

INDEPENDENT STATE OF PAPUA NEW GUINEA

NATIONAL DEPARTMENT OF EDUCATION



LEARNING ENHANCEMENT AND ACCESS PROJECT (LEAP)

P505529

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

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Table of Contents

List of Tables	4
List of Figures	4
Abbreviations and Acronyms	5
Executive Summary.....	7
1 Introduction	10
2 Project Description	11
2.1 Project Summary	11
2.2 Project Management Structure and Institutional Arrangements	12
2.3 Summary of Main Project Activities	12
2.4 Project Area and Beneficiaries	17
3 Environmental and Social Policies, Regulations, and Laws	18
3.1 Papua New Guinea Legal Framework.....	18
3.2 National Environmental and Social Assessment and Permitting	20
3.2.1 Relevance to LEAP Activities	20
3.3 World Bank Environmental and Social Standards	20
3.3.1 World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines)	22
3.4 Relevant World Bank ESS and PNG Framework Rapid E&S Gap Analysis	22
4 Environmental and Social Context	30
4.1 Socio-Economic Conditions	30
4.1.1 Communities and Culture	30
4.1.2 Economic	30
4.1.3 Education.....	30
4.1.4 Gender Issues	31
4.2 Physical Environment	31
4.2.1 Biological Environment	31
4.2.2 Solid Waste Management	31
4.2.3 E-waste Management	32
4.2.4 Natural Hazards and Climate Change.....	32
5 Potential Environmental and Social Risk Impacts and Standard Mitigation Measures	33
5.1 Summary of Main Environmental Risks.....	33
5.2 Summary of Main Social Risks	33
5.3 Preliminary Risk Analysis	34
5.4 Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups	45
5.5 Planning and Design Considerations for Avoidance of Environmental and Social Risks and Impacts	45
6 Procedures to Address Environmental and Social Issues.....	46
6.1 Overview of Environmental and Social Risk Management Procedures	46
6.1.1 Sub-component Activity Assessment and Analysis – E&S Screening.....	47
6.1.2 Subproject Formulation and Planning – E&S Planning	48
6.1.3 E&S Implementation and Monitoring	49
6.1.4 E&S Reporting	49
6.1.5 Review and Evaluation – E&S Completion	50
6.2 Technical Assistance Activities	50
7 Implementation Arrangements.....	51
7.1 Proposed Training and Capacity Building	54
7.2 Estimated Budget	55

8	Stakeholder Engagement, Disclosure, and Consultations.....	57
	Annexes.....	58
	ANNEX 1. ENVIRONMENTAL AND SOCIAL RISK SCREENING FORM FOR CIVIL WORKS.....	59
	ANNEX 2. ENVIRONMENTAL AND SOCIAL CODES OF PRACTICE (ESCP)	64
	ANNEX 3. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) TEMPLATE	70
	ANNEX 4. LAND ACCESS PROCEDURE.....	72
	ANNEX 5. CHANCE FINDS PROCEDURES FOR CULTURAL ITEMS AND UXO	84
	ANNEX 6. GENDER BASED VIOLENCE (GBV) ACTION PLAN	86
	ANNEX 7. TERMS OF REFERENCES (TORs) FOR E&S SPECIALISTS.....	97
	ANNEX 8. LABOR MANAGEMENT PROCEDURES	110

List of Tables

Table 1 - Proposed Project Activities	14
Table 2 - Papua New Guinea Relevant Legal Framework	18
Table 3 - Relevant World Bank ESSs.....	21
Table 4 - Rapid Analysis of PNG Laws and NDoE Processes compared to WB ESSs	23
Table 5 – Component 1 Activities E&S Risk Analysis	35
Table 6 – Component 2 Activities E&S Risk Analysis	39
Table 7 – Component 3 Activities E&S Risk Analysis	40
Table 8 –Component 4 Activities E&S Risk Analysis	44
Table 9 - Project Cycle and E&S Management Procedures	46
Table 10 – LEAP Project Exclusion List	47
Table 11 - Implementation Arrangements.....	52
Table 12 - Proposed Training and Capacity Building Approach	54
Table 13 – Estimated ESMF Implementation Budget	55

List of Figures

Figure 1 – Location of the Selected Provinces (Eastern Highlands, Simbu, Morobe, New Ireland, Milne Bay and National Capitol District).....	12
Figure 2 – Examples of rural elementary (pre->grade 2) buildings in Papua New Guinea	31
Figure 3 – LEAP Project Management Unit based in the NDoE	51
Figure 4 – LEAP Provincial Project Offices	51

Abbreviations and Acronyms

ADB	Asian Development Bank
CEPA	Conservation and Environment Protections Authority
DFAT	Department of Foreign Affairs and Trade (Australia)
DoE	Department of Education (PNG)
ECE	Early Childhood Education
E&S	Environmental and Social
EIS	Environmental Impact Statement
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FM	Financial Management
G2	Grade 2
GBV	Gender-based Violence
GEMS	Geo-Enabling Initiative for Monitoring & Supervision
GM	Grievance Mechanism
ICT	Information and Communications Technology
IDA	International Development Association
IEC	Information, Education and Communication
LAP	Land Access Procedures
LEAP	Learning Enhancement and Access Project
LMP	Labor Management Procedures
MFAT	Ministry of Foreign Affairs and Trade (New Zealand)
MPA	Multiphase Programmatic Approach
NARP	National Assessment and Reporting Policy
NGO	Non-Governmental Organisation
NDoE	National Department of Education
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PDoE	Provincial Divisions of Education
PIE	Partnerships for Improving Education
PMU	Project Management Unit
PNG	Independent State of Papua New Guinea
POM	Project Operations Manual
PPO	Provincial Project Office
SEA	Sexual Exploitation and Abuse
SECAP	Stakeholder Engagement and Communication Action Plan
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SPREP	Secretariat for the Pacific Regional Environment Programme

TA	Technical Assistance
UXO	Unexploded Ordnance
VAC	Violence against children
VLD	Voluntary Land Donation
WB	World Bank

Executive Summary

The World Bank (WB) is providing support to the Independent State of Papua New Guinea (PNG) to implement the Learning Enhancement and Access Project (LEAP). The Program's objective is to improve access and quality at early childhood education (ECE) and quality at preparatory-grade 2 levels in project-targeted provinces. The MPA will focus on improving education outcomes through four components: ECE to prepare children for learning; teacher support for effective teaching; modernization of education infrastructure and management; and project oversight through monitoring, evaluation, and capacity-building. It will be implemented by the National Department of Education (NDoE), in coordination with Provincial Divisions of Education and church education agencies over a 12-year phased Multiphase Programmatic Approach starting in 2025.

The first phase of the MPA (the Project) is to be funded by a \$100 million IDA credit and a \$10 million grant from the Government of Australia (\$110 million). Some Project activities will be implemented nationally. While others will be implemented in a select number of provinces based on selection criteria related to education outcomes, capacity, and development partner support among others. For the Project, the NDoE has selected six provinces (Eastern Highlands, Simbu, Morobe, New Ireland, Milne Bay and National Capitol District). Specific locations of subcomponent activities are not yet confirmed. Locations and design will be confirmed during project implementation.

This Environmental and Social Management Framework has been prepared to identify the potential environmental and social risks and impacts of proposed activities and propose mitigation measures to manage these risks and impacts during the Project, consistent with the WB Environmental and Social Standards (ESSs) of the World Bank Environmental and Social Framework and national requirements. It maps out the PNG laws and regulations and the WB ESSs applicable to the Project, and describes the principles, approaches, implementation arrangements, and environmental and social mitigation measures to be followed.

