described below.

### (1) **Benefits**

**74.** Children have a right to basic facilities such as school toilets, safe drinking water, clean surroundings and information on hygiene. If these conditions are created, children come to school, enjoy learning and learn better. In this way, investment in education is more productive. Such conditions have an even greater positive outcome for girls who often stay away from or dropout of schools, which do not have menstrual hygiene management facilities.

### (2) **Risks**

**75.** Provision and maintenance of WASH facilities at schools contribute in increasing enrollment and reduce absenteeism and dropouts from schools. The WHO publication (*Water, Sanitation and Hygiene Standards for Schools in Low - cost Settings, WHO, 2009*) states that improved WASH services and facilities will result in reducing diseases burden and equitable access to education. Lack of WASH facilities and their compromised O&M at schools can demoralize the children to attend the school and increase absenteeism due to diseases. More affected would be the girls. The menstrual hygiene management is one of the key areas at

secondary level education and is believed to be one of the key reasons for increased girls drop out at primary level. Under COVID-19 pandemic episode, if school operations are continued without following SOPs, there are utmost chances of corona virus epidemic among students, school staff and the community.

## **Environmental Effects – School Rehabilitation and Construction**

**76.** Activities planned under investing in school facilities (infrastructure and WASH) will include physical interventions such as construction, rehabilitation and renovation work as the schools will expand their existing facilities (e.g. increase of classrooms, construction of WASH facilities). These construction activities might cause low short-term environmental risks. The environmental issues related with the provision of WASH facilities and their operations are already discussed.

### **(1) Risks**

**77.** Construction/rehabilitation works will be carried out within the school premises. Land acquisition will not be required, and it is not part of the Program. Any loss or conversion of natural habitats and any changes in land or resource use are not expected. Low level short-term environmental impacts may occur in the form of drainage clogging/wastewater ponding, air pollution due to dust and stack emissions, noise pollution, soil pollution, occupational health hazards due to improper management of sanitary and hazardous waste (including the asbestos from the existing facilities while rehabilitation work). Construction activities will cause temporary disruption of school activities. There will be also low level of risk to public and worker health and safety at construction sites.

### **(2) Benefits**

**78.** The benefits of WASH facilities are mentioned previously. The construction of new classrooms will allow schools to enroll and accommodate more students and provide better ambience for quality education.

## **Social Effects**

**79.** The activities supporting this result area are expected to produce social benefits and pose social risks, as described below.

### **(1) Benefits**

**80.** Most of the social benefits of Result Area-2 are similar to Result Area-1. These have been already discussed above. Program activities will lead to skill and mental development of the students of the disadvantaged areas. Financial support will be provided to the poor students to negate poverty element for education access. Teachers' capacity will be enhanced to cater for the emerging needs of distance education in the country.

### **(2) Risks**

**81.** Most of the social risks associated with the WASH facilities and communication and outreach campaigns are already discussed. There are chances of encroachers at schools premises (shops, peddlers/hawkers, huts etc.) which need to be removed prior to construction of new classrooms in the schools. This aspect can lead to dispute among school administration and

the encroachers. The involvement of construction workers at school premises during school operation can lead to high risk environment for Sexual Exploitation, Abuse and Harassment (SEAH) for children, young girls and female teachers. SEAH can also be among workers where females and children are involved in the construction activities. Under COVID-19 pandemic episode, if construction work is continued without following SOPs, there are utmost chances of corona virus epidemic among workers, students, school staff and the community.

**82.** There are many socioeconomic factors contributing high dropout rate, at risk and OOSC in general and particularly at disadvantaged areas of the country. If these social factors are not given due consideration in developing and implementing distance or other education mechanism and communication and outreach campaign to mobilize students and community, there can be potential risks that the dropout rates will not be reduced and the OOSC could not be mobilized.

**83.** These factors include:

(i) High poverty, deprivation due to lack of food, illness, lack of choices, unemployment, wage work by children, vulnerability, unpaid family labor, sibling responsibility, cattle grazing, high cost of education.

ii) Shortage of teachers, non-availability of required number of teachers at primary level, hesitation of female teachers to work in rural areas and teachers' absenteeism. Shortage of teachers, especially, in primary schools, single teacher or two teachers policy in the provinces, posting of teachers far from their homes. Teachers especially female teachers hesitate to go to schools located in remote areas, inadequate and improper residential facilities for teachers especially in far flung areas, low morale of primary school teachers and their harsh treatment towards pupils; sub-standard student-teacher ratio; inadequate knowledge of the child psychology; and low qualified and un-experienced teachers.

iii) Poor motivational level of parents, illiteracy of parents, large family size, parents non-willingness to send their children to school due to poor condition of schools, low quality of education, conservative attitude of parents, migration of parents, early marriage of girls and engaging children in labor market.

iv) Poor health of child will lead to repetition or eventually drop-out from school. Even if a child attends school regularly, the child may not be able to give sufficient attention to the classroom situation because of physical or mental fatigue due to hunger or undernourishment.

v) Parents do not perceive the education being imparted in formal schools as beneficial in getting jobs or imparting skills to their children. Institutions failing to provide students necessary skills along with education play a great role in leading many children to be out of school.

vi) Parents in rural areas have low motivation levels regarding education of their children and lack of interaction between teachers and parents further cuts them off from their child's education. This lack of parental interaction creates an atmosphere of distrust and uncertainty about child's education.

vii) Formal schooling has fixed and lengthy timings, which prove to be another obstacle that children and their families need to overcome in order to be regular for schools. Children in rural areas play a very important role during harvest season when every hand matters. Formal school

system does not allow enough flexibility to cater towards such contextual issues as they follow the same timetables and vacation schedules as those in urban areas.<sup>9,10</sup>

### **Result Area-3: Stronger federal-provincial coordination and management**

**84.** Most of the activities under Result Area-3 will not pose environmental risk. Most of these are the support activities for preparing strategies, providing funds to provincial governments, establish coordination for data collection, and facilitate government and private sector cooperation. These activities don't involve any such physical intervention that can pose environmental risks. The activities of digitizing government processes will be ICT based. These would require the procurement of several types of IT equipment items and devices (smart phones, desktop computers, laptops, printers, servers, scanners, wireless networking technologies etc.) for use by the different educational departments of the program. By virtue of ICT equipment use, electronic waste (e-waste) is expected to be generated at the start of the program (replacing redundant ICT equipment) and by the end of life service of the procured equipment. The environmental and health and safety impacts occur during the recycling and disposal of the e-waste. If e-waste is recycled and disposed under improper extraction facilities (for example for copper and gold etc.) and disposal arrangements then the environment and the health and safety impacts will occur in the form of discharge of heavy metals in the environment and risks to the health of the associated workers and communities. Mostly these activities will not pose any social risk. Social benefits for providing equitable access and quality of education to the children through effective policies and strategies and financially supporting the vulnerable community for education uplift have already been discussed under Result Area 1 and 2.

**85.** The system digitalization through ICT use and transformation to e-offices in education departments can pose risk on those office employees which have low level of IT literacy and knowledge. These employees can be marginalized. However, this risk can be turned into opportunity by providing training to these employees and upscaling their ICT knowledge through TA component so that they could remain in the mainstream.

### **Grievances Redress and Citizen Engagement**

**86.** It is always beneficial to have a dialogue with the beneficiaries and affected people. People can have concerns regarding environmental and social aspects. Regarding environmental and social aspects, citizens can play a proactive role in reporting unsatisfactory WASH facilities and the pollution arising from sewage and solid waste of the public schools. Citizens can also play an important role to get social benefits from the program activities, by registering their grievances. However, citizen engagements and stakeholder feedbacks on program design, performance and impacts are a relatively new concept in government departments and needs further strengthening. In this regard, registering grievances and getting response on the same has high social values. Failing to do so is a cause of concern for the public at large.

**87.** Currently, the capacity of the implementing departments to respond to grievances is limited. In case of provincial EPAs, Planning & Coordination (P&C) Units are responsible to record and respond to public complaints and serves as the Grievance Redress Mechanism (GRM) for

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<sup>9</sup> Dawood Haider, et al., Causes of Dropout Rates at Primary Level in Pakistan, International Journal of Curriculum and Instruction, 2019

<sup>10</sup> Rimsha Kamran, et al., Out of School Children: Causes Behind Primary Dropout, Journal of Inclusive Education, 2017

environment related complaints. Complaints are mainly received in the form of applications and are recorded manually in a register with a file number.

**88.** It is worth mentioning that most federal and provincial government departments maintain websites and have complaints' registers at each site as Feedback or Complaint menu. The effectiveness of complaint registry and responses varies. For example, in Punjab, there is an Online Complaint Cell maintained by the Chief Minister's Office in Punjab, which registers complaints against all government departments. The Chief Minister, Punjab complaint cell is operated through PITB call center. There is no language barrier at this complaint cell. The complainant can register its complaint in Urdu as well as in English language.

**89.** PITB in Punjab is also operating call center to receive complaints from the Punjab Government departments. The employees can lodge complains against their superiors at this portal. However, the departmental complaint register is limited to certain departments only such as health, education etc.

**90.** Complaint cells have been established at provincial websites of other provinces to register complaints and grievances for the Chief Minister of the respective province. There is no complaint registers at the websites of the educational departments of Sindh, Balochistan and KPK and the Ministry.

**91.** The citizens are not aware of the system and do not frequently use the system. The officials often lack the capacity to address grievances. There is a need to strengthen the capacity of officials and raise awareness of citizens. At the school level, different platforms such as school administration, school managing committees, parents-teachers association etc. are particularly good channels to raise and mitigate grievances. School Management Committees (SMCs) are the overall governing body of school systems which are formulated with the aim to involve parents and communities in school management. These SMCs can be effective part of the program GRM.

**92.** It is assessed that existing Grievance Redress Mechanism has spread in the system of Provincial Governments and departments. There is a need to consolidate the GRM system for Program at the Federal Ministry and provincial education departments' level.

**93.** Absence of effective grievance redress mechanisms often result in social risks of conflicts, suspicions and displeasure at the local level by the Program affected people. This will prevent the government from understanding Program performance and grievance of the general public.

**94.** Recognizing these, the program will proactively promote citizen engagement in the program implementation, through access to program information, public consultation and public reporting. Such citizen engagement will help rebuild the implementing departments' creditability and diffuse doubts and skepticism against the Program outcomes.

**95. World Bank Grievance Redress Service:** World Bank has also established Grievance Redress Service where the communities and the individuals who believe that they are adversely affected by a World Bank supported Programs may submit complaints to the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

### **III. ASSESSMENT OF ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS AND IMPLEMENTATION CAPACITY**

#### **A. Introduction**

**96.** Program for Results policy requires the proposed Program to operate within an adequate environmental and social management system that can manage environmental and social effects (particularly adverse impacts and risks) identified during the ESSA process. This includes (a) an adequate legal and regulatory framework and institutional setting to guide environmental and social impact assessment and the management of environmental and social effects, and (b) adequate institutional capacity to effectively implement the requirements of the system.

**97.** This section assesses whether the Program’s environmental and social management systems are consistent with the core principles and key planning elements contained in the PforR and whether the involved institutions have the requisite capacity to implement these systems’ requirements. Both elements (e.g. program systems and capacity) are necessary towards ensuring that the environmental and social effects identified in Section II are effectively managed. Through both analyses, the ESSA team has identified gaps in both areas, which are addressed in Section V: Inputs to the Program Action Plan.

**98.** A Program system is constituted by the rules and “arrangements within a program for managing environmental and social effects,” including “institutional, organizational, and procedural considerations that are relevant to environmental and social management” and that provide “authority” to those institutions involved in the Program “to achieve environmental and social objectives against the range of environmental and social impacts that may be associated with the Program.” This includes existing laws, policies, rules, regulations, procedures, implementing guidelines, etc. that are applicable to the program or the management of its environmental and social effects. It also includes inter-agency coordination arrangements if there are shared implementation responsibilities in practice.

**99.** Program capacity is the “organizational capacity” the institutions authorized to undertake environmental and social management actions to achieve effectively “environmental and social objectives against the range of environmental and social impacts that may be associated with the Program.” This ESSA has examined the adequacy of such capacity by considering, among other things, the following factors:

**100.** Adequacy of human resources (including in terms of training and experience), budget, and other implementation resources allocated to the institutions;

- (a) The adequacy of institutional organization and the division of labor among institutions;
- (b) Effectiveness of interagency coordination arrangements where multiple agencies or jurisdictions are involved; and
- (c) The degree to which the institutions can demonstrate prior experience in effectively managing environmental and social effects in the context in projects or programs of similar type and magnitude.

**101.** This ESSA examines and discusses only those aspects of the proposed Program’s environmental and social management systems and related capacity that the ESSA Team found to be relevant considering its identified environmental and social effects. This section provides a summary assessment of the program’s systems and capacity as these relate to each of the core

principles and key planning elements. The text and tables below clarify the instances in which one or more of the Core Principles or Key Planning Elements are not relevant to the program and are thus inapplicable. More in depth discussion and analysis of the Program's systems and capacity are found in Annex 4.