Potential Environmental and Social Risks.

The potential environmental and social risks for Project activities are identified as:

Key Environmental Risks

- i. Water pollution: Uncontrolled runoff from construction sites that could harm water quality and aquatic life.
- ii. Soil and water contamination: Poor handling of waste, including hazardous materials like asbestos, may pollute the environment.
- iii. Air pollution: Dust from construction activities can affect air quality.
- iv. Noise and vibration: Machinery use may cause disturbances.
- v. Unexploded ordnance: Risks of encountering buried explosives in some areas.
- vi. Occupational health and safety: Risks to workers' safety, especially during construction activities.
- vii. E-waste: Incorrect disposal of electronic waste.
- viii. Downstream risks: Future environmental impacts linked to technical assistance activities.

Key Social Risks

- i. Increases in school-related gender-based violence (GBV) and/or sexual exploitation and abuse/sexual harassment (SEA/SH), which are prevalent in the target locations.
- ii. Increases in violence against children (VAC).
- iii. Risks associated with land and land access for education and digital infrastructure.

- iv. Challenges with engaging and ensuring equitable project benefits for diverse marginalized groups and vulnerable social groups (women, poor, people with disabilities, isolated groups).
- v. Social tensions, conflict, theft and civil unrest within or between diverse communities resulting from real or perceived inequities.
- vi. Compliance risks associated with the use of labor.
- vii. Downstream risks: Future social impacts linked to technical assistance activities.

These risks will be managed and mitigated through the application of:

- Exclusion List: Activities that pose high environmental or social risks, or substantial environmental risks will be excluded.
- Environmental and social risk Screening: Early identification of risks for each subproject to plan mitigation measures.
- Environmental and social risk assessment/management instruments: Preparation of site-specific Environmental and Social Management Plans or the application of Environmental and Social Codes of Practice as determined through the screening.
- Land Access Procedures: Consultation and land due diligence and approaches for land access and/or acquisition.
- Stakeholder Engagement Plan: Stakeholder identification, meaningful consultation and information dissemination to ensure inclusive participation and equitable benefits sharing.
- Grievance Mechanism (GM): Accessible GM and feedback mechanism for stakeholders, with a focus on project affected people, to report concerns or incidents and provide feedback.
- Labor Management Procedures: Clear guidelines to protect workers and ensure compliance.
- GBV Prevention and Response Action Plan: Outlines prevention and response measures to manage school based GBV risks.

These measures, along with careful planning and monitoring, will help mitigate the risks and ensure the Project's environmental and social impacts are managed effectively.

Implementation Arrangements

The implementation of the ESMF involves coordinated efforts at national, provincial, and site levels, with clearly defined roles and responsibilities for all stakeholders. The NDoE Project Management Unit (PMU) will oversee project coordination, monitoring, and compliance with World Bank ESSs and PNG requirements. The PMU will appoint an E&S Specialist and a GBV Specialist. To provide further support for service delivery, the Project will embed a Provincial Project Office (PPO) at the target PDoEs. The PPOs will include a Community Engagement and E&S Officer who will undertake screening of project activities for subcomponent 3.3 3 and manage grievances at the Provincial level, and other duties. Schools and Church Education Authorities will provide local support for environmental and social risk management, while contractors will execute civil works in accordance with environmental and social requirements.

Due to limited institutional capacity for managing environmental and social risks, a cascading training approach will be used to build capacity effectively. Training will be delivered at three levels: (1) national-level PMU staff will be trained on environmental and social risk identification, screening processes, monitoring, GMs, and GBV/SEA/SH/VAC prevention; (2) Provincial and church education authority staff will focus on environmental and social risk management, land due diligence and access, stakeholder engagement, GMs, OHS, and chance-find procedures for cultural heritage or UXOs; and (3) site-level local staff, contractors, and community members will learn basic OHS measures, personal protective equipment (PPE) use, GMs, and GBV/SEA/SH/VAC prevention. The total estimated budget for ESMF implementation is \$85,000 per year (excluding salaries).

Monitoring

The PMU and PPO will oversee environmental and social monitoring, with grantees and contractors responsible for implementing mitigation measures outlined in the site-specific ESMPs. Monitoring methods may include regular site visits, use of mobile devices for tracking progress across multiple subproject locations, monthly written reporting from the field, and potential engagement of third-party monitors for additional oversight. The PMU E&S Specialist will ensure all identified risks in the ESMF are addressed and that mitigation plans are effectively implemented. Monitoring will occur as part of regular project supervision, with reporting conducted monthly.

A separate **Stakeholder Engagement Plan** has been prepared for the Project, based the World Bank's ESS 10 on Stakeholder Engagement. The SEP has been disclosed on NDoE's website (<https://www.education.gov.pg/>)

1 Introduction

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank during Phase 1 of the Learning Enhancement and Access Project (LEAP), developed as a three phase Multiphase Programmatic Approach (MPA). Phase 1 of the MPA (the Project) will build on the existing foundations for the early childhood education (ECE) subsector and implement an existing package of interventions for early primary grade literacy being implemented by the Government of Australia-funded Partnerships for Improving Education (PIE) program to four additional provinces, and tackle data, assessment and infrastructure barriers to align the system towards learning. Moreover, the Project will also build capacity and provide opportunities for knowledge generation to lay the foundations for medium- and long-term reform of the system. The National Department of Education (NDoE) will lead the implementation of the Project activities.

This ESMF follows the World Bank Environmental and Social Framework (ESF) as well as the national, and provincial laws and regulations of the Independent State of Papua New Guinea (PNG). The objective of the ESMF is to identify, assess, and mitigate potential negative environmental and social risks and impacts of the Project consistent with the World Bank Environmental and Social Standards (ESSs) and national requirements. More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF. The rationale of using an ESMF instead of project-specific environmental and social assessment and management plans, is that the designs and exact locations of project activities, as well as the type and magnitude of the environmental and social impacts, will not be known until the project is at an advanced stage of implementation.

This ESMF, including Land Access Procedures (LAP, Annex 4), Gender and Gender Based Violence (GBV) Action Plan (Annex 5), and Labour Management Procedures (LMP, Annex 8), should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), Project Operational Manual (POM) (to be developed), and other specific plans that have been or will be prepared for the Project.

2 Project Description

2.1 Project Summary

The Project (2025-2031), \$100 million IDA financing with a \$10 million co-financing from the Government of Australia (\$110 million), aims to improve access and quality at ECE and quality at preparatory-grade 2 levels in project-targeted provinces. This includes broadening access to ECE, improving teacher training programs, and improving management of the system.

The Project comprises the following four components:

- **Component 1 - Preparing children to be ready to learn through ECE.** The component aims to prepare children for school through quality ECE by means of enhancing ECE centers and establishing community playgroups.
- **Component 2 - Supporting teachers to teach effectively.** This component aims to improve teacher quality in four provinces by providing teaching and learning materials, in-service teacher training and ongoing support, and teacher diploma upgrading.
- **Component 3 - Modernizing the infrastructure and management of the education sector.** This component aims to equip the MoE with access to high-quality data, a national learning assessment system, and analytical tools to strengthen administration, ensure equity in resource allocation, and improve decision making. The component will finance improvements in school infrastructure to improve learning and health.
- **Component 4 - Project management, monitoring and evaluation, and capacity-building.** This component will finance project management support, including safeguards oversight, short-term technical assistance, grievance management, financial management, procurement, monitoring & evaluation (M&E), project management and support staff, goods, and operating costs.

Some Project activities will be implemented nationally. While others will be implemented in a select number of provinces based on selection criteria related to education outcomes, capacity, and development partner support among others. The NDoE has selected six provinces (Eastern Highlands, Simbu, Morobe, New Ireland, Milne Bay and National Capitol District) (Figure 1) for components 1, 2 and subcomponent 3.3, taking into account data on: i) provinces' readiness to implement; ii) a needs and impact index; and iii) whether the province has a similar development partner education program.



Figure 1 – Location of the Selected Provinces (Eastern Highlands, Simbu, Morobe, New Ireland, Milne Bay and National Capital District)

The geographical diversity of the selected provinces allows nearby provinces to benefit from a “demonstration effect” and provides a range of contexts to evaluate project interventions.

The Project Appraisal Document (PAD) contains further information on the LEAP project components and, when finalized, will be available on the World Bank LEAP website (to be developed).

2.2 Project Management Structure and Institutional Arrangements

The project will be implemented by the NDoE in coordination with Provincial Divisions of Education (PDOE) at the provincial level and church education agencies and schools at the subnational level. The Secretary for Education and the Senior Management Team of the NDoE will provide oversight of the program’s overall progress, reporting to the Minister of Education and the National Education Board. Detailed implementation arrangements for environmental and social risk management oversight are provided in Section 7.

2.3 Summary of Main Project Activities

Project activities may involve physical works such as targeted infrastructure improvements, grants for upgrading community playgroup sites, co-funding for new playgroup huts, investments in digital infrastructure (e.g., internet and solar power), infrastructure repair grants in six provinces, and larger-scale construction or replacement infrastructure at successful schools. Component 2 is a scaling up of existing Government-of-Australia-funded Partnerships for Improving Education (PIE) program to an additional six provinces.

The project also includes Technical Assistance (TA) activities including provision of teaching and learning materials, training and capacity building, mentoring support, digitizing education data and business processes, and teacher diploma improvements.

The proposed components and project activities which will be assessed and screened for their environmental and social risks are summarized in the following table:

Table 1 - Proposed Project Activities

Component	Subcomponent	Activity Typology	Activity Description
Component 1: Preparing children to be ready to learn through ECE	Subcomponent 1.1: Establishing ECE resource centers	Technical Assistance:	This may include the following: - Establishment of ECE resourcing units within existing elementary in targeted province (approximately 72) - Coaching, teacher training, and mentoring to build local ECE capacity.
	Subcomponent 1.1: Establishing ECE resource centers	Infrastructure Improvements	Targeted ECE center infrastructure improvements to meet health and safety requirements.
	Subcomponent 1.2: Expanding access to informal ECE settings, and parent/caregiver education programs	Technical Assistance:	Provision of technical assistance to establish at least 5 'community playgroups' in each of the 22 provinces to be supported with 'start-up kits', regular facilitator training, and grants to support cost of facilitator.
	Subcomponent 1.2: Expanding access to informal ECE settings, and parent/caregiver education programs	Infrastructure Grants	Small grants for 'community playgroups' to upgrade an existing community physical site, or match modest community raised funds for a playgroup hut.
Component 2: Supporting teachers to teach effectively	Subcomponents 2.1, 2.2, and 2.3	Technical Assistance	Scaling up of the ongoing Government-of-Australia-funded PIE program focused on preparatory-G2 teachers and head teachers in six target provinces. Includes three subcomponents: - provision of teaching and learning materials (subcomponent 2.1). - in-service teacher training and ongoing support (subcomponent 2.2). - teacher diploma upgrading (subcomponent 2.3).
Component 3: Modernizing the infrastructure and the management of the education sector	Subcomponent 3.1: Digitizing education data and business processes	Digital Infrastructure	Project will support 115 secondary school nationally as hubs for their school cluster. This may include purchase, supply and installation of: - Internet networks (e.g. starlink type). 5kW solar systems (solar panels, batteries, and control boards) to power communication infrastructure. - Desk top computers.

Component	Subcomponent	Activity Typology	Activity Description
	Subcomponent 3.1: Digitizing education data and business processes	Technical Assistance	Investments in digital backbone infrastructure.
	Subcomponent 3.2: Investing in the national assessment system	Technical Assistance	Capacity development for implementation of the new National Assessment and Reporting Policy (NARP).
	Subcomponent 3.3: Needs-based investments in physical infrastructure for schools	Technical Assistance	Infrastructure Needs Assessment of target provinces.
	Subcomponent 3.3: Needs-based investments in physical infrastructure for schools	Infrastructure Repair Grants	Infrastructure repair grants to assist schools to meet NDoE National Infrastructure Guidelines for Elementary, Community & Primary Schools 2010 and WaSH in Schools Policy 2024-2028. Schools will be selected based on qualifying criteria. Menu of items for classrooms: • Replacing bush material roof with metal sheets and gutters to assist water collection. • Providing concrete floor and footpaths around the perimeter of the building. • Providing a toilet. • Provision of a suitable water storage tank, base and piping. • Provision of 3.5kW solar system for off-grid power of lights, ceiling fans, laptop/mobile phone charging station. Menu of items for teacher house refurbishments: • Replace rotting roof sheets and/or gutters. • Renew rotting floor timbers or weather board external cladding. • Provide or replace flywire to window areas. • Replace broken glass louvres blades. • Provide and install solar power kit, suitable for limited lighting and power to charge mobile phone. • Repair damaged water storage tank.

Component	Subcomponent	Activity Typology	Activity Description
Component 4: Project management, monitoring & evaluation, and capacity-building	Subcomponent 4.2: Capacity Building	Technical Assistance	Capacity building of NDoE staff through targeted technical assistance, South-South interchanges and study tours to other countries in the region to learn about best practices, and professional development opportunities specific to different areas of specialization such as public administration, public sector management, M&E, business administration, procurement, financial management

2.4 Project Area and Beneficiaries

The Project could reach approximately 2,000 schools with approximately 5,000 teachers (45% female) serving approximately 180,000 preparatory to G-2 students (49% female) which account for 21 percent of the national student enrolment for these grades. The targeted students will benefit from improved infrastructure, materials, school management, and teacher pedagogical practices. A subset of 400 teachers will complete qualification upgrading. Moreover, 115 secondary schools will receive an improved internet connection, hardware and training. Other beneficiaries include ECE facilitators, and ECE playgroups (including four-and-five-year-old children, parents and ECE workers) in the 110 communities across PNG's 22 provinces, who will benefit from outreach services and improved infrastructure. At the national level, 115 secondary schools will receive an improved internet connection, hardware and training, impacting students and teachers across the feeder primary schools and ECE centers. The capacity of NDoE will be enhanced through capacity building measures.

3 Environmental and Social Policies, Regulations, and Laws

3.1 Papua New Guinea Legal Framework

This section presents information on the PNG Environmental and Social Policies, Regulations, and Laws relevant and directly applicable to the environmental and social risks and impacts of subproject activities.