## **B. Core Principle 1 – Environmental and Social Management**

**102.** The assessment of Program systems under this principle determines that there are likely environmental risks associated with the WASH facilities, disposal of sewage and solid waste from schools and construction of new classrooms. WASH facilities include toilets, washbasins, water supply for sanitation, drinking water supply, and hygiene product and services. Lack of WASH facilities, supply of sanitation water, drinking water and hygiene products and services can pose health implications in school children. Improper treatment and disposal of sewage and solid waste from schools can result into environmental and health problems for children, staff and nearby communities. The construction of new classrooms can pose environmental risks in terms of air, water, soil and noise pollution and safety concerns for the workers. The government operations' digitization will generate e-waste whose improper handling and disposal can cause environmental risks due to its hazardous nature.

**103.** Social risks may include conflict arising due to removal of encroachment from the school premises for the construction of new classrooms, social divide and distress among employees if those of limited ICT knowledge are not involved in the main stream by enhancing their ICT capabilities, SEAH risks for children, young girls and female teachers and among female and child workers during construction activities.

### **Overall WASH**

**104.** The Education Policy (2009) puts special emphasis on the need to address school WASH, identifying the provision of missing facilities, and in particular toilets and drinking water facilities, as critical for retention and quality education. This policy also underlines the need for safe menstrual hygiene management education and counselling, availability of sufficient clean water and soap for personal hygiene, functioning toilets, private washrooms and low cost sanitary materials for girls (*WaterAid Pakistan 2015*).

**105.** Punjab WASH in Schools (WinS) Strategy provides guidelines for teachers and student and establishing schools management and councils to promote WASH in schools. It focuses on improved water supply system, sanitation facilities for schools (separate latrines for students and staff, and for girls and boys, maintenance of minimum standard of 40 students per latrines, reasonable number of washbasins), wastewater disposal and solid waste management, establishing WASH clubs at schools, provision of Menstrual Hygiene Management (MHM) in the WASH infrastructure for adolescent girls (provision of 30 girls per latrine, separate latrine for boys and girls, privacy and security of the latrine users).

**106.** Sindh Education Sector Plan (2014-18) emphasizes a minimum package of facilities for schools. It recommends that the educational infrastructure that will have the most impact will vary from school to school and will include the provision of facilities such as classrooms, outdoor learning and play areas, furniture, water and sanitation, administration buildings and storage facilities. Water and sanitation facilities, boundary walls and furniture certainly need to be included on the priority list; basic spaces and outdoor play equipment can be provided at relatively low cost. The design criteria is provided for latrine as 25:1 for girls and 40:1 for boys, water

requirement as 45-100 liter per head for domestic use and 4-6 liter per head for separate drinking water system.

**107.** KPK Schools Sector Plan (2015-20) under policy group of Better Schools and Facilities ensures that all government schools in the province have the basic facilities of a boundary wall, running water, lavatories, and electricity in place and functioning.

## **Water**

**108.** One of the policy measures under National Environmental Policy (2005) focuses on to provide sustainable access to safe water supply and effectively manage and conserve the country's water resources. The National Climate Change Policy recommends action regarding prepare and enforce legislation for water resource management in industry and domestic sectors with special focus on groundwater, conduct awareness campaigns to underscore the importance of conservation and sustainable use of water resources. Under Pakistan Climate Change Act (2012), Climate Change Authority approves guidelines for the protection and conservation of renewable and non- renewable resources.

**109.** National Water Policy (2018) provides a national framework within which the provinces can develop their master plans for sustainable development and management of water resources. Sindh Strategy for Sustainable Development (2007) mainly focuses on to promote the sustainable use of natural resources and recommends that the rehabilitation and extension of water supply and sanitation networks, effective water and wastewater quality monitoring and treatment to comply with Sindh Environmental Quality Standards (SEQS). Specific objective of the Sindh Drinking Water Policy also includes institutionalize Water, Sanitation & Hygiene (WASH) in school.

**110.** The Punjab Water Act (2019) addresses the water and sewerage services in the province. For water services, Punjab Water Services Regulatory Authority will be established to enforce the provisions of the act in the province. Major focus of this act is to i) appoint a company, a local government or a statutory authority to be the water undertaker or sewerage undertaker for any area and perform assigned duties, ii) regulations for preserving water quality, iii) provide permission to abstract water directly, iv) prevention of contamination, misuse and wastage of water, v) designating controlled water (rivers, natural reservoirs, etc.) and offences related with destroying these waters, vi) declaring water protection zones.

## **Drinking Water**

**111.** The National Drinking Water Policy (2009) stresses that a lack of adequate drinking water facilities in schools is one of the contributing factors to both low enrolment and high drop-out rates. The vision of the Sindh Drinking Water Policy (2017) is to provide safely managed drinking water whose supply is adequate, well maintained and sustainable and to enhance public awareness about health, nutrition, and hygiene related to safe drinking water. The overall goal of the policy is to improve the quality of life of people of Sindh by reducing morbidity and mortality caused by water borne diseases through provision of safely managed and potable drinking water to the entire population that is located on premises, available when needed, and free from contamination, affordable and of sufficient quantity, and in a way that is efficient, equitable and sustainable.

**112.** Under Provincial Local Government Acts, the provision and maintenance of water supply schemes and public sources of drinking water are the responsibilities of municipal

corporations/committees. The Khyber Pakhtunkhwa Drinking Water Policy (2015) envisions a better quality of life for the people of KPK through universal access to adequate quantities of potable water. Specific objectives of the policy are to enhance the drinking water supply coverage in the province, introduce reforms in the drinking water supply sector, ensure protection and conservation of water resources, promote cost effective and appropriate technological options for water supply systems, increase public awareness about water protection and conservation, safe hygiene practices and the nexus between sanitation and safe water supply services.

**113.** There are different authorities responsible for the supply of adequate quantity and quality of water to the citizen of Pakistan in all the four provinces. In Punjab, the 'Water and Sanitation Agencies (WASAs)' supply water in large cities whereas the Municipal Corporations/Committees (MCs) supply water in small cities and towns. In Sindh, 'Karachi Water and Sewerage Board (KWSB)' supplies water to the Karachi city whereas the WASAs and MCs to other cities and towns of the Sindh. In KPK, MCs supply water in all the districts of the province. In Balochistan, WASA supplies water to the Quetta city and MCs to the other districts of the province. Under Punjab Water Act 2019, the company called water undertaker will be established to ensure the adequate supply and quality of water to the people. However, this act is yet to be enforced.

**114.** There are national and provincial drinking water quality standards in Pakistan. The water supply authorities have the mandate to ensure water quality as per the prescribed standards. Pakistan Council of Research in Water Resources (PCRWR) is the focal agency for water quality monitoring in Pakistan. The water supply authorities do not have resources and capacity to monitor and maintain required water quality.

**115.** It is clear from the school WASH data presented in the previous section that the performance of Punjab province is particularly good for the complete coverage of the public schools in the province to supply drinking water. Punjab WASAs and MCs are effective in water supply coverage in the province. After Punjab, the performance of KPK is also good. The MCs of KPK cover about 70 to 90% of the public schools to supply drinking water. Sindh is performing at the third level in the coverage of schools. The coverage of high, primary and middle schools for drinking water supply is 94%, 47% and 60%, respectively. Balochistan is in the bottom tier of the water supply coverage. It is quite strange that the water supply coverage in rural schools is better than the urban schools meaning that the MCs are performing better than WASA in Balochistan.

## **Sanitation**

**116.** The National Sanitation Policy (2006) seeks, amongst other objectives, to promote community-led total sanitation and facilitate access for all citizens to basic level services in sanitation, including the installation of sanitary latrines in each household, in rural and urban areas, schools, bus stations and important public places, and also community latrines in densely populated areas. The Pakistan Approach to Total Sanitation is the Government's tool to implement the National Sanitation Action Plan 2010-2015. It includes school-led total sanitation as one of its key components, tapping into the potential of children as agents of change to help shift perceptions at community level.

**117.** The performance pattern of provinces for schools' sanitation coverage is quite like the drinking water supply coverage. It is clear from the school WASH statistics that Punjab takes the lead in providing toilets to nearly all the public schools of the province. KPK is at the second level of performance after Punjab. About 90% of the public schools in the province have latrines. Sindh is at the third level of performance in sanitation coverage. Overall half of the schools have latrines. Performance in high schools is very good for nearly to 100% coverage. Balochistan is at the

bottom level of performance with poor sanitation coverage in the province. Only 13% of the primary schools, half of the middle schools of rural and urban areas and 44% of the girls' primary schools have latrine in the province.

## **Disposal of Sewage and Solid Waste**

**118.** Under national and provincial environmental protection acts, the wastewater and the solid waste discharge is controlled. Under these acts, no person is allowed to discharge or emit any effluent or waste or air pollutant or noise in an amount, concentration or level which is in excess of the specified Environmental Quality Standards (EQS). These EQS provide limits for the wastewater but no limits have been prescribed for the solid waste. There are no rules or guidelines available for the sewage and solid waste treatment and disposal from schools. The environmental authorities mainly focus on the industries for the compliance of environmental law whereas the enforcement for houses, public and commercial buildings and schools are not given any consideration.

## **Construction of New Classrooms**

**119.** The national and provincial environmental protection acts require that no proponent of a project shall commence construction or operation unless he/she has filed with the relevant environmental protection agency an initial environmental examination or where the project is likely to cause an adverse environmental affect, an environmental impact assessment, and has obtained the approval from the agency. The Review of IEE and EIA Regulations of Federal, KPK and Balochistan do not require filing of IEE or EIA for the construction or expansion of schools. Punjab regulation requires filing of IEE performa for the construction of new rural schools only (not the urban schools) under Schedule III. Construction or expansion of new classrooms/WASH facilities do not require IEE performa. Sindh regulation requires filing of IEE for the construction of educational, academic institutions on land less than 10 acres under Schedule I and filing of environmental screening through checklist for rural schools (Secondary and Higher Secondary) under Schedule III. Construction or expansion of new classrooms/WASH facilities do not require IEE/screening checklist.

**120.** There are two provincial laws i.e. The Punjab Occupational Safety and Health Act, 2019 and The Sindh Occupational Health and Safety Act, 2017 in the country which focus on the safety of the construction workers.

**121.** In terms of Program systems and capacity, the major findings indicate that there are plans, policies, strategies and guidelines which emphasize WASH in school, sanitation and supply of water and drinking water to the community. Education departments do not have specific standards and guidelines for WASH facilities and supply of water and drinking water to the schools and enforcement mechanism. Monitoring and evaluation of the WASH facilities is only included in the school inspection systems of provincial education departments. School monitoring/inspection is mostly focused on academic affairs (teachers and student attendance, condition of furniture and equipment, quality of education, and condition of buildings) and less on supply of water for sanitation, safe drinking water (water quality testing), hygiene products and O&M of the WASH facilities.

**122.** Specific environmental and social monitoring system does not exist in the provinces. Environmental and social assessment studies are not carried out to evaluate and manage environmental and social risks associated with the school operations and education. Dedicated

environmental and social persons do not exist in the education departments for conducting environmental and social assessments.

**123.** Enforcement of the provincial occupational safety and health laws is weak in the provinces. The inspectors don't have the capacity to enforce these laws in the provinces. Building safety standards are applied by the local governments and development authorities in the provinces and same are applied on school buildings.

### **e-Waste Management**

**124.** In terms of program systems and capacity, the major findings indicate that current regulations at both provincial and federal levels, lack specific provisions pertinent to e-waste management. Hazardous substances, mentioned under Hazardous Substance Rules, 2003, to be controlled, do not mention e-waste, rather different hazardous chemicals and heavy metals are mentioned which can be the part of the e-waste or released during dismantling, burning, chemical processing or disposing on the land. Enforcement of these provisions are weak in the country due to lack of enforcement infrastructure and resources. There are no certified e-waste recycling facilities and recyclers in Pakistan for environmentally sound recycling of e-waste generated in the country. The education departments will be unable to deliver their e-waste to such recyclers or to such facilities.