Table 2 - Papua New Guinea Relevant Legal Framework

Law	Description and Relevance to Project Activities
Constitution	The fourth goal of the PNG Constitution is for PNG's natural resources and environment to be conserved and used for the collective benefit of us all and be replenished for the benefit of future generations. The constitution is supported by a legislative and policy framework that ensures that proposed developments assess, reduce and manage any residual social and environmental impacts such that they are as low as practicable. The Constitution provides safeguards for the compulsory acquisition of customary land (s.53 – Protection from unjust deprivation of property [5.e]; s.54 – Special provision in relation to certain lands [b]).
Environment Act 2000 and supporting regulations	The Environment Act 2000 is the primary legislation for environmental management in PNG, and its Environment Regulations encompass a number of processes, and procedures to regulate them. • Provides protection of the environment in accordance with the Fourth National Goal and Directive Principle (National Resources and Environment) of the Constitution. • Identifies Matters of National Importance. • Regulates environmental impacts of development activities to promote sustainable development of the environment and the economic, social and physical well-being of people. • Provides for the protection of the environment from environmental harm, by defining prescribed activities for which an Environmental Impact Statement (EIS) must be prepared and sets out the procedures for undertaking and approving Environmental and Social Impact Assessments (ESIAs). • Develops requirements for robust stakeholder engagement processes through public consultation as part of assessment and in the decision-making process. • Requires the formulation of appropriate environmental and social safeguards as part of the ESIA process. • Requires environmental monitoring of the development (section 31).
Conservation and Environment Protection Act 2014 (CEPA Act)	Establishes the Conservation and Environment Protection Authority (CEPA) as the environmental regulator.
Physical Planning Act 1989	The Act incorporates a comprehensive mechanism for physical planning at national and provincial levels of government and empowers government to plan and regulate physical development. The Act applies to towns, the National Capital District and areas deemed to be physical planning areas of national

Law	Description and Relevance to Project Activities
	interest. Further, it establishes the Office of the Chief Physical Planner to administer the Act.
Organic Law on Provincial Governments and Local-Level Governments 1995	This legislation provides substantial responsibility for law-making powers relating to conservation and sustainable development to provincial and local-level governments.
Building (Amended) Act 2016 and Building Regulation 1994	The PNG Building (Amended) Act 2016 and PNG Building Regulation 1994 are the overarching building standards that specify the minimum requirements in terms of methods, materials, workmanship, procedures, health and safety, etc. for the construction of buildings including these of the schools. Relevant to any construction or renovation of any structures, whether temporary or permanent.
Public Health Act, 1973, the Public Health (Sanitation & General) Regulations, 1973.	This Act protects the public by numerous measures including regulation and control of the unplanned disposal of any environmental contaminants such as domestic or industrial waste and/or refuse that will have some kind of impact on the lives of people. The Act regulates the proper and planned establishment of waste disposal points such as rubbish dumps and landfills so that such establishments are seen to be causing minimal inconvenience to people's lives. The Act also covers the areas of general health, sanitation, cleaning, scavenging and disposal of wastes. It covers all the activities that pose risks and potential risks, and inconveniences by their output to the usage of the environment surrounding the area of activity.
The Land Act 1996 & Land Acquisition for Development Purpose Act 1974	Governs land access and allows for the acquisition of customary land for public purposes or agree with landholders for land use. It provides a mechanism for compensation.
Industrial Safety, Health and Welfare Act of 1961	The main legal framework for occupational health and safety (OHS). Regulates issues such as minimum requirements of floor space, ventilation, natural lighting, providing a room for eating, rest rooms, sanitary facilities, a first aid kit and first aid personnel. It also requires employers to notify of disease or injury as a result of employment and it includes specific provisions for dangerous work. Is generally no longer responsive to the modern labor market. Although the Government prioritized the development of new OHS legislation some years ago, new legislation has not been adopted.
Employment Act 1978 and associated Employment Regulation 1980	Applying to the employment of nationals and non-citizens, this Act covers recruitment, conditions of employment as well as health and safety aspects. It is administered by the Department of Labour and Employment.
Industrial Safety, Health and Welfare Act 1961	This legislation establishes a responsibility for employers to install programs that create awareness about occupational health and safety issues including cleanliness, air emissions and ventilation, working in confined spaces, dangerous work conditions, clothing, chemical hazards and stress.
Industrial Safety, Health and Welfare Regulations 1965	This Regulation establishes standards for lighting, employee amenities, access and first aid facilities within the workplace.
National Cultural Property (Preservation) Act (1965)-	This Act relates to the preservation and protection of objects of cultural or historical importance to PNG, including chance finds of cultural items. It is administered by the National Museum and Art Gallery.

Law	Description and Relevance to Project Activities
Anti-discrimination Law	The Constitution of PNG guarantees all citizens the same rights, privileges, obligations and duties irrespective of race, tribe, place of origin, political opinion, color, creed, religion or sex. PNG's Employment Act only prohibits discrimination of women on account of their sex and requires employers to pay women and men the same wages for the same work. The National Policy on Disability 2015-2025 advocates for the development of new legislation to provide a clear legal framework for protecting the rights of Persons with Disabilities and for the mainstreaming of the rights of Persons with Disabilities in all legislation and policies.

3.2 National Environmental and Social Assessment and Permitting

The key environmental legislation in PNG is the Environment Act 2000 (the Act) and the associated Environment (Prescribed Activities) Regulation 2002 (the Regulations). The Act is administered by Conservation and Environment Protection Authority (CEPA) and covers any activity that 'results or is likely to result in a change in the environment.' The Act and the Regulations require development consent for prescribed activities (Level 2 and Level 3) to be obtained from CEPA. A development consent application must include an environmental assessment that complies with the Regulations requirements.

The Environment Act 2000 has three levels of activity, Level 1, Level 2 (Category A and Category B) and Level 3. Schedule 1 and 2 of the Environment (Prescribed Activities) Regulation 2002 prescribes the activities under each of the Levels. Level 3 covers those activities with the potential of major environmental impact and are projects of national significance or of large scale. Level 1 activities are those that require a minimum amount of environmental protection. Level 2 and Level 3 activities require an Environmental Permit. Level 1 activities only require an Environmental Permit at the request of the Director of Environment.

Level 1 activities, defined as "any other activity" that is not a Level 2 or Level 3 activity, are activities with very low risk of causing environmental harm and do not require an environment permit, although still require a Notification of Intent and supporting documentation (e.g., ESMP or similar).

3.2.1 Relevance to LEAP Activities

The requirement for environmental permits will be determined during Project implementation. The information currently available for the subprojects indicates that small scale construction works are unlikely to constitute a prescribed activity under the Regulations, unless individual activities involve an investment of a capital cost of more than K50 million (sub-Category 14: General. 14.1) (approximately US\$1.3 million) which is considered unlikely.

3.3 World Bank Environmental and Social Standards

The project will follow the World Bank ESSs, as well as the World Bank Group Environmental, Health and Safety Guidelines. Based on these policies, the environmental and social risks of the project were screened by the World Bank at the concept stage and are categorized as 'substantial' overall, with 'moderate' environmental risk and 'substantial' social risk. Future phases are expected to have a similar risk profile. However, the Environmental and Social Risk Classification will be assessed for each individual phase of the MPA.

The environmental risk for the Project is assessed as 'moderate'. Project activities supporting ECE, teacher training, and improvements to digital infrastructure are unlikely to generate direct or downstream

environmental impacts. The project may procure ITC equipment which will require management of end-of-life e-waste. The project may fund improvements to physical educational infrastructure via construction or renovation of school buildings including potentially classrooms, staff housing, ECE centres. The work types and locations are not yet confirmed but works will be small in scale and impacts are likely to be site-specific, predictable, and temporary, without impacts beyond the footprint of the Project.

Social risk is assessed as ‘substantial’. Key social risks associated with project include community health and safety risks – particularly school related GBV risks associated with associated with education providers receiving support for early childhood and primary school interventions; risks associated with land and land access for infrastructure; challenges with engaging and ensuring equitable project benefits for diverse indigenous peoples’ groups and vulnerable social groups (women, poor, disabled, elderly, isolated groups); social tensions, conflict and civil unrest within or between diverse indigenous communities resulting from real or perceived inequities; and labor and working conditions risks for project workers. These risks are expected to be temporary, predictable, and readily managed through design and mitigation measures.