**Table 2: Core Principle 1- Environmental and Social Management**

<b>Core Principle 1: Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision-making relating to a program’s environmental and social effects.</b>			
<b>Key Planning Elements</b>	<b>System Assessment</b>	<b>Capacity Assessment</b>	<b>Recommendations</b>
<p>Program procedures operate within an adequate legal and regulatory framework to guide environmental and social impact assessment at the program level</p>	<p><b>WASH</b> Current policy and regulations at provincial and federal levels, lack specific provisions pertinent to School WASH. There is no specific law enforcing WASH facilities to be installed in schools, assess the environmental and social impacts and require mitigation measures</p> <p><b>Sewage and Solid Waste</b> Under national and provincial environmental protection acts, the wastewater and the solid waste discharge is controlled. The sewage and solid waste is not properly treated and disposed at schools facilities.</p> <p><b>Construction of New Classrooms</b> NOC is required prior to construction and operation of any project from the Federal and Provincial environmental agencies by submitting IEE/EIA or environmental screening checklist. Environmental and social</p>	<p><b>WASH</b> Education departments do not have specific standards and guidelines for WASH facilities and supply of water and drinking water to the schools and enforcement mechanism. WASH is included in the school monitoring/inspection system, but it is not effectively used. Drinking water quality is not checked.</p> <p><b>Sewage and Solid Waste</b> EPAs do not conduct environmental monitoring of existing schools. EPAs focus is on industries only.</p> <p><b>Construction of New Classrooms</b> No environmental approvals are required for the construction of new classrooms.</p> <p><b>Environmental &amp; Social (E&amp;S) Capacity Assessment</b> Capacity of education departments is limited for the environmental and social</p>	<p><b>Environmental, Health, Safety and Social (EHSS) Guidelines.</b> The borrower should prepare Environmental, Health, Safety and Social (EHSS) Guidelines for school facility to cover following:</p> <p><b>WASH</b> Ensure construction and operation of WASH facilities as per standard and regular supplies of water, safe drinking water, hygiene products and services.</p> <p><b>Sewage and Solid Waste</b> Construction and operation of proper treatment and disposal of sewage and solid waste.</p> <p><b>Construction of New Classrooms</b> Ensure compliance with local government and development authorities building bylaws and safety standards and confirm environmental and safety risks of the construction activities are mitigated.</p>

	<p>impact assessment of the project activities is the part of IEE and EIA reports. No environmental screening is required for construction or expansion of new classrooms/WASH facilities in existing schools. Local governments and development authorities building bylaws for schools and safety standards apply to school buildings.</p> <p><b>e-Waste</b> There are no specific provisions for e-waste management in the environmental regulations. There is no certified or licensed e-waste recyclers and their facilities in the country. The education departments don't have SOP for safe handling, storage and disposal of e-waste.</p>	<p>assessment of the activities and programs executed by the education departments in different provinces. E&amp;S studies/surveys are not carried out to evaluate and manage E&amp;S risks associated with the education activities. There is no department/section in any of the education departments and no person is dedicated for the E&amp;S assessment, studies or the surveys. The regulators don't have awareness and capacity to establish and enforce e-waste management rules.</p>	<p><b>COVID-19 SOPs</b> SOPs will be developed and enforced for the construction workers and the school staff and students to protect themselves against corona virus. These SOPs will be part of the Guidelines.</p> <p><b>Hygiene Products and Services Budget</b> The provincial education departments should consider to include recurring expenses of providing hygiene products and services at schools in their annual budgets.</p> <p><b>e-Waste</b> Develop e-waste management SOPs and handle waste accordingly.</p>
<p>Program procedures incorporate recognized elements of environmental and social assessment good practices, including (a) early screening of potential effects</p>	<p>Initial Environmental Examination (IEE), Environmental Impact Assessment (EIA) and environmental screening through checklist is carried out for the new projects prior to their construction and operation under Review of IEE and EIA Regulations. The regulations of Federal, KPK</p>	<p>Provincial EPAs have adequate capacity for review and approval of IEE/EIA and monitoring of its compliance requirements but rarely conduct the environmental and social assessment of schools.</p>	<p>Borrower should consult EPAs for the development of EHSS Guidelines. These guidelines need to be approved by EPA.</p> <p>The screening checklist should include encroachers at school premises as part of evaluation of sites for construction or any work that</p>

	<p>and Balochistan do not require filing of IEE or EIA for the construction of schools. Punjab regulation requires filing of IEE performa for the construction of rural schools only (not the urban schools) under Schedule III. Sindh regulation requires filing of IEE for the construction of educational, academic institutions on land less than 10 acres under Schedule I and filing of environmental screening through checklist for rural schools (Secondary and Higher Secondary) under Schedule III.</p>		<p>could expand the physical footprint of buildings.</p>
<p>(b) consideration of strategic, technical, and site alternatives (including the 'no action' alternatives)</p>	<p>Site alternatives are considered during environmental impact assessment under Review of IEE and EIA Regulations. The construction of schools don't require EIA studies so the consideration of the site alternatives is not the requirement. Under the program only new classrooms and WASH facilities will be constructed for which there is no requirement of submitting any environmental assessment document to the agency.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>

<p>c) explicit assessment of potential induced, cumulative, and trans-boundary impacts</p>	<p>Environmental assessment is not required for the construction of new classrooms and WASH facilities at schools under the law.</p> <p>There is no system of environmental assessment in any of the educational departments for the projects activities.</p>	<p>Education departments don't have the capacity for environmental assessment. Capacity of EPA is adequate regarding EIA.</p>	<p>Ministry of Education, Education Departments, and EPAs staff should be trained on EHSS Guidelines and its implementation.</p> <p>Focal persons with sufficient experience and qualification to achieve environmental and social compliances under EHSS Guidelines should be designated in the Ministry of Education, and provincial education departments.</p>
<p>d) identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized</p>	<p>Currently the construction of new classrooms/WASH facilities is not regulated through existing laws. There is no system of environmental management at educational departments.</p>	<p>No approvals are required under the law for the construction of new classrooms/WASH facilities. There is neither capacity nor the system of the educational departments to propose and implement mitigation measures.</p>	
<p>e) clear articulation of institutional responsibilities and resources to support implementation of plans</p>	<p>Provincial Environmental Protection Agencies are the concerned regulatory and monitoring institutions responsible for environmental management in the province. The educational departments are responsible for the environmental and social management of their activities.</p>	<p>Construction of new classrooms/WASH facilities are not controlled under the law.</p> <p>Education departments don't have capacity and systems to assess and manage environmental and social impacts of their project activities.</p>	<p>EHSS Guidelines for school facility will define the institutional responsibility</p>

<p>f) responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and through responsive grievance redress measures</p>	<p>All investment projects are duly approved by the provincial assembly as a part of annual budget which are disclosed in web sites of respective departments.</p>	<p>Adequate processes exist for information dissemination and disclosure.</p>	<p>Need to develop consolidated GRM of the program. The program information should be disseminated in local languages for effective communication and outreach</p>
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### **C. Core Principle 2 – National Habitats and Physical Cultural Resources**

**125.** *Core Principle 2: Environmental and social management procedures and processes are designed to avoid, minimize, and mitigate against adverse impacts on natural habitats and physical cultural resources resulting from the program.*

**126.** Given the scope of the proposed program's activities, the ESSA team concludes that the program is unlikely to have any adverse impacts or pose any risk for natural habitats and physical cultural resources.

### **D. Core Principle 3 – Public and Worker Safety**

**127.** ESSA team assessed that the sewage generated from the school toilets can be the source of pathogens. It will be a potential health risk for the school children, staff and the community, if this sewage is not properly treated and disposed through sewers or closed drains at appropriate disposal site and dumped openly without any treatment. The open disposal of sewage will result into breeding of mosquitoes and flies, the source of outbreak of diseases in the community. This sewage can also contaminate water resources and the source of water borne diseases such as diarrhea, typhoid, cholera, dysentery, and hepatitis.

**128.** Construction of new classrooms and WASH facilities are envisioned under the program. These construction activities can pose safety risks to the workers. In case, if workers do not follow safety protocols, there are chances of accidents not only for construction workers but also for the nearby community.

**129.** Different hazardous materials are released during e-waste recycling. These materials include hazardous chemicals and heavy metals which are released into the environment and pose health and safety risks. Hazardous materials are released when e-waste is dismantled, plastic parts are burnt, metals are recovered through chemical processes and discarded parts are disposed on land and water under unsafe manner. Owing to unsafe recycling practices the health and safety of workers involved in the e-waste recycling operations and communities living in the vicinity of e-waste recycling operations are at risk.

**130.** In terms of program systems and capacity, the major findings indicate that the wastewater and the solid waste discharge is controlled under national and provincial environmental protection acts. Under these acts, no person is allowed to discharge or emit any effluent or waste or air pollutant or noise in an amount, concentration or level which is in excess of the specified Environmental Quality Standards (EQS). These EQS provide limits for the wastewater. However, the environmental authorities mainly focus on the industries for the compliance of environmental law whereas the enforcement for houses, public and commercial buildings and schools are not the priority. Education departments do not have specific standards and guidelines for WASH facilities to ensure treatment and disposal of sewage from school toilets.

**131.** There are two provincial laws i.e. The Punjab Occupational Safety and Health Act, 2019 and The Sindh Occupational Health and Safety Act, 2017 in the country which focus on the safety of the construction workers. However, there is limited enforcement of these laws in the provinces. The inspectors don't have the capacity to enforce these laws in the provinces. Building safety standards exist in the provinces and same are applied on the school buildings. For e-waste management, the regulators are lacking in awareness and capacity to regulate e-waste. The education departments are also not aware of the e-waste management.

**Table 3: Core Principle 3- Public and Worker Safety**

<b>Core Principle 3: Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.</b>			
<b>Key Planning Elements</b>	<b>System Assessment</b>	<b>Capacity Assessment</b>	<b>Recommendations</b>
Promotes community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed.	<p>There will be construction of new classrooms and WASH facilities at different schools. There are two provincial laws i.e. The Punjab Occupational Safety and Health Act, 2019 and The Sindh Occupational Health and Safety Act, 2017 in the country which focus on the safety of the construction workers.</p> <p>There is no system in any of the education departments to ensure safety of the construction workers and the community.</p> <p>Local government and development authorities building bylaws and safety standards are applied while extending approval.</p>	<p>There is limited enforcement of the provincial occupational safety and health laws in the provinces.</p> <p>The inspectors don't have the capacity to enforce these laws in the provinces.</p>	<p>Section on occupational and health and safety and building safety should be part of the EHSS Guidelines. Ministry of Education, provincial education departments' staff should be trained in occupational health and safety aspects.</p>
Promotes the use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through	<p>Current regulations do not cover specific provisions on e-waste management. Environmental Protection Act includes general provision on</p>	<p>Regulators lack in awareness and capacity to develop and enforce e-waste management guidelines/rules in the country.</p>	<p>Prepare SOPs for environmental management of e-waste</p>

<p>program construction or operations; and promotes the use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions.</p>	<p>the handling of hazardous substances but not the e-waste. Hazardous Substance Rules 2003 don't mention e-waste as hazardous substance so no rules are applied on it. No pertinent guidelines/rules are provided. No regulated recyclers and recycling facilities in the country. There are no SOPs for e-waste handling in the education departments.</p>	<p>Education departments lack in awareness regarding e-waste management. There are no SOPs for its management.</p>	
<p>Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.</p>	<p>No assessment is required as the program activities do not involve construction activities which could be affected by severe weather or climate events.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>

## **E. Core Principle 4 – Land Acquisition**

**132.** *Core Principle 4: Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.*

**133.** Given the scope of the proposed program's activities, the ESSA Team concludes that the program is not likely to have any adverse impacts or pose any risks caused by the acquisition of land or the restriction of use or access to land or natural resources, including the loss of income caused by such actions. Program activities will involve only the construction of new classrooms and WASH facilities at the existing schools; there will be no land clearing activities which could result in land acquisition and/or displacement of people and affecting their livelihood and living standards. Hence this core principle is not included in the ESSA.

## **F. Core Principle 5 – Indigenous Peoples and Vulnerable Group**

**134.** *Core Principle 5: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.*

**135.** In Pakistan, Kalash people, living in Chitral Valley (Province Khyber Pakhtun Khwa) are recognized as Indigenous Peoples under WB ESF Environmental and Social Standard 7. This program is for all the provinces of Pakistan so there will program activities at KPK province as well. Program intervention will also take place at Chitral Valley and the public schools at Kalash valley will also be the focus of the equitable access and quality of education for the Kalash people.

**136.** At present there is no system at the Elementary and Secondary Education Department, KPK, to undertake free, prior and informed consultations with the Kalash people to determine broad community support for the education projects to be started at Kalash valley. Consultation with the Kalash people will be important to give special attention to the rights and interest of the Kalash people. It is required that the Kalash people are given due consideration to cultural appropriateness of, and equitable access to, program benefits.

**137.** This program has emphasize on vulnerable groups and disadvantaged areas of the province to provide equitable access and quality of education to the children and mobilize community to enroll their children in schools or distance education system to reduce OOSC and dropout students and support at risk and hard to reach children to get education.

**138.** The program will setup distance learning to reach out to the 50 million COVID-19 effected, 22.8 million OOSC and other at-risk students of the country, with particular emphasize on the disadvantaged areas of different provinces. Effective design and implementation of distance learning will help in returning the effected students.

**139.** Socioeconomic survey is the part of the EIA study in which the affected community is consulted and their concerns are recorded. Public hearing is also carried out prior to granting NOC from the environmental agencies. However, these requirements are only for the infrastructure projects. As such, government departments are not required to consult vulnerable groups for their inputs into any interventions that can have perceivable impacts on them.

## **G. Core Principle 6 – Social Conflict**

**140.** *Core Principle 6: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.*

**141.** Local level cultural and sensitivity issues are covered under requirements of environmental assessments especially in projects financed by the World Bank and other multilateral and bilateral institutions.

**142.** Although there is no overt social conflict anticipated due to the program. It may cause social friction if distance learning education is not designed as per the sociocultural norms of the society and the access and quality of education is not equitable to all the provinces. If program activities don't address socioeconomic factors responsible for learning poverty, the people will have an aversion to the government. There can be social disparities among different segments of the societies, if program benefits are not communicated transparently.

**143.** Program activities will support to digitize the office work at education department. In case if those employees of the education departments, having no or limited ICT knowledge, are not involved in the mainstream by enhancing their ICT capabilities, there may be social divide and distress among them.

## **IV. DISCLOSURE AND CONSULTATION**

### **A. Disclosure**

**144.** This draft ESSA will be disclosed in-country and on the World Bank's external website, prior to formal appraisal of the relevant PforR, to serve as the basis for discussion and receipt of formal comments. Following incorporation of the feedback received from different stakeholders, the revised ESSA will be disclosed in-country and on the World Bank's external website.

### **B. Stakeholder Consultations**

**145.** Due to COVID lockdown, meetings through webex and zoom were conducted with the officials of the Ministry of Education and provincial Education Departments. ESSA will be submitted to Ministry of Education and provincial Education Departments for comments. Later on online workshop will be organized to make the presentation to the stakeholders for comments. Comments raised by stakeholders will be incorporated in ESSA. Proceedings of the stakeholder workshop will be also be prepared and attached as Annex to ESSA. Most probably, these consultations will be conducted in July 2020.

**146.** The Kalash people of Chitral Valley will be consulted by the Education Department of KPK. The Kalash people living in Bamburet, Rumbur and Birir valleys will be engaged through focused group discussions and meetings with the key informants (eminent and influential members of the society) and the women. There are many NGOs and INGOs working in these valleys such as Kalash Foundation, Pakistan Poverty Alleviation Fund (PPAF), Kalash People Welfare Society etc. These organizations will also be engaged in consulting Kalash people and getting their feedback to appropriately design the program activities as per their needs and requirements. Similarly other vulnerable groups, to be most affected, identified through social assessment, will be consulted during program activities.

### **C. Summary of the Stakeholder Consultation**

Summary will be inserted after the stakeholder consultation workshop.

## V. INPUTS TO THE PROGRAM ACTION PLAN

### A. Introduction

**147.** This section summarizes the measures that the ESSA team recommends to be included in the Program Action Plan and should be executed during program implementation to address important gaps identified above between the program system and the PforR core principles and key elements as well as to address any capacity shortcomings.

**148.** As noted in Section III, the ESSA identified the following issues as needing additional action:

- (b) **WASH in schools is not effectively covered by the system and system lacks capacity to monitor WASH activities in schools.** The Education Departments do not have specific standards and guidelines for WASH facilities and supply of water and drinking water to the schools and enforcement mechanism. Limited inspection is conducted under the school inspection system of Education Departments. Resultantly, large percentage of schools are without WASH facilities and wherever these are available these are not maintained and operated to desired standards. Provincial EPAs only take actions after complaints are registered. It is rare that EPAs did the environmental monitoring of schools in the provinces.
- (b) **Limited enforcement of the OHS laws in the provinces for workers safety:** There are two provincial laws i.e. The Punjab Occupational Safety and Health Act, 2019 and The Sindh Occupational Health and Safety Act, 2017 in the country which focus on the safety of the construction workers. However, there is limited enforcement of the provincial OHS laws in the provinces. The inspectors don't have the capacity to enforce these laws in the provinces.
- (c) **Limited consultations by the Education Departments with the indigenous people (Kalash people) for program intervention:** There is no system at the Elementary and Secondary Education Department, KPK, to undertake free, prior and informed consultations with the Kalash people to determine broad community support for the education projects to be started at Kalash valley.
- (e) **A procedural gap in planning and development of projects regarding vulnerable people.** Education Departments are not required under operational procedures to consult vulnerable groups (poor, landless, ethnic and religious minorities, disabled, women, etc.) for their inputs while designing and developing interventions that can have perceivable impacts on them.
- (e) **Lack of integration within multiple GRM systems.** There are multiple GRMs operational in different forms. Existing Grievance Redress Mechanism has spread in the system of Provincial Governments and departments. There is a need for the Program specific GRM system to be developed and implemented by borrowers.
- (g) **No specific legal provisions are available for e-waste management.** Currently, regulations on e-waste management is lacking in the country. Furthermore, the educational departments do not have any rules/ procedures for the safe handling and

disposal of end of life ICT equipment. The e-waste recycling facilities are operating in informal sector and are not regulated under any regulations.

149. The recommendations and proposed actions are described in detail below:

## **B. Recommendations to be Included in the Program Action Plan**

**150. Recommendation 1: The Ministry of Federal Education and Professional Training, in collaboration with the partner provincial Education Departments, and provincial EPAs will prepare the Environment, Health, Safety and Social (EHSS) Guidelines for the Program. EHSS Guidelines will focus on providing guidelines, mitigations, and monitoring system for following:**

- Construction and operation of WASH facilities in schools in environmentally safe manners based on existing WASH guidelines prepared by UNICEF. EHSS Guidelines should include WASH standards, inventory of WASH facilities, and hygiene products and services, O&M guidelines, sewage and solid waste treatment and disposal guidelines and monitoring and evaluation procedures to ensure WASH sustainability at schools.
- Management of environmental and safety risks of the construction activities at schools. EHSS Guidelines should provide guidelines for safe construction operation about workers safety and the environmentally controlled activities. The Guidelines should include specific measures for identifying, handling and disposing of hazardous material during construction activities (e.g. asbestos containing roofing or other material). The international best practices for construction activities can be considered while developing the Guidelines. EHSS Guidelines related with construction activities should be part of all the construction contracts.
- SOPs will be developed and enforced for the construction workers and the school staff and students to protect themselves against corona virus. These SOPs will be the part of the Guidelines.
- EHSS Guidelines should be approved by provincial EPAs.

**151.** Pakistan Poverty Alleviation Program (PPAF) is using Environment and Social Management Framework (ESMF) for the implementation of community infrastructure projects throughout Pakistan. School and WASH activities are covered by the ESMF. The ESMF was prepared for a long-term World Bank program implemented by PPAF. This Program can develop its EHSS Guidelines based on the guidelines established in PPAF ESMF<sup>11</sup>.

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<sup>11</sup> PPAF ESMF ensures that social and environmental safeguards are mainstreamed in program interventions in a way that these do not have any significant negative environmental and social impacts. This practice is carried out through forms 'A' (project description and mitigation measures) and 'B' (completion certificate) that contain environmental and social guidelines specific to type of infrastructure project or intervention. Safe drinking water is covered under water resources management, latrines are covered under wastewater management, and school construction/renovation under social sector development. PPAF in collaboration with its Partner Organizations (POs) is successfully implementing the ESMF. It is simple to implement. PPAF conducted numerous trainings of their own and POs staff. Later PPAF ensured through effective monitoring that POs comply with the ESMF. Successful implementation

#### **152. Recommendation-2: EHSS Guidelines Training**

- The Environment and Social (E&S) focal persons with sufficient experience and qualification to achieve environmental and social compliances under EHSS Guidelines should be designated in the Ministry of Education, and provincial education departments.
- The program teams in the Ministry of Federal Education and Professional Training and the provincial education departments should be trained for the implementation of EHSS Guidelines as part of the capacity-building activities under the program.

#### **153. Recommendation-3: Social risk assessment of vulnerable and indigenous people**

- Social assessment should be carried out in order to assess the vulnerability, impediments and susceptibility of the vulnerable people and the indigenous people. The purpose of the social assessment is to inform the vulnerable groups and the indigenous people about the program activities and give due consideration to their needs and social constraints in designing program activities. The study will help in designing and implementing distance education and the outreach campaign at different disadvantaged areas.
- The Social Assessment should include i) identification of employees of educational departments lacking in digital knowledge and ICT training need assessment, ii) identification of the most affected vulnerable groups and Indigenous People (Kalash People), iii) propose the mechanism (tools, language etc.) to consult them and engage during project activities, iv) address the potential SEAH risks for students and teachers and among workers during construction activities at schools, v) strategies for effective management of COVID-19 related risks during stakeholder consultation, communication/outreach activities and schooling, vi) suggestion for the design of communication and outreach activities based upon the sociocultural norms of different lagging areas of the country (tools, language etc.), vii) assessment of the socioeconomic constraints of the OOSC and at risk students, and viii) factors relevant to the design of GRM.
- The construction site monitoring and supervision should be given particular attention to SEAH aspect, as often safeguarding against SEAH is not integrated properly into construction activities. Project staff responsible for monitoring and supervision should be alert for SEAH risks.

#### **154. Recommendation-4: Training of the employees on use of ICT**

- The employees of the Education Departments should be trained on use of ICT and smart technologies. This training will be beneficial for the employees, lacking in digital knowledge, to keep them in the mainstream to avoid social divide and distress among them. This training will be need based and appropriate to the requirement of each department.

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of ESMF is claimed by PPAF as one of the success stories. [http://www.pfaf.org.pk/doc/ESM-TPVs/PPAF%20Environment%20&%20Social%20Management%20Framework%20\(5th%20Ed\).pdf](http://www.pfaf.org.pk/doc/ESM-TPVs/PPAF%20Environment%20&%20Social%20Management%20Framework%20(5th%20Ed).pdf)

**155. Recommendation 5: Prepare SOPs for e-waste management**

- The Ministry of Federal Education and Professional Training in collaboration with the educational institutions should develop Standard Operating Procedures (SOPs) for the procurement and disposal of e-waste based on current World Bank's Environment, Health and Safety (EHS) Guidelines, based upon general and industry specific examples of Good International Industry Specific Practices (GIIPs). Similar recommendation was made for World Bank financed 'Punjab Public Resource Management Program (PPRMP)'. Both programs can collaborate for the development ICT SOPs.

**Table 4: Recommended Inputs for Program Action Plan**

#	Action	Responsible Department	Timeline	Estimated Cost (US\$)	Progress Indicator	Output/Target values
1	EHSS Guidelines Development	MoFEPT, SELD, SED, ESED, SED, EPAs	First six months of program implementation	30,000	EHSS Guidelines	
2	EHSS Guidelines Training	MoFEPT, SELD, SED, ESED, SED, EPAs	Six to twelve months of the program implementation	25,000	Proceedings of trainings	
3	Social risk assessment of vulnerable and indigenous people	MoFEPT, SELD, SED, ESED, SED	First six months of program implementation	10,000	Social risk assessment report	
4	ICT SOPs + Training of the employees on ICT	MoFEPT, SELD, SED, ESED, SED	First twelve months of the program implementation	30,000	Proceedings of the trainings	

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## **ANNEX 2: STAKEHOLDER CONSULTATION PROCEEDINGS**

**Stakeholder Consultation will inserted after the consultations**

## **ANNEX 3: DESCRIPTION OF ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM AND CAPACITY AND PERFORMANCE ASSESSMENT**

### **Introduction**

1. This section describes the existing environmental and social management system of the institutions applicable in the implementation of the proposed program. It provides an overview of the policy and legal framework and a profile of the roles and responsibilities of the institutions involved in the environmental and social assessment and management.
2. There are many federal and provincial policies and legislations relevant to the overall management of the environmental and social impacts. Those policies and legislations are described which have relevance with the potential environmental and social impacts of the proposed program.

### **Environmental Management System**

#### **Policy Framework**

3. In 2010, the 18th Constitutional Amendment was approved by the National Assembly of Pakistan. Under the amendment, environmental functions in the territory of the federal capital were delegated to Pakistan Environmental Protection Agency (Pak-EPA), and Provincial Environmental Protection Agencies were delegated the environmental management functions of provinces. In 2012, the federal government converted the Ministry of Environment to the Ministry of Climate Change (MCC). The MCC is mainly responsible for managing common national-level environment issues and climate change impacts and implementation of international conventions signed by the Government of Pakistan.

#### **Climate Change Policy of Pakistan, 2012**

4. Climate Change Policy (CCP) establishes that urban areas in Pakistan are already affected by short-term climate changes. In the long term, it is predicted that urban areas located in the irrigated plains and coastal areas will be significantly affected by climate changes. It is predicted that due to climate changes, changes in hydrological cycle (intensive and erratic monsoon rains, flash floods, increased availability of water due to increased melting of glaciers in the short term, and decrease in water availability in the long term due to decrease in glacier flows) and increase in temperature will affect urban areas. 50 cyclonic storms developed in the northern Arabia Sea during 1946-2004. Four storms hit the coast of Karachi resulted in heavy downpours, flash-floods, and loss of life and property.
5. CCP predicts that due to climate change, extreme weather events such as heat and cold waves, heavy or too little precipitation, and strong winds will occur more frequently and will cause health impacts in urban areas, for example, diarrheal diseases because of insufficient clean water availability for drinking and personal hygiene. It is predicted that vector-borne diseases such as malaria and dengue fever may increase. Similarly, extreme weather events will express themselves in the form of natural disasters such as floods, droughts, landslides, and urban flooding. It is assessed that Karachi will be exposed to the above mentioned climate change impacts.

6. CCP recommends the following actions: develop city-specific strategic plans, prepare and enforce legislation for water resource management in industry and domestic sectors with special focus on groundwater, adopt water efficiency measures and technologies, adopt rain harvesting measures, avoid excessive groundwater pumping, reuse wastewater after treatment, take flood protection measures, assess the health vulnerabilities of communities and build their capacities, develop proper disaster management system, redesign and upgrade drainage capacity of cities, strengthen early warning systems, develop enabling mechanisms for the adoption of climate change adaptations and mitigation measures; and conduct awareness campaigns to underscore the importance of conservation and sustainable use of water resources.