The World Bank’s environmental and social standards applicable to project activities are summarized in Table 3.

Table 3 - Relevant World Bank ESSs

E&S Standard	Relevance
1. Assessment and Management of Environmental and Social Risks and Impacts	ESS1 is relevant for the Project. Project activities are expected to pose moderate environmental and social risks from demolition and civil works that have the potential to generate E&S impacts, as do digital infrastructure investments (e.g. solar power). Screening and site specific environmental and social risk management documents are required to be prepared and/or followed.
2. Labor and Working Conditions	ESS2 is relevant as the Project is expected to involve direct workers, contract workers, primary supply workers, and community workers. There are certain labor risks for project workers including: (i) sexual exploitation, and abuse and sexual harassment (SEA/SH) risks; and (ii) occupational health and safety (OHS) risks. Labor management procedures (LMPs) are included as Annex 8 of this ESMF.
3. Resource Efficiency and Pollution Prevention and Management	ESS3 is relevant to the project. Demolition waste, including potentially hazardous wastes such as asbestos will require management for civil works. Procurement of digital infrastructure equipment may generate waste downstream which requires management. Screening and site specific environmental and social risk management documents are required to be prepared and/or followed.
4. Community Health and Safety	ESS4 is relevant. Key community health and safety risks include school related GBV associated with education providers receiving support for early childhood and primary school interventions – involving interaction with children; SEA/SH risks associated with the project workforce – including small contractor workforces working near children; and general safety risks associated with construction sites at school sites and within communities. A GBV Prevention and Response Action Plan (GBV Action Plan) has been prepared and is included in Annex 6.
5. Land Acquisition, Restrictions on Land Use	ESS5 is relevant to the project. The project may require land for small scale education infrastructure investments. The Project is expected to prioritize the use of freehold or government land which will be accessed through negotiated

E&S Standard	Relevance
and Involuntary Resettlement	settlement (if required). If customary land is required, this will be accessed through voluntary land donation. Land Access Procedures (LAP) have been prepared and are included as Annex 4.
6. Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 is relevant to the project as works have the potential to have minor impacts on biodiversity and the sustainable management of natural resources. Civil works have the potential to impact biodiversity via poor management of sediment controls or hazardous material. The exact locations of the works are still to be determined. Screening and site specific environmental and social risk management documents are required to be prepared and/or followed.
7. Indigenous Peoples	ESS7 is relevant to the project. ESS7 is relevant and the standard applies for this project since ethnic groups (Indigenous Peoples - IPs) possessing the four characteristics listed in para 8 of ESS7 are present in the project area. The elements of an IPP are included in the overall project design and the Project SEP
8. Cultural Heritage	ESS8 is relevant to the project. However, the footprint educational infrastructure is expected to be small. Most infrastructure is flexible in its location, and cultural heritage sites can be avoided, for example, the site-specific screening process. For precaution, contractors will implement the Chance Find Procedures located in Annex 5.
10. Stakeholder Engagement and Information Disclosure	ESS10 is relevant given the need to engage with beneficiaries and stakeholders on development activities that affect their lives. A standalone SEP has been developed for the project and will be updated at each phase of the MPA.

3.3.1 World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines)

The following EHS guidelines¹ are relevant to the Project and were used to guide the development of this ESMF:

- General EHS Guidelines: Environmental (including management air quality, water quality, noise, waste and hazardous materials).
- General EHS Guidelines: Occupational Health and Safety.
- General EHS Guidelines: Community Health and Safety.
- General EHS Guidelines: Construction and Decommissioning.

3.4 Relevant World Bank ESS and PNG Framework Rapid E&S Gap Analysis

A rapid gap analysis between the PNG legal framework and the WB ESS requirements relevant to project activities and risks is provided in Table 4 - Rapid Analysis of PNG Laws and NDOE Processes compared to WB ESSs. The analysis also considers NDOE approaches and capacity for managing these aspects. The analysis identified several differences between the two frameworks and gap filling measures have been identified. Where the national legal framework differs from the WB requirements, the Project is expected to align to whichever is more stringent.

¹ <https://www.ifc.org/en/insights-reports/2000/general-environmental-health-and-safety-guidelines>

Table 4 - Rapid Analysis of PNG Laws and NDoE Processes compared to WB ESSs

Project Specific E&S Risk	PNG Laws and NDoE Processes	WB ESSs	Key Gaps	Gap Filling Measure
Construction impacts	The Environment Act 2000 governs environmental impact assessments and construction activities in PNG, addressing impacts on the environment, animals, conservation areas, and national parks. These regulations ensure that development activities are conducted sustainably and with minimal harm to natural ecosystems. The PNG Building (Amended) Act 2016 and the PNG Building Regulation 1994 set overarching building standards, defining minimum requirements for methods, materials, workmanship, procedures, and health and safety. These standards apply to all construction projects, including the development of school infrastructure. NDoE requires contractors to implement proper waste management plans to minimize health and safety risks. The NDoE monitors construction activities to ensure compliance with regulations and adherence to environmental and safety standards.	The World Bank's ESF addresses construction-related impacts through various ESSs, particularly ESS1, ESS2, ESS3, and ESS4, which collectively ensure that projects mitigate environmental, social, and health risks during construction.	Many of the small-scale civil works will not require environmental impact assessments under PNG laws. The WB ESSs cover a broader scope which includes social aspects such as labor conditions, community health and safety, and impacts on disadvantaged or vulnerable groups. PNG's monitoring and enforcement mechanisms are less rigorous.	ESS1 requirements need to be followed for environmental and social impacts screening and preparation of specific environmental and social risk management instruments that mitigate construction impacts.
E-waste management	The Environment Act 2000 governs waste management, including hazardous waste like e-waste, by requiring environmentally sound disposal practices and prohibiting activities that harm the environment. PNG has been developing specific frameworks for e-waste management	ESS3 emphasizes resource efficiency, pollution prevention, and hazardous waste management.	Challenges like limited infrastructure, funding, and technical expertise hinder comprehensive e-waste management in PNG.	The Project ESCP requires e-waste management and safe disposal processes, including the development of an e-waste management plan and e-waste

Project Specific E&S Risk	PNG Laws and NDoE Processes	WB ESSs	Key Gaps	Gap Filling Measure
	under its National Waste Management Strategy and National ICT Policy, which emphasize recycling, safe disposal, and public awareness about e-waste hazards. The internal processes within the NDoE lack clarity. The procurement team returns obsolete or malfunctioning electronic equipment to the ICT department. However, the ICT department has been unable to provide details regarding their disposal practices.		NDoE e-waste disposal practices lack clarity.	tracking system, during the procurement and before the installation of such equipment.
Labour risks (a) General (b) Minimum Working Age (c) Worker Grievances (d) Occupational Health and Safety (OHS)	(a) DoE is guided by the Employment Act 1978 & Employment regulation 1980. (b) The Employment Act 1978 sets the minimum working age at 16. NDoE is guided by the GoPNG declaration of 16 years as the minimum age for admission to employment or work. (c) There are limited provisions for GMs in labor disputes. There are no stipulations regarding the introduction of GMs in workplaces in PNG's national legislation. NDoE addresses grievances through relevant divisions based on their nature, ensuring resolution within their jurisdiction, while unresolved issues can be escalated to the Ombudsman Commission, Public Solicitor, or other complaints mechanisms. (d) The Industrial Safety, Health, and Welfare Act outlines basic OHS requirements. NDoE ensures that every engaged contractor prepares	ESS2 Labor and Working conditions: (a) ESS2 ensures safe, fair, and non-discriminatory working conditions, prohibits child and forced labor, enforces occupational health and safety standards, and mandates grievance mechanisms and contractor compliance. (b) Prohibits child labor by setting minimum age requirements aligned with national laws and international standards. (c) Promotes fair treatment, safe workplaces, and grievance mechanisms for workers. (d) Requires borrowers to identify hazards, implement safety systems, provide	Papua New Guinea's labor laws lack alignment with ESS2 in areas like child and forced labor, provisions for community workers, OHS standards, non-discrimination, grievance mechanisms, and contractor oversight.	ESS2 requirements will be followed where there are gaps in local legislation, including preparation of the Project LMP (Annex 8) which includes a minimum working age, OHS for community workers, and worker's GM. OHS will be integrated into activity level screenings and instruments.