7. Generally, the implementation of CCP is nominal due to limited interprovincial coordination; low capacity of provincial departments, and city authorities; and low level of budgetary allocation for climate smart city development. Climate change impacts are relevant to the schools especially located in the flood zones of Pakistan.

### **National Water Policy**

8. The objective of the National Water Policy is to take cognizance of the emerging water crisis and provide an overall policy framework and guidelines for a comprehensive plan of action. This policy is a national framework within which the provinces can develop their master plans for sustainable development and management of water resources.

9. Following are the objectives of National Water Policy:

- Promoting sustainable consumption and production patterns throughout the water sector from exploitation to utilization
- Augmentation of the available water resources of the country through judicious and equitable utilization via reservoirs, conservation and efficient use
- Promoting behavioral change to reduce wastage of water by raising public awareness through media campaigns and incorporating water conservation lessons in syllabi/curricula at primary, secondary and tertiary levels
- Treatment and possible reuse of wastewater - domestic, agricultural and industrial
- Promoting appropriate technologies for rainwater harvesting in rural as well as urban areas
- Regulating groundwater withdrawals for curbing over-abstraction and promoting aquifer recharge
- Climate change impact assessment and adaptation for sustainable water resources development and management

10. Following are the policy measures:

#### Comprehensive Regulatory Framework

The Federal government must play a leading role in facilitating regulations to ensure the efficient and sustainable utilization of groundwater, industrial uses, and wastewater management. Food security, water security and energy security being inextricably linked, so the regulatory framework must address all the associated issues comprehensively, including ground water contamination, waste treatment, open defecation (WASH).

#### Planning Principles

- Efficiency and conservation will be promoted at all levels

- Environmental Sustainability must be ensured

### Conservation of Water

The Water Conservation Plans shall include: Conservation of Water: re-use and recycling of municipal and industrial waste water effluent after appropriate treatment at source adoption of rainwater harvesting technology

### Demand Management

It is recognized that fresh water, being a finite resource, cannot fulfill unlimited demand of numerous users. Demand Management of various uses shall, therefore, be accorded high priority.

Demand Management Plans shall be prepared for all uses, specifying measurable targets, and shall be rigidly enforced.

**11.** Water use efficiency in all sectors shall be vigorously pursued, and towards this end all avenues like professional, administrative, legal, technologies transfer and research application coupled with appropriate economic and financial incentives shall be explored.

**12.** Under National Water Policy, National Water Council is proposed whose responsibility would be to implement the policy measures through different water related public sector organizations.

### **National Sanitation Policy 2007**

**13.** The primary focus of the sanitation policy is on the safe containment of excreta away from dwellings and workplaces by use of sanitary latrines and the creation of an open defecation-free environment. It emphasizes safe disposal of liquid and solid wastes and promotes good health and hygiene practices in the country.

**14.** It recommends that sanitation schemes should be financed through local resources and implemented by strengthened local and community institutions with the involvement of the Government, private sector, and NGOs. It recommends that installation and O&M of sanitation schemes should be institutionally synchronized. The policy states that needs of women and children should be covered as priority.

### **Sindh Sanitation Policy 2017**

**15.** The vision of the policy is to provide the population of Sindh the better sanitation service and to make sure that the entire population of Sindh has access to a safely managed sanitation service and sanitary environment that is also nutrition sensitive and hygienic.

**16.** The key targets of the policy are to eradicate open defecation from Sindh province by 2025, while 70% villages of 13 high priority districts achieve the status of open defecation free by 2020, 100% households in Sindh have access to and use sanitary latrines by 2025, while 70% of rural households in high priority districts will achieve this by 2020, to strengthen and implement liquid waste with sewer lanes and covered/improved drains with 85% coverage of urban areas and 60% coverage in rural areas, to create and develop wastewater treatment mechanisms to cover 75% of urban areas and 40% rural areas by 2025, to implement integrated solid waste management with 100% coverage in urban areas and 60% in rural areas by 2025.

**17.** The policy is built upon thirteen principles including i) alignment with the goals and targets of the Sindh Development Goals (SDGs) for sanitation, ii) adherence to the pursuit of total sanitation as outlined in Pakistan Approach to Total Sanitation (PATS), within the province, iii) safely managed sanitation services for all persons in Sindh province, iv) prioritize the areas that pose the greatest risk to human health namely hygiene awareness and excreta disposal, v) recognizing that inadequate and unsafe water supply and sanitation as major cause of diarrhea and nutritional deficiency in children, vi) increase access to high quality nutrition sensitive services, including access to water, sanitation facilities and hygiene, vii) integrating key hygiene actions (safe drinking water, hand washing with soap, safe disposal of excreta, and food hygiene) and essential components in all nutrition programs, viii) promoting community led approaches to strengthen the demand for safely managed improved sanitary conditions, ix) identification and marketing of affordable (in terms of designs as well as availability of water) and cost effective technical solutions, x) ensuring the sustainability of the services by mobilizing and engaging existing structures, xi) envision of component sharing model in the National Sanitation Policy, xii) the role of women as an integral component of behavioral change communication strategies and project planning, implementing and monitoring, xiii) establishing and maintaining an independent monitoring and evaluation system to track progress.

### **Sindh Drinking Water Policy 2017**

**18.** The vision of the policy is to provide safely managed drinking water whose supply is adequate, well maintained and sustainable and to enhance public awareness about health, nutrition and hygiene related to safe drinking water.

**19.** The main principles of the policy are mainly based upon access to safely managed drinking water to every citizen, water allocation for drinking purpose as the priority over other uses, removing the existing disparities in coverage of safe drinking water and addressing the needs of the poor on priority basis, recognizing the cause of diarrhea and nutritional deficiency in children due to inadequate and unsafe water supply and sanitation, increase the access to high quality nutrition sensitive services (including access to water, sanitation facilities and hygiene), integration of key hygiene actions (safe drinking water, hand washing with soap, safe disposal of excreta, food hygiene) as essential components in all nutrition programs, realizing the fact that access and availability of safe drinking water affects all aspects of life of a citizen, ensure women participation in planning, implementation, monitoring and operation and maintenance of water supply systems, delegation of responsibilities and resources to local authorities for the provision of safe water supply, development of supportive policy framework to encourage alternative options through stakeholders, promotion of execution of component sharing model for government programs and projects to ensure financial sustainability and development and use of low cost technologies in water and sanitation.

**20.** The overall goal of the policy is to improve the quality of life of people of Sindh by reducing morbidity and mortality caused by water borne diseases through provision of safely managed and potable drinking water to the entire population that is located on premises, available when needed, and free from contamination, affordable and of sufficient quantity, and in a way that is efficient, equitable and sustainable.

**21.** The specific objectives address mainly the introduction of legislative measures to create enabling environment, involvement of community in the water supply systems, development of district level drinking water availability plans, enhance the coverage of the safely managed drinking water in the province, development of criteria for installation of new drinking water supply

schemes, standardized service delivery models for both urban, and rural drinking water supply schemes to improve efficiency and mechanisms for reuse, recycle and recharge of wastewater for other municipal and productive uses, ensuring the compliance of all the drinking water supply schemes and municipal discharges with the environmental quality standards, installation of water treatment plants at existing drinking water supply schemes, development of water safety plans for all drinking water supply systems, develop and sustain regular drinking water quality monitoring and surveillance and remedial action, increase public awareness about water related diseases, nutrition and hygiene, ensuring drinking water supply projects to be nutrition sensitive, institutionalize Water, Sanitation & Hygiene (WASH) in school and institute adaptation measures and disaster risk reduction and mitigation strategies to minimize the impact of climate events on drinking water supply systems.

### **Khyber Pakhtunkhwa Drinking Water Policy 2015**

**22.** The Khyber Pakhtunkhwa (KPK) Drinking Water Policy (2015) envisions a better quality of life for the people of KPK through universal access to adequate quantities of potable water. Specific objectives of the policy are to enhance the drinking water supply coverage in the province, introduce reforms in the drinking water supply sector, ensure protection and conservation of water resources, promote cost effective and appropriate technological options for water supply systems, increase public awareness about water protection and conservation, safe hygiene practices and the nexus between sanitation and safe water supply services.

### **Punjab Drinking Water Policy 2011**

**23.** The vision of the policy is to provide safe drinking water of an adequate quantity at an affordable cost through equitable, efficient and sustainable services to all citizens by 2020. In order to translate this vision into reality, the Government of Punjab shall introduce measures to ensure sector reforms, political consensus, judicious need-based resource allocations and effective stakeholder/community partnerships. The key objectives of the policy is to achieve the vision include: i) improving the standards of the public health through provision of improved services backed up by a legal, regulatory and binding framework, ii) laying down a roadmap for mobilization of the resources required to ensure provision of drinking water to all by the target timeline, assigning a priority to unserved and under-served areas of Punjab, iii) focusing on the capacity building of local governments and Private-Public Partnership to improve the operation and maintenance of water supply schemes, iii) focusing on the capacity building of local governments and Private-Public Partnership to improve the operation and maintenance of water supply schemes, iv) mobilizing demand for improved water supply through a communication campaign, which takes cognizance of conservation, demand management, and contamination issues, v) facilitating the introduction and institutionalization of an effective Monitoring and Evaluation System, which includes performance benchmarking in service delivery, vi) ensure protection and conservation of water resources, vii) serving basis for the development of sector strategies, both for urban and rural water sector, to translate policy principles into action.

### **Legislative Framework**

**24.** Following legislations are relevant for addressing the potential environmental and social impacts of the proposed program:

- Pakistan Environmental Protection Act 1997
- Provincial Environmental Protection Acts
- The Punjab Water Act 2019

- Provincial Occupational Safety and Health Acts

### **Pakistan Environmental Protection Act 1997**

**25.** PEPA 1997 is the basic legislative tool empowering the Government to frame regulations for the protection of the environment. It is a comprehensive legislation and provides the basic legal framework for protection, conservation, rehabilitation, and improvement of the environment. The act is applicable to a wide range of issues and extends to air, water, soil, marine, and noise pollution, and to the handling of hazardous wastes.

**26.** Under Section 11 'Prohibition of Certain Discharges or Emissions' no person is allowed to discharge or emit the discharge or emission of any effluent or waste or air pollutant or noise in an amount, concentration or level which is in excess of the National Environmental Quality Standards (NEQS). NEQS provides limits of wastewater discharge, air emission, and noise.

**27.** Under Section 12 'Initial Environmental Examination and Environmental Impact Assessment' no project construction or production is allowed to commence without conducting and submitting Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) study to the provincial agency and getting no objection certificate. Review of IEE/EIA Regulation provides guidelines for conducting and submitting IEE/EIA studies and getting NOC from the environmental agency.

**28.** Under the Hazardous Substance Rules, 2003, made under this act, license will be required for the import and transportation of hazardous substance from Federal or Provincial agency. The application for the grant of license for the industrial activity involving generation, collection, consignment, transport, treatment, disposal, storage, handling or import of hazardous substances, will also be accompanied with EIA report and safety plan. The validity of the license will be for three years from the date of issue. The licensee will notify any major accident occurring at licensed facility to provincial and federal agencies. There will be packing and labelling requirement, safety precautions for the premises and workers which will have to be followed. The licensed facility may be inspected by the provincial or federal staff.

### **Provincial Environmental Protection Acts**

**29.** All the four provinces have enacted their following provincial environmental protection acts:

- Punjab Environmental Protection Act 2012
- Sindh Environmental Protection Act 2014
- Khyber Pakhtunkhwa Environmental Protection Act 2014
- Balochistan Environmental Protection Act 2012

**30.** All these provincial environmental protection acts addresses prohibition of discharges and emissions of wastewater and air emissions, noise control, requirements of initial environmental examination and environmental impact assessment for the newly established development projects, and hazardous waste and substances.

**31.** Under these acts, no person is allowed discharge or emit any effluent or waste or air pollutant or noise in an amount, concentration or level which is in excess of the prescribed provincial Environmental Quality Standards. No one is allowed to import hazardous waste into

the province, generate, collect, consign, transport, treat, dispose of, store, handle or import any hazardous substance except he/she gets license from the authority.

**32.** These laws also address environmental impact assessment of the new projects. It is required that no project construction or production will be allowed to commence without conducting and submitting Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA) study or Environmental Screening Checklist, as per the category of the project, to the provincial agency and getting no objection certificate.

**33.** Under these laws, provincial agency can issue Environmental Protection Order where agency is satisfied that the discharge or emission of any effluent, waste, air pollutant or noise, or the disposal of waste, or handling of hazardous substance, or any other act or omission is likely to occur, or is occurring, or has occurred, in violation of any provision of this act, rules or regulations or of the condition of license, or is likely to cause, or is causing, or has caused an adverse environmental effect. The provincial agency may, after giving the person responsible for such discharge, emission, disposal, handling, act or omission an opportunity of being heard, by order, direct such person to such measures as the provincial agency may consider necessary with such period as may be specified in the order.