Project Specific E&S Risk	PNG Laws and NDoE Processes	WB ESSs	Key Gaps	Gap Filling Measure
	and implements OHS plans accordingly as per the requirement of their condition of contract. In schools, the WaSH in School Policy 2024 – 2028 is followed.	training, and ensure healthy working conditions per Good International Industry Practice (GIIP).		
Land access	The Land Act 1996 governs land acquisition and usage in Papua New Guinea. For every project, the NDoE verifies land ownership during appraisal and requires confirmed land titles from the Department of Lands and Physical Planning (DLPP). When establishing schools, the Land Act 1996 and the Lands Acquisition (Development Purposes) Act 1974 guide consultations, fair compensation, and acquisition processes, with the DLPP providing regulatory oversight. Land for schools is typically acquired through voluntary agreements with customary landowners or state land allocations approved by the Land Administration Division.	World Bank ESS5 addresses the protection and management of land, natural resources, and physical and cultural heritage in projects. It ensures that land acquisition and resettlement are conducted in a fair, transparent, and inclusive manner, with compensation and assistance provided to affected people. The standard emphasizes minimizing displacement, restoring livelihoods, and preserving cultural heritage, while complying with national laws and international best practices.	ESS5 mandates livelihood restoration or improvement for displaced people. This is not explicitly addressed in the Land Act 1996. ESS5 emphasizes minimizing displacement. The Land Act 1996 lacks specific guidance on this. ESS5 requires an accessible grievance mechanism. The Land Act 1996 does not mandate one for land acquisition processes.	Land access procedures have been developed to be consistent with ESS5 (Annex 4). Land Due Diligence Reports are to be prepared as necessary. A GM will be established to allow affected people to raise concerns and resolve disputes related to land acquisition, resettlement, and compensation processes in a fair and transparent manner.
Community health and safety	The Environment Act 2000 addresses community impacts indirectly. The NDoE mandates health and safety risk identification and management for all school infrastructure projects. Each project requires a risk management and health and safety plan to guide mitigation measures.	ESS4 protects community health and safety by requiring risk assessments and mitigation measures for infrastructure projects, including safe construction, waste management, and emergency preparedness, while ensuring	At the national level, there is weak enforcement of health and safety standards for community protection.	The Project will integrate community health and safety into activity level screenings and instruments. Grants should assist schools refurbish classrooms to achieve

Project Specific E&S Risk	PNG Laws and NDoE Processes	WB ESSs	Key Gaps	Gap Filling Measure
	The National Infrastructure Guidelines for Elementary, Community and Primary Schools provides a benchmark for minimum standards which includes: • Concrete floor. • Metal roof to support rainwater harvesting. • External walls with windows for natural light and ventilation. • Water supply (tanks/wells/bore holes/town supply). • Solar or wind generator power supply. • Gender separated VIP toilets. • Desks and chairs.	community engagement to address concerns.		the national infrastructure guidelines.
School related GBV, SEA/SH, and VAC	The Family Protection Act 2013 criminalizes GBV. NDoE is guided by the National Public Service Gender Equity and Social Inclusion (GESI) Toolkit, Behaviour Management Policy, NDOE GESI Policy and Schools Guide, and the PNG Teachers' Association Code of Ethics.	The ESSs require projects to implement specific prevention measures, including the development of GBV action plans, risk assessments, and mitigation strategies.	There is limited focus on a comprehensive prevention framework or proactive measures. Existing laws do not mandate project-specific grievance mechanisms for survivors of GBV, nor do they provide clear procedures for reporting and addressing GBV within the context of projects.	A Project GBV Action Plan (Annex 5) has been developed to articulate GBV risks related to planned Project activities and strategies to mitigate and respond to GBV risk. A Project GM will be established and equipped to receive, register, and facilitate the resolution of GBV complaints.

Project Specific E&S Risk	PNG Laws and NDoE Processes	WB ESSs	Key Gaps	Gap Filling Measure
Exclusion of vulnerable and marginalised groups	Limited specific Government protections for vulnerable groups. NDoE is guided by the overarching Convention on the Rights of Persons with Disabilities (CRPD) which PNG is a signatory to, at formulating its workplace policies, plans, strategies and practices to ensure the needs of people with disabilities are considered. NDoE gender and social inclusion policies include: • GESI in Schools Policy 2024-2028 • Inclusive Education Policy 2024-2028	ESS1 and ESS7 emphasize the need to ensure that vulnerable and marginalized groups are not excluded or adversely impacted by development projects. These groups include women, persons with disabilities, and other socially or economically disadvantaged populations.	PNG laws inadequately address vulnerable groups' specific needs.	The Project will: • Develop activity and subproject criteria to ensure equitable benefits for vulnerable and marginalized groups. • Mitigate exclusion risks through design, grants manuals, and adherence to NDoE policy and international best practices. • The SEP includes strategies for engaging vulnerable groups and diverse ethnicities, with inclusive consultations. • The ESMF mandates facility designs to ensure differentiated access for various users.

Project Specific E&S Risk	PNG Laws and NDoE Processes	WB ESSs	Key Gaps	Gap Filling Measure
Public consultation, and project information disclosure	The Environment Act 2000 mandates public hearings for environmental permits. Public consultation is part of the environmental impact assessment process for Level 2B and 3 activities. Disclosure is not required. Where activities fall outside these categories, stakeholder engagement is mostly handled at the project level. NDoE includes stakeholder identification and engagement in school infrastructure projects, creating stakeholder management plans based on the project's nature and development partner expectations.	ESS10 emphasizes continuous stakeholder engagement and consultation throughout the project lifecycle, including disclosure of project documents.	Consultation is only required for Level 2B and Level 3 projects under the Environment Act 2000. Small scale civil works are unlikely to be included in these categories. Public engagement often lacks inclusivity and ongoing dialogue.	A Project SEP has been developed. The SEP emphasizes ongoing and inclusive engagement with all stakeholder groups.
Grievance mechanisms	There is no universal grievance mechanism. Grievances are mostly handled at the project level. NDoE provides a grievance mechanism for school infrastructure projects to address concerns and resolve issues from both affected communities and contractors.	ESS10 requires accessible grievance mechanisms for all stakeholders.	Lack of systematic grievance frameworks. Mostly handled at the project level.	Project and workers GMs with clear procedures will be developed and operationalized.

The main conclusion of this rapid analysis is that PNG laws and NDoE policies are generally consistent with World Bank ESSs, but that the ESSs are more extensive, requiring gap filling in the following specific areas:

1. **Environmental and Social Impact Management:**
 - Environmental and social risk management screening will be undertaken, and instruments will be developed to mitigate construction impacts.
 - E-waste management plans and tracking systems will be developed and implemented prior to equipment installation.
2. **Labor Management:**
 - A LMP has been prepared (Annex 8) covering minimum working age, OHS for community workers, and worker's GM.
 - OHS will be integrated into screening and activity-level instruments.
3. **Land Access and Resettlement:**
 - LAPs have been developed (Annex 4) and Land Due Diligence Reports will be prepared as needed.
 - A GM for land acquisition, resettlement, and compensation will be established to ensure fairness and transparency.
4. **Community Health and Safety:**
 - Community health and safety will be integrated into activity-level screenings and management instruments.
5. **Gender-Based Violence (GBV) Mitigation:**
 - A GBV Action Plan has been developed (Annex 5), outlining risks and strategies for mitigation.
 - A GM will be set up to handle and resolve GBV complaints.
6. **Inclusive Design and Engagement:**
 - The project will ensure equitable benefits for vulnerable and marginalized groups through inclusive design and grants manuals, following NDoE policy and international best practices.
 - The SEP includes strategies for engaging diverse and vulnerable groups.
7. **Grievance Mechanisms:**
 - Project-specific and workers' GMs with clear procedures will be developed and implemented.

4 Environmental and Social Context

4.1 Socio-Economic Conditions

4.1.1 Communities and Culture

PNG, with a population of approximately 10.6 million, is one of the most culturally diverse countries, home to over 1,000 ethnic clans and 800 languages. Its 22 provinces and 87 districts span four regions: Highlands, Islands, Momase, and Southern. The population is predominantly rural, with 86.66% living outside urban areas, and 36% are under the age of 14, reflecting a young and rapidly growing demographic. Despite its cultural richness, PNG faces challenges, including widespread poverty, especially in rural areas, and frequent land disputes that can escalate into localized ethnic conflicts and civil unrest.

The cultural divide by region or area in PNG is traditionally categorized by the Wantok system. It signifies a context that demands cooperation, caring and reciprocal support and a shared attachment to locality and resources. Moreover, it consists of a web of relationships, norms and codes of behavior, or *kastom*, that maintain group security and stability. Wantok and *kastom* are attributes of Melanesian societies that both unite groups of people with a common sense of identity and objectives but also serves to distinguish groups from others.

Tok Pisin and Hiri Motu have developed as common languages. Tok Pisin is mostly used as a business language in the Highlands, Momase, and Islands regions while Hiri Motu is a common and effective business language in the Southern region.

4.1.2 Economic

PNG experienced 5.17% real growth in 2022, driven by increased production and favorable commodity prices, marking a significant recovery from prior economic challenges. Inflation, averaging 5.1% over the past decade, decreased from 5.3% in 2022 to 3.3% in 2023. Despite these gains, PNG faces challenges like foreign exchange shortages and a heavy reliance on volatile commodity exports. Formal sector employment remains limited, with only 10-15% of the working-age population employed in government, private businesses, or state-owned enterprises, two-thirds of which are in the private sector. The government's 2024 budget prioritizes health and education reforms, aiming to enhance service delivery and address skills mismatches to promote job creation and economic diversification.

4.1.3 Education

Over 87% of PNG's population lives in remote rural areas, making infrastructure and service delivery, including education, challenging. Learning poverty is high, with an estimated 70% of ten-year-olds unable to read and understand age-appropriate text, and significant disparities exist across provinces. Poor education outcomes stem from children starting school at inappropriate ages, limited access to ECE, low teaching quality, high absenteeism, and insufficient management of the rapidly growing education sector. Rural schools often lack basic facilities (Figure 2), such as proper classrooms or gender-separated toilets, further limiting access to quality education and affecting overall human capital development.



Figure 2 – Examples of rural elementary (pre->grade 2) buildings in Papua New Guinea

4.1.4 Gender Issues

Gender inequality is a major issue in PNG as indicated by the country's ranking of 161 out of 189 countries on the UNDP's Gender Inequality Index (189 being the worst)². Women throughout PNG have a high risk of community discrimination due to long-standing traditional values and gender roles that limit their ability to fully participate in a wide range of activities, including in education. The proportion of female students falls from around 48% in elementary to 41% in secondary, with wide disparities between provinces. Women also have limited opportunities for economic participation and leadership roles. Less than half of the teaching workforce are women and the share of women in senior and decision-making positions is low. Just 30% of head teachers and only 32% of school board members are women. GBV is a significant issue, with high rates of domestic violence and sexual assault.

4.2 Physical Environment

4.2.1 Biological Environment

PNG is an island with high species biodiversity and belongs to the Indonesia-Malaysia region though it also shares similarities to northern Australia. Approximately 60% of the land area is covered with dense rain forest containing a wide diversity of plants and animals, including 650 species of birds and 100 species of mammals. The country has one of the largest remaining tropical forest areas in the world and is classified as one of 18 megadiverse regions. The rainforests are of global and national significance. In recent years, the country's rapid population growth (average annual growth rate of 3.5%) has imposed greater demands on existing natural resources and now threatens their sustainable use.

4.2.2 Solid Waste Management

PNG has no solid waste management strategy or regulation or law to manage waste in the country. Waste management is regulated under the Public Health Act, 1973 which manages medical waste, and the Environment Act, 2000 which manages hazardous waste. As such, there are often deficiencies in waste

² UNDP. (Undated). Capacity Development: A UNDP Primer

https://www.undp.org/sites/g/files/zskgke326/files/publications/CDG_PrimerReport_final_web.pdf accessed 27/11/2024.

management practices. There are legal provisions that prohibit illegal dumping, including the imposition of fines. Despite this, illegal dumping and burning of waste are common due to the lack of adequate waste disposal facilities in some areas, lack of public awareness and education, inadequate or absent waste collection services in certain areas and insufficient funding for adequate enforcement; and the relatively low level of fines imposed. The existing regulatory framework lacks a single legislative document to provide for effective planning, management, and operation of the solid waste management sector.

The government does not implement formal waste reduction or recycling programs. However, in some of the major centres (like Port Moresby) there are some commercial recyclers. Informal, household, and community recycling is also practiced, including the use of food waste as animal feed; and reuse of materials of perceived value, such as plastics.

4.2.3 E-waste Management

E-waste management in PNG is an emerging area of focus, with significant efforts underway to address the growing challenge. PNG faces issues such as limited infrastructure, lack of awareness, and improper disposal methods, which result in environmental contamination and health risks. Many communities in PNG handle e-waste through burning or burying, leading to the release of toxic chemicals into the air, soil, and water. Additionally, the country lacks reliable e-waste collection systems and recycling facilities. Dumped e-waste can release harmful contaminants into the environment such as lead, cadmium and dioxins³. The PacWastePlus project is implementing community-driven initiatives, such as the campaign "Don't Let Your E-Waste Go to Waste," in areas like Ensisi Valley⁴. These programs promote behavioral change, upcycling, and sustainable reuse of electronic materials. Collaborations between PNG's government agencies and organizations like the Secretariat of the Pacific Regional Environment Programme (SPREP) have formalized actions to improve e-waste management, focusing on both hazardous waste and recycling infrastructure. These efforts aim to not only address immediate environmental and health concerns but also create opportunities for job creation and sustainable practices in the Pacific region. SPREP recently called for tenders to develop PNG's strategy and guidelines for e-waste management⁵.

4.2.4 Natural Hazards and Climate Change

PNG is subject to a range of natural disasters, including volcanic eruptions, earthquakes, landslides, flooding, and occasional cyclonic activity. Coastal areas and small islands face the additional threat of rising sea levels, leading to displacement. Extreme weather events, such as cyclones and droughts, are becoming more frequent and intense due to climate change, severely affecting agriculture and livelihoods.