### **The Punjab Water Act 2019**

**34.** This act addresses the water and sewerage services in the province. For water services, Punjab Water Services Regulatory Authority will be established to enforce the provisions of the act in the province. Major focus of this act is to: i) appoint a company, a local government or a statutory authority to be the water undertaker or sewerage undertaker for any area and perform assigned duties, ii) regulations for preserving water quality, iii) provide permission to abstract water directly, iv) prevention of contamination, misuse and wastage of water, v) designating controlled water (rivers, natural reservoirs, etc.) and offences related with destroying these waters, vi) declaring water protection zones.

### **Provincial Occupational Safety and Health Acts**

**35.** Punjab and Sindh provinces have promulgated following two acts on occupational safety and health:

- The Punjab Occupational Safety and Health 2019
- The Sindh Occupational Safety and Health 2019

**36.** Under these acts, the employer would be responsible to ensure the health and safety of the workers at workplaces (construction sites are also considered as workplace under the act). These acts mention health and safety requirements which need to be ensured to be complied by the employer/site in-charge and the workers. The Chief Inspector and the inspectors appointed under the act shall be responsible to enforce health and safety requirements prescribed by the acts. Penalties shall be imposed in case of noncompliance of the requirements.

### **Institutional Framework**

**37.** Following institutions are involved in the management of environmental and social effects of the program activities:

- Ministry of Federal Education and Professional Training

- School Education Department, Government of Punjab
- School Education and Literary Department, Government of Sindh
- Elementary and Secondary Education Department, Government of Khyber Pakhtunkhwa
- Secondary Education Department, Government of Balochistan
- Pakistan Environmental Protection Agency
- Environmental Protection Department, Government of Punjab
- Sindh Environmental Protection Agency, Government of Sindh
- Environmental Protection Agency, Government of Khyber Pakhtunkhwa
- Environmental Protection Agency, Government of Balochistan

## **Ministry of Federal Education and Professional Training<sup>12</sup>**

**38.** Ministry of Professional and Technical Training was established in July 2011 in the wake of 18th Amendment. Some of the Departments/Organizations previously under Ministry of Labor and Manpower (MOLM) and Ministry of Education (MOE) were placed under this Ministry. Supreme Court of Pakistan in its Judgment dated 25th November, 2011 directed that in view of insertion of Article 25-A in the Constitution, the Federal Government cannot absolve itself from the responsibility of providing Education to its citizens.

**39. Vision:** “Developing Pakistan as a progressive and prosperous country by providing all citizens a fair and equal opportunity to receive quality education and skills to achieve optimum potential”

**40. Mission Statement:** “To develop human resources by ensuring equal access and educational excellence across Pakistan”

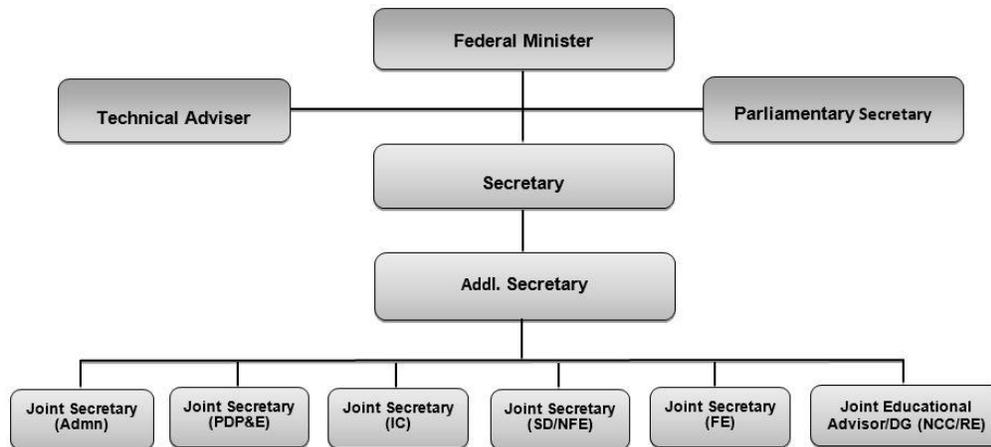
**41. Functions:** Following are the functions of the Ministry:

- National cohesion on education policies and reforms, and focusing national attention on education issues
- Lead Educational Standard setting
- Leading programs of national importance to ensure equity and cohesion
- Leading international cooperation and coordination on education matters
- Achieve universal literacy in the country
- Integration of Religious Educational Institutions
- Collect, analyze and disseminate information on key education indicators including student learning assessments and education financing
- Manage, supervise and implement formal education in schools and colleges under ICT through the Federal Directorate of Education
- Registration & regulation of Private Educational Institutions in ICT and enforcement of relevant rules & regulations on private education sector
- Contribute to the education of young through a value system based on the Scout Promise and Law
- Lead a coordination of academic evaluation across Pakistan, especially for quality in large scale student exams through the Inter Board Committee of Chairmen (IBCC)

**42. Organogram:** The organogram of the Ministry is as under:

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<sup>12</sup> [www.mofept.gov.pk](http://www.mofept.gov.pk)



Admn: Human Resource Management, Finance, Coordination Wing  
 PDP&E: Policy Development, Planning and Evaluation Wing  
 IC: International Coordination and Special Initiatives Wing  
 SD/NFE: Skill Development Wing/ Non Formal Education wing  
 FE: Formal Education Wing  
 NCC/RE: National Curriculum Council/ Religious Affairs

## School Education Department, Government of Punjab<sup>13</sup>

**43. Functions:** The functions performed by the School Education Department are:

### Legislation, Policy Formulation and Planning

The following are the legislation, policy formulation and planning areas of the School Education Department:

- Primary education
- Elementary education
- Secondary and Higher Secondary education

### Maintaining Standards of Education

This maintenance includes:

- Formulating the curricula and syllabi up to class XII.
- Production and publication of text books for class I to XII.

### Monitoring and Evaluation System

This system includes:

- Distribution of free textbooks
- Development schemes
- Presence of teaching and non-teaching staff
- Updation of online-access information
- Redressal of public complaints

<sup>13</sup> [www.schools.punjab.gov.pk](http://www.schools.punjab.gov.pk)

### **Promotion of Quality Education**

Quality education is ensured through:

- Punjab education assessment system
- Student assessment and terminal examination of Grade-V and VIII elementary education through Punjab Examination Commission.
- Grant of scholarships
- Production and distribution of educational and scientific films

### **Staff Development**

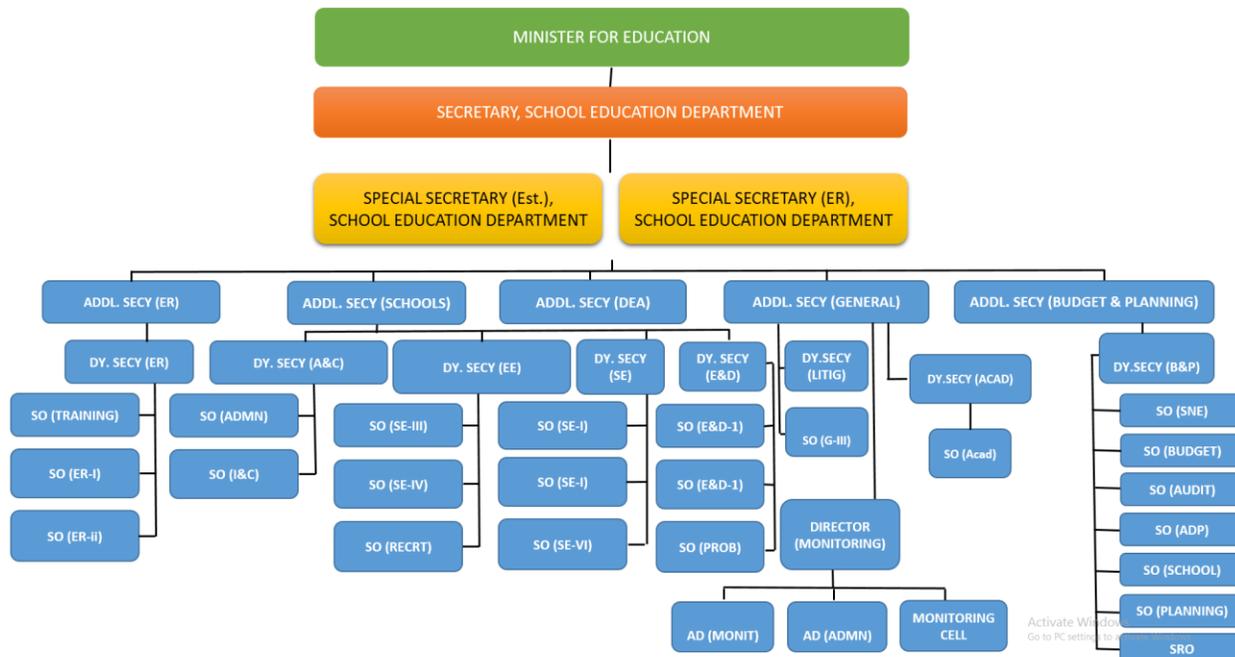
The functions of staff development are:

- Pre-service and in-service teachers training
- Continuous professional development (CPD)

**44. Other Functions:** Other functions performed by the department apart from aforementioned are as follows:

- Regulatory policy concerning private sector schools
- Children libraries and libraries affiliated with Children Library Complex
- Promotion of sports in schools
- Provision of compulsory and free education to all of age 5-16 years
- The matters relating to the Punjab Daanish Schools and Centers of Excellence
- To promote quality education through public-private partnership through Punjab Education Foundation
- The matters relating the Punjab Teachers' Foundation
- Budget, accounts and audit matters
- Purchase of stores and capital goods for the department
- Service matters except those entrusted to Services and General Administration Department

**45. Organogram:** The organogram of the department is as under:



## School Education and Literary Department, Government of Sindh<sup>14</sup>

46. Education is one of the most important pillars of the government through which it enhances technical and professional skills of people so that they can play their due role in the development of country. The Sindh Education and Literary Department was established with the aim of fulfilling the state's responsibility of providing basic education to its people. The government of Sindh stands committed to universalize education under the Sindh Right of Children to Free and Compulsory Education Act, 2013. Under the act, the government's top priority is 'to provide for free and compulsory education to all children of the age of five to sixteen year.

47. **Mission:** Following is the mission of the department:

- Increase equitable access to quality ECE, primary and secondary education to promote social cohesion and to provide greater opportunities for learning, participation and 21st century skills to marginalized groups, particularly girls and women.
- Improve the quality of learning outcomes through strengthening the teaching/learning process through innovations
- Strengthen governance and service delivery by improving the performance capacity at all levels.

48. **Vision:** The vision of the department is as under:

Providing equal opportunity of quality education to all children and the youth of Sindh to realize their full potential and contribute to the development of society and economy creating a sense of nationhood and inculcating values of tolerance, social justice and democracy.

<sup>14</sup> www.sindheducation.gov.pk

## **Elementary and Secondary Education Department, Government of Khyber Pakhtunkhwa<sup>15</sup>**

**49.** Elementary and Secondary Education Department is the biggest of all departments of Khyber Pakhtunkhwa. It has more than 187,733 employees. About 4.381 million students are learning in more than 27,514 Government institutions having more than 142,623 teachers.

**50. Functions:** Following are the functions of the department”

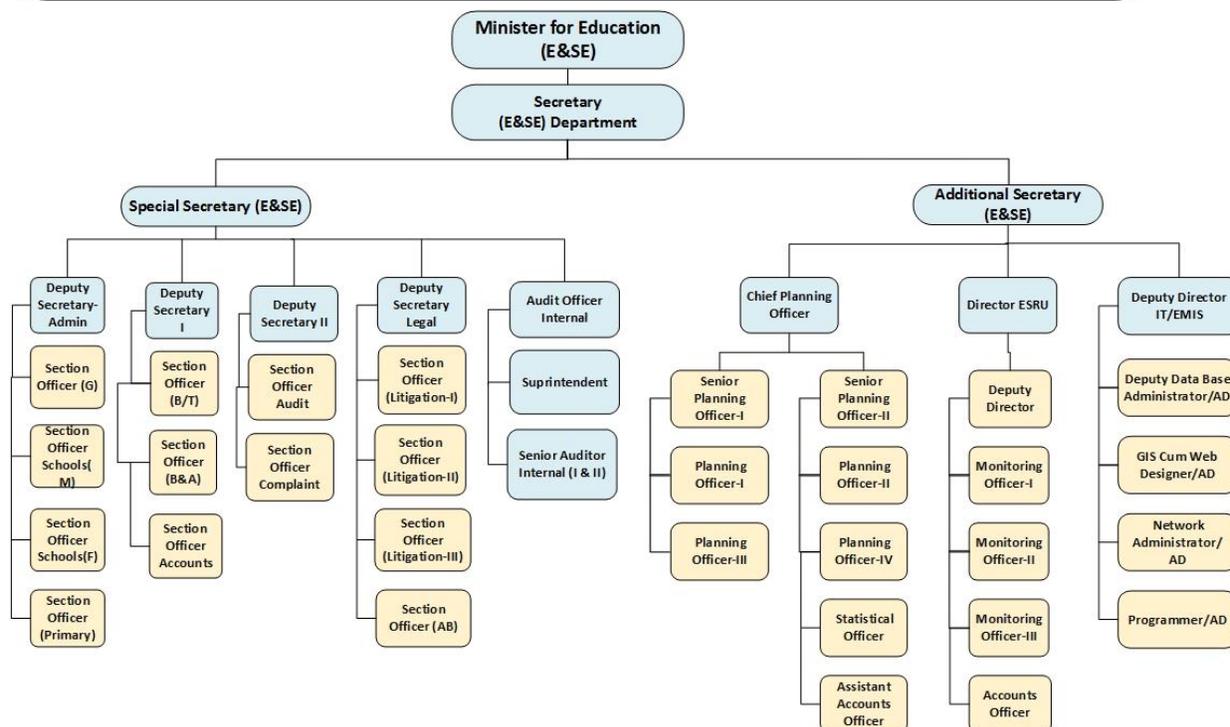
- Formulation of policies, strategies and regulations for Schools Education & Literacy.
- Preparation of Annual Developmental Program (ADP) for Elementary and Secondary Education Sector.
- Processing of developmental projects.
- Monitoring and review of developmental Projects and schemes in coordination with concerned Directorates/PIUs.
- Improvement of Literacy and quality/standard at Primary and secondary education level.
- Financial Management (Recurring/non-recurring Budgets) and auditing of the Provincial Level releases to Schools & Literacy Department including PAC/DAC.
- Education Management Information System and Geographic Information System
- Regulation, Registration and Supervision of Private Teacher Training Institutions through BISEs.
- Preparation of draft Acts/Ordinances as per need for the approval of provincial assembly/ Chief Executive of the Province.
- Attending to the questions/queries of the Provincial/National Assemblies and Senate pertaining to Schools & Literacy sector in the province.
- Dealing the matters of BISEs & Public Schools in Khyber Pakhtunkhwa.
- Inter District posting/transfers of Officers of Provincial cadre (BPS-17 and above) in Schools on recommendations of the Directorates of Elementary and Secondary Education Department
- Processing of Selection grade, Move-over, Pension, GP fund final payment and Promotion cases for approval of the competent forum at Provincial Level in accordance with the existing approved Policy.
- Coordination with the Federal Government and Donors.
- Inter Provincial admissions in teachers training institutes on reciprocal basis.
- Performance evaluation reports of Provincial cadre Officers (ACRs).
- Processing the cases of short and long-term foreign visits/training and award of Scholarships for approval of the competent forum.
- Any other task assigned by the government.

**51. Organogram:** The organogram of the department is as under:

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<sup>15</sup> www.kpese.gov.pk

## Organizational Structure of Elementary & Secondary Education Department Khyber Pakhtunkhwa



### Pakistan Environmental Protection Agency<sup>16</sup>

52. Pakistan Environmental Protection Agency is an attached department of the Ministry of Climate Change and responsible to implement the Pakistan Environmental Protection Act, 1997 in the country. An Act to provide for the protection, conservation, rehabilitation and improvement of environment, for the prevention and control of pollution, and promotion of sustainable development. Pakistan Environmental Protection Agency also provides all kind of technical assistance to the Ministry of Climate Change.

53. Following four Directorates function in the agency:

- Directorate of Admin/Legal/Enforcement
- Directorate of environmental Impact Assessment/Monitoring
- Directorate of lab/NEQS
- National Biosafety Centre (NBC) Directorate

### Environmental Protection Department, Government of Punjab<sup>17</sup>

54. To ensure control, reduction and elimination of pollution in Punjab, a nucleus organization known as Environmental Pollution Control Organization (EPCO) was created in the year 1975 in

<sup>16</sup> [www.mocc.gov.pk](http://www.mocc.gov.pk)

<sup>17</sup> [www.epd.punjab.gov.pk](http://www.epd.punjab.gov.pk)

the Public Health Engineering Department, Punjab. EPCO focused on some areas of the environment but detailed work and follow up was not possible due to its limited scope.

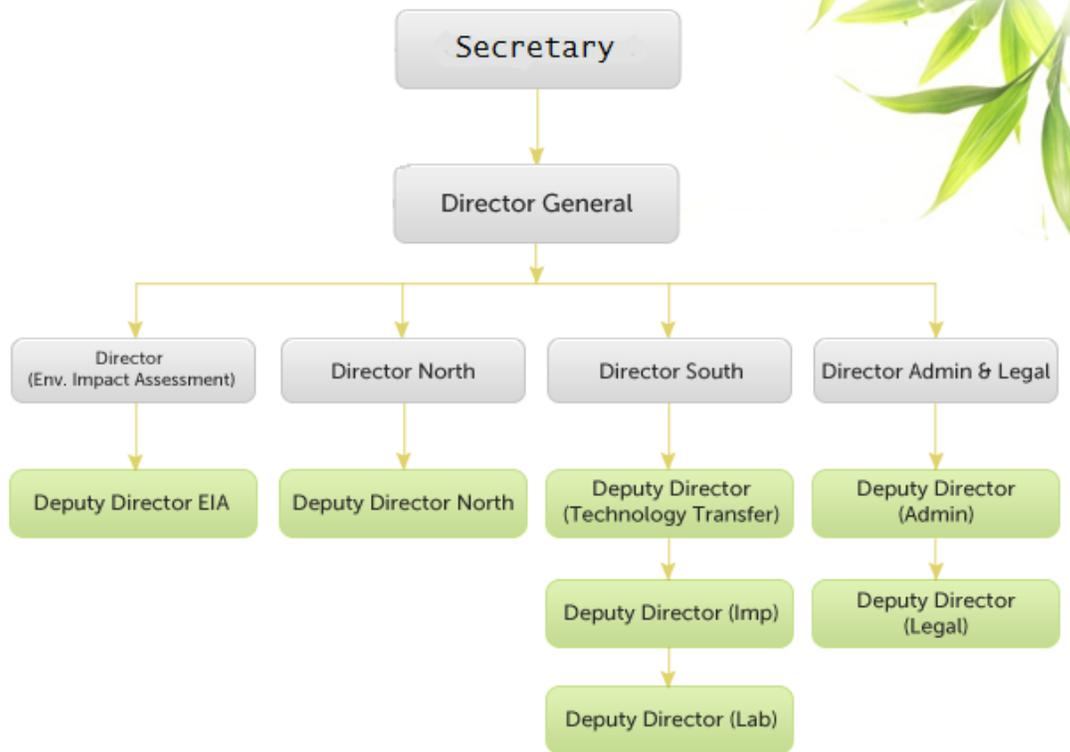
**55.** On December 31, 1983 Under the Pakistan Environmental Protection Ordinance, a provision was made for the establishment of Provincial Environmental Protection Agency. In 1985, the Federal Government was requested to delegate powers of the Agency to the Housing Physical and Environmental Planning (HP&EP) Department. On July 1, 1987, Environmental Protection Agency (EPA), Punjab was formed. Punjab was the first province where an EPA was created in the best interest of citizens. The staff of the existing Directorate of EPCO was transferred to EPA, Punjab under the administrative control of the HP&EP Department. On December 31, 1996, a separate administrative unit, Environment Protection Department (EPD) was formed under the Government of the Punjab. EPA Punjab was then detached from the HP&EP Department and now works as functional unit under the EPD, Punjab.

**56.** On February 11, 1997 the Federal Government withdrew the existing Pakistan Environmental Protection Ordinance (PEPO) of 1983 and declared the Pakistan Environmental Protection Act (PEPA) 1997. The EPA, Punjab now undertakes functions as delegated under this Act.

**57.** The major functions of the Environment Protection Department (EPD) include:

- Administer and implement the provisions of Environment Protection Act and the rules and regulations made there under
- Prepare and establish the Punjab Environmental Quality Standards with approval of the Council and Enforcement
- Take measures to promote research and development of science and technology which may contribute to the prevention of pollution, protection of the environment and sustainable development
- Identify the needs for, and initiate legislation in various sectors of the environment
- Provide information and guidance to the public on environmental matters
- Specify safeguards for the prevention of accidents and disasters which may cause pollution
- Encourage the formation and working of non-government, community and village organizations to prevent and control pollution and promote sustainable development
- Take all necessary measures for protection, conservation, rehabilitation and improvement of the environment, and for prevention and control of pollution
- Promotion of sustainable development

**58. Organogram:** The organogram of EPD, Punjab is presented below:



### Sindh Environmental Protection Agency, Government of Sindh

59. Sindh EPA located at the heart of Korangi Industrial Estate has three cells; Climate Change, Technical and Monitoring Cell, and Legal Cell. Sindh passed Sindh Environmental Protection Act and Sindh Environmental Quality Standards in 2014. Implementation of SEPA 2014 is the mandate of the Sindh Environmental Protection Agency (Sindh EPA). Sindh EPA is headed by a Director General, and sections are headed by directors i.e. Director Technical, Director Administration and Finance, and Director Laboratory. SEPA has established District Environment Offices in a few districts. SEPA informed that it is expanding its operations into 10 districts besides already established Regional offices.

60. Major activity of SEPA is to receive EIA/IEEs from all the new projects and issue NOCs. EIA/IEE is required for the all new projects as per the size of the project. In the case of small infrastructure rehabilitation projects a checklist is applied. If the rehabilitation project is of bigger size then EIA/IEE regulations will be applied. It is the discretion of the Managing Director to decide about the environmental assessment category of the project within the Schedule of Projects part of the SEPA 2014. About 700 EIA/IEEs were submitted to SEPA last year by the new proponents of the projects. SEPA has only two officials for processing these large number of EIA/IEEs.

61. **Organogram:** The organogram of SEPA is as under:



### Environmental Protection Agency, Government of Khyber Pakhtunkhwa<sup>18</sup>

**62.** EPA was established in 1989 under the administration control of Physical Planning and Housing (PP&H) Department. Later on it was transferred to the Planning, Environment & Development (PE&D) Department. In year 2001, it was placed under the newly created Environmental Department. EPA has now one head office at Peshawar while three directorates at Abbottabad, D.I. Khan, and Swabi along with regional office at Gadoon Swabi.

**63. Vision:** The vision of the agency is to provide a healthy and pollution free living environment for the people of Khyber Pakhtunkhwa.

**64. Mission:** The mission of the EPA is to build Khyber Pakhtunkhwa a province where next generations can enjoy a better life than the one that went before it. So where government needs to intervene to ensure that high standards are met, EPA will not hesitate to do so.

### Environmental Protection Agency, Government of Balochistan<sup>19</sup>

**65.** Environmental Protection Agency, Balochistan (BEPA) was created on 22nd February, 1992 and under the administrative control of the Urban Planning & Development Department. Subsequently it was relocated under the administrative control of the Department of Environment, which was abolished and put under the administrative control of Environment, Wildlife Livestock and Tourism Department. At present due to the long consultations and endeavor the Government of Balochistan has notified it as a separate department headed by Secretary Environment and Sports.

**66.** Balochistan Environmental Protection Agency's role is to serve as main environment regulatory body for Balochistan Province, responsible for implementing National and Provincial Laws, and improving the protection of the Environmental and Natural Resources of Balochistan, developing policies for improvement and sustainable use of natural resources.

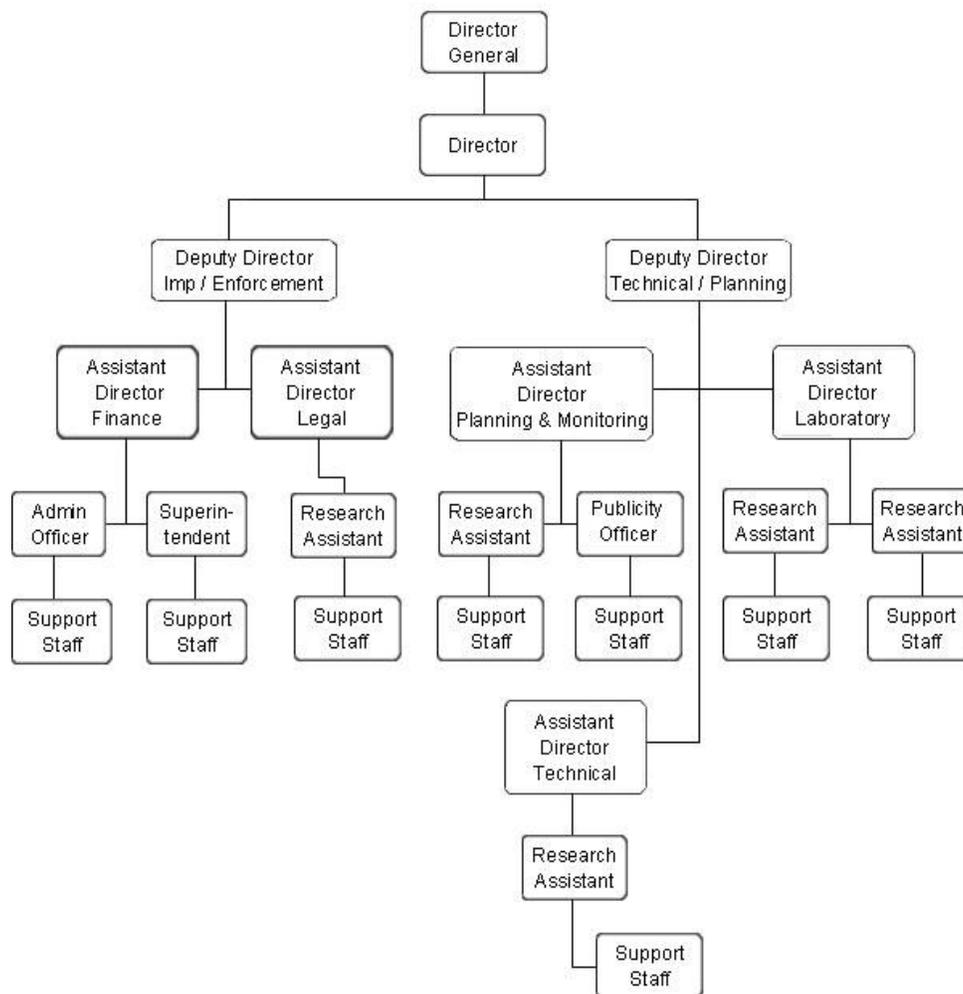
**67. Service and Functions:** Following are the services and functions of the agency:

<sup>18</sup> [www.epakp.gov.pk](http://www.epakp.gov.pk)

<sup>19</sup> [www.balochistan.gov.pk](http://www.balochistan.gov.pk)

- To protect the environment of Balochistan with a view to promote and attain pollution free livelihood of both human and natural resource in accordance with the Environmental Laws and National Environmental Quality Standards (NEQS)/check list /guidelines.
- To implement environmental Laws, regulations and National Environmental Quality Standards.
- To promote environmental awareness and conduct research on environmental issues. To integrate the principle and concerns of environmentally sustainable development into provincial development plans and polices. To enforce environmental Laws, regulations and National Environmental Quality Standards with effect from 1st July, 2000
- To measure and monitor industrial, urban and agriculture pollution discharge in the air, water and soil of Balochistan. To institute Environmental Impact Assessments (EIA)/IEE process for the project formulation by the Government Department /Agencies. To increase the awareness level of policy makers and general public on damage being done to the environment and Natural resources. To build the capacity of Environmental Protection Agency, Balochistan, both in terms of human resource development and infrastructure development. To arrange adoption of Pakistan Environmental Protection Act, 1997 through provincial legislation.

68. **Organogram:** The organogram of the agency is given below:



## **Social Management System**

**69.** Following regulations are applicable for social management under the program:

- Provincial Local Government Acts
- Provincial Right to Information Acts
- Provincial Ombudsman Acts
- Open Government Partnership

## **Provincial Local Government Acts**

**70.** All the four provinces have promulgated following local government acts:

- Punjab Local Government Act 2013
- Sindh Local Government Act 2015
- Khyber Pakhtunkhwa Local Government Act 2013
- Balochistan Local Government Act 2013

**71.** Local government acts include the establishment of Local Government Commission (LGC), headed by the provincial minister of LG and including members from the provincial assembly, bureaucracy, and technocrats. The LGCs perform inspections, social audits, and dispute resolution for councils and submit reports and recommendations to the provincial government.

**72.** Local governments acts authorize the Union, Village, and Neighborhood Councils to constitute panels of councilors to facilitate out-of-court dispute resolutions and also allows a nine member Panchayat (assembly chosen by the local community) in rural areas and Musalehat-e-Anjuman in urban areas, including two women members nominated by the provincial government.

## **Provincial Right to Information Acts**

**73.** All the four provinces have promulgated following right to information acts:

- The Punjab Transparency and Right to Information Act 2013
- The Sindh Transparency and Right to Information Act 2016
- The Khyber Pakhtunkhwa Right to Information Act 2013

**74.** These acts were promulgated to provide for transparency and freedom of information to ensure that citizens have improved access to public information; to make the Government more accountable to citizens; to enforce the fundamental right of access to information in all matters of public importance and to provide for ancillary matters. These laws were promulgated owing to an old demand of different sections of the society, NGOs and the courts of law; above all, due to the following Article of the Constitution (inserted through 18th Amendment in the year 2010):

**75.** *“19A. Right to information – Every citizen shall have the right to have access to information in all matters of public importance subject to regulation and reasonable restrictions imposed by law.”*

## **Provincial Ombudsman Acts**

**76.** The three provinces have promulgated following ombudsman acts:

- The Punjab Office of the Ombudsman Act 1997
- The Establishment of the Office of Ombudsman for the Province of Sindh Act 1991
- The Khyber Pakhtunkhwa Provincial Ombudsman Act 2010

**77.** The provincial Ombudsman has the mandate to protect the rights of the people, ensuring adherence to the rule of law, diagnosing, redressing and rectifying any injustice done to a person through maladministration and suppressing corrupt practices.

**78.** The law empowers the Ombudsman to entertain complaints against any department, commission or office of the Provincial Government or a statutory corporation or other institution established or controlled by the Provincial Government but does not include the High Court and the Courts working under the supervision of High Court and Provincial Assembly and its Secretariat. Under section 9 (1) of the Act the Ombudsman on a complaint of any aggrieved person, on a reference by the Government or the Provincial Assembly or on a motion of Supreme Court or the High Court or on his own motion (suo moto) can undertake any investigation into any allegation of 'maladministration' on the part of any agency or its officers or employees. The Ombudsman, however, has no jurisdiction to investigate or enquire into matters which are (a) sub judice before a court of competent jurisdiction (b) relates to the external relations of Pakistan or connected with defense of Pakistan or Military, Naval and Air Force of Pakistan or the matters covered by the laws relating to these Forces. The Ombudsman also cannot entertain for investigation any complaint by or on behalf of a public servant or functionary concerning any matter relating to the agency in which the public servant has been or is working in respect of any personal grievance or relating to his service therein.

**79.** Ombudsman has the same powers as are vested in a Civil Court under the code of civil procedure for summoning and enforcing the attendance of any person; compelling the production of documents; receiving evidence on affidavits and issuing commission for examination of witnesses. The Ombudsman is vested with the powers to enter and search any premises and inspect any article, books of account and other documents; impound and seal such article. The Ombudsman has the same powers, mutatis mutandis, as the High Court has to punish any person for its contempt.

### **Open Government Partnership**

**80.** The Open Government Partnership is a multilateral initiative that aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. In the spirit of multi-stakeholder collaboration, OGP is overseen by a Steering Committee including representatives of governments and civil society organizations.

**81.** To become a member of OGP, participating countries must endorse a high-level Open Government Declaration, deliver a country action plan developed with public consultation, and commit to independent reporting on their progress going forward.

**82.** The Open Government Partnership formally launched on September 20, 2011, when the 8 founding governments (Brazil, Indonesia, Mexico, Norway, the Philippines, South Africa, the United Kingdom and the United States) endorsed the Open Government Declaration, and announced their country action plans. Since 2011, OGP has welcomed the commitment of 67 additional governments to join the Partnership.

**83.** In total, 75 OGP participating countries have made over 2,500 commitments to make their governments more open and accountable. Pakistan expressed intent to become a member of Open Government Partnership in November 2016 whereby the Finance Minister signed the letter of intent and expressed the commitment to respect the Open Government Principles as articulated in the Open Government Declaration.

### **Environmental and Social Systems and Capacity Assessment**

**84.** This section summarizes the ESSA team's evaluation of the systems and capacity of the institutions to implement the program's environmental and social management system.

**85.** Under national and provincial environmental protection acts, the wastewater and the solid waste discharge is controlled. Under these acts, no person is allowed to discharge or emit any effluent or waste or air pollutant or noise in an amount, concentration or level which is in excess of the specified Environmental Quality Standards (EQS). These EQS provide limits for the wastewater but no limits have been prescribed for the solid waste. However, the environmental authorities mainly focus on the industries for the compliance of environmental law whereas the enforcement for houses, public and commercial buildings and schools are only monitored on complaints.

**86.** Education departments do not have specific standards and guidelines for WASH facilities to ensure treatment and disposal of sewage from school toilets. It is recommended that the MoFEPT, in consultation with provincial education departments, and provincial EPAs should prepare Environment, Health, Safety and Social (EHSS) Guidelines for the Program to ensure that the sewage and solid waste from schools are properly treated and disposed.

**87.** The Review of IEE and EIA Regulations of Federal, KPK and Balochistan do not require filing of IEE or EIA for the construction or expansion of schools. Punjab regulation requires filing of IEE performa for the construction of rural schools only (not the urban schools) under Schedule III. Construction or expansion of new classrooms/WASH facilities do not require IEE performa. Sindh regulation requires filing of IEE for the construction of educational, academic institutions on land less than 10 acres under Schedule I and filing of environmental screening through checklist for rural schools (Secondary and Higher Secondary) under Schedule III. Construction or expansion of new classrooms/WASH facilities do not require IEE/screening checklist.

**88.** There are two provincial laws i.e. The Punjab Occupational Safety and Health Act, 2019 and The Sindh Occupational Health and Safety Act, 2017 in the country which focus on the safety of the construction workers. There is no enforcement of the provincial occupational safety and health laws in the provinces. The inspectors have limited capacity to enforce these laws in the provinces. There are no SOPs established in the education departments to ensure that the construction of schools or its facilities or expansion or renovation of school building will be safe for the workers and will not pose environmental risks to the community.

**89.** It is recommended that the MoFEPT, in consultation with provincial education departments, and provincial EPAs should incorporate Construction SOPs in the proposed EHSS Guidelines to ensure that the construction/expansion or renovation activities at schools are carried out under safe and environmentally controlled manner to protect environment, workers and the community from potential risks.

**90.** Current policy and regulations at both provincial and federal levels, lack specific provisions pertinent to School WASH. Education departments do not have specific standards and guidelines

for WASH facilities and supply of water and drinking water to the schools and enforcement mechanism. WASH facilities are inspected under school inspection system with limited emphasis on uninterrupted supply of water for sanitation, safe drinking water (water quality testing), hygiene products and O&M of the WASH facilities.

**91.** The proposed EHSS Guidelines should also include WASH standards, inventory of WASH facilities, and hygiene products and services, O&M guidelines, sewage and solid waste treatment and disposal guidelines and monitoring and evaluation procedures to ensure WASH sustainability at schools.

**92.** Currently, regulations on e-waste management is lacking in the country. Furthermore, the educational departments do not have any rules/ procedures for the safe handling and disposal of end of life ICT equipment. The e-waste recycling facilities are operating in informal sector and are not regulated under any regulations.

**93.** It is recommended that the Ministry of Federal Education and Professional Training in collaboration with the educational institutions should develop Standard Operating Procedures (SOPs) for the procurement and disposal of e-waste based on current World Bank's Environment, Health and Safety (EHS) Guidelines, based upon general and industry specific examples of Good International Industry Specific Practices (GIIPs). Similar recommendation was made for World Bank financed 'Punjab Public Resource Management Program (PPRMP)'. Both programs can collaborate for the development ICT SOPs.

**94.** There is no system of environmental assessment of the activities and programs executed by the education departments in different provinces. Environmental assessment studies are not carried out to evaluate and manage environmental risks associated with the education activities. There is no department/section in any of the education departments and no person is dedicated for the environmental assessment, studies or the surveys.

**95.** There is no system of social assessment of the activities and programs executed by the education departments in different provinces. Social assessment studies are not carried out to evaluate and manage social risks associated with the education activities. There is no department/section in any of the education departments and no person is dedicated for the social assessment, studies or the surveys.

**96.** At present there is no system at the Elementary and Secondary Education Department, KPK, to undertake free, prior and informed consultations with the Kalash people to determine broad community support for the education projects to be started at Kalash valley.

**97.** It is recommended that the KPK education department should consult Kalash People during design of program activities, disclose program information and get their feedback on these activities. As such, government departments are not required to consult vulnerable groups for their inputs into any interventions that can have perceivable impacts on them.

**98.** It is recommended to conduct social assessment for the Kalash People and the vulnerable groups of disadvantaged areas. These assessment will be useful in engaging these groups in the program activities and get their feedback to make program effective and equitable to every segment of the society.

**99.** It is assessed that there is a spread of Grievance Redress Mechanism in the system of provincial government and departments. There is a need to consolidate the GRM system under

one focal institution. It is proposed that the Program should develop its own GRM system to be developed by the Ministry of Education in collaboration with provincial Education Departments.

**100.** The role of Public Information Officer (PIO), designated by each public body under the Right to Information Act, is central to the implementation of this law. PIOs are the first point of contact between citizens and public bodies. The government and public bodies are required to facilitate PIOs in the proactive disclosure of information as much as possible. This would require a need for significantly reforming and modernizing mechanisms of traditional recordkeeping by public bodies. However, as public records are digitized, public bodies will be able to provide information in a timely fashion. Furthermore, PIOs would be empowered to share information upon request as required by RTI law. The current bureaucratic structure compels PIOs to seek permission from the heads of public bodies, the secretaries, before disclosing information. PIOs should not be bound by such restrictions and if any departmental rule binds them to do so, it should be amended.

**101.** The number of information requests under the law is expected to increase manifold as citizens become aware of this law. Thus, the most important aspect of the law is proactive disclosure. Public bodies should disclose as much information as possible proactively, using digital means. This will greatly reduce the number of information requests and limit the burden on PIOs to respond to such requests.

**102.** It is assessed that most of the implementing departments have a limited human resource capacity, infrastructure, past experience and mandate to safeguard environmental and social development issues.