³ PacWaste, 2015. "PacWaste Country Profile: Papua New Guinea"

⁴ <https://pacwasteplus.org/news/tackling-e-waste-management-in-ensisi-valley-a-behavioural-change-initiative-in-papua-new-guinea/> accessed 27/11/2024

⁵ <https://www.sprep.org/tender/2024pwp279-request-for-tenders-development-of-papua-new-guinea-strategy-and-guidelines-for-electronic-waste-e-waste-management> accessed 27/11/2024

5 Potential Environmental and Social Risk Impacts and Standard Mitigation Measures

5.1 Summary of Main Environmental Risks

The infrastructure work types and locations are not yet confirmed but works will be small in scale and impacts are likely to be site-specific, predictable, and temporary, without impacts beyond the footprint of the Project. The Project's key environmental risks associated with renovation or construction of small-scale education and digital infrastructure are assessed to be:

- i. Water pollution: Uncontrolled runoff from construction sites that could harm water quality and aquatic life.
- ii. Soil and water contamination: Poor handling of waste, including hazardous materials like asbestos, may pollute the environment.
- iii. Air pollution: Dust from construction activities can affect air quality.
- iv. Noise and vibration: Machinery use may cause disturbances.
- v. Unexploded ordnance (UXO): Risks of encountering buried explosives in some areas.
- vi. Occupational health and safety (OHS): Risks to workers' safety, especially during construction activities.
- vii. E-waste: Incorrect disposal of electronic waste from IT equipment.
- viii. Downstream risks: Future environmental impacts linked to technical assistance activities.

However, the nature and magnitude of the above mentioned direct and indirect environmental impacts are considered to be temporary, site specific, predictable, and reversible if the relevant mitigation measures are properly implemented. The potential environmental risks can be mitigated through E&S screening, and preparation and/or implementation of activity specific E&S risk management instruments, such as Environmental and Social Codes of Practice (ESCOPs) and site-specific Environmental and Social Management Plans (ESMPs).

5.2 Summary of Main Social Risks

Key social risks associated with the Project include:

- (i) Increases in school-related GBV and/or SEA/SH, which are prevalent in the target locations.
- (ii) Increases in violence against children (VAC).
- (iii) Risks associated with land and land access for education and digital infrastructure.
- (iv) Challenges with engaging and ensuring equitable project benefits for diverse marginalized groups and vulnerable social groups (women, poor, people with disabilities, isolated groups).
- (v) Social tensions, conflict, theft and civil unrest within or between diverse communities resulting from real or perceived inequities.
- (vi) Compliance risks associated with the use of labor.
- (vii) Downstream risks: Future social impacts linked to technical assistance activities.

These risks are expected to be temporary, predictable, and readily managed through design and mitigation measures. The potential social risks that may occur are expected to be site specific and can be mitigated through E&S screening and the implementation of Project E&S instruments which include LMP (Annex 8), LAP (Annex 4), GBV Action Plan (Annex 6), a Project grievance mechanism (GM), and a stand-alone SEP. The Project will primarily use government owned or leased land, which may require land access agreements, with no expected involuntary resettlement.

5.3 Preliminary Risk Analysis

The following tables provide a preliminary risk analysis of the type of project activities identified for each component, the potential social and environmental impacts that may result from these activities the key mitigation methods for residual impacts, and the environmental and social risk management tools that are required to be developed and/or followed. Where relevant, for example for civil works activities, the risks at each project stage (planning, implementation, post-implementation) are assessed.

Table 5 – Component 1 Activities E&S Risk Analysis

Activity Typology	Significant Potential Risks and Impacts	Key Mitigation Methods	Relevant E&S Tools
Planning and Design Stage			
Technical Assistance (subcomponent 1.1)	Downstream impacts that are contrary to good environmental and social risk management and community well-being, and/or increases risks of school related GBV, SEA/SH, VAC. Outcomes that are contrary to participants' well-being and/or programs have adverse environmental and/or social impacts or exclude disadvantaged and vulnerable groups or households. Social tensions, conflict and civil unrest within or between diverse indigenous communities resulting from real or perceived inequities.	As a minimum, the PMU E&S Specialist to participate in the development of TA Terms of Reference (TORs). TORs for technical studies to reflect key E&S mitigation management and the requirement for meaningful stakeholder and citizen engagement. For technical studies influencing downstream physical investments, include E&S screening and scoping processes into the TOR, to be reviewed by the PMU E&S Specialist. WB E&S specialists to review consultancy TORs to provide a 'No Objection' prior to finalization to ensure consistency with WB ESSs and Good International Industry Practice (GIIP). Provide transparent information on program activities, benefits, and eligibility criteria to communities, through accessible channels, trusted intermediaries, and in relevant ethnic languages. Proactively identify, consult with, and reach out to disadvantaged and vulnerable groups and households (through surveys, consultations, or other means, as appropriate). GM to address concerns regarding distribution of project benefits.	TORs for the technical studies to reflect key E&S mitigation management. SEP GM
Infrastructure Improvements (subcomponent 1.1)	Temporary or permanent land acquisition is required for infrastructure. Site selection, layout and design of facilities does not consider universal access e.g. users with disabilities.	Infrastructure will preferentially be located on land that is confirmed to be freehold or government land, to be confirmed by the PMU E&S Specialist before any physical works are undertaken. If customary land is required, the PMU E&S Specialist will follow the consultation procedures outlined in the Land Access Procedures (LAP) (Annex 4) and prepare LDDR(s) (where required).	LAP (Annex 4) SEP GM

	Social tensions, conflict and civil unrest within or between diverse indigenous communities resulting from real or perceived inequities.	Consider the need for differentiated access for different users of the facilities in the design. Undertake consultation meetings in accordance with the Project SEP to identify potential access issues and appropriate mitigation. GM to address concerns regarding distribution of project benefits.	
Infrastructure Grants (subcomponent 1.2)	Temporary or permanent land acquisition is required for infrastructure. Disputes within community regarding provision of land and resources for small scale infrastructure. Site selection, layout and design of facilities does not consider universal access e.g. users with disabilities. Social tensions, conflict and civil unrest within or between diverse indigenous communities resulting from real or perceived inequities.	Grants manual to be developed. Grants manual to include E&S requirements and robust criteria for inclusion. Infrastructure will preferentially be located on land that is confirmed to be freehold or government land, to be confirmed by the PMU E&S Specialist before any physical works are undertaken. If customary land is required, the PMU E&S Specialist will follow the consultation procedures outlined in the Land Access Procedures (LAP) (Annex 4) and prepare LDDR(s) (where required). Consider the need for differentiated access for different users of the facilities in the design. Undertake consultation meetings in accordance with the Project SEP to identify potential access issues and appropriate mitigation. GM to address concerns regarding distribution of project benefits.	Grants Manual LAP (Annex 4) SEP GM
Implementation Stage			
Infrastructure Improvements (subcomponent 1.1)	Civil Works: Civil works may generate limited adverse environmental and social impacts such as land clearance; consumption of resources including aggregate, water and energy; nuisances from dust, noise, vibration; pollution from erosion and uncontrolled sediment; minor hydrocarbon spills; minor greenhouse gas emissions; and traffic obstruction.	The PMU E&S Specialist will complete the Activity Screening Form (Annex 1), to screen for E&S risks and determine what E&S risk management instrument(s) are to be developed (site-specific ESMP) or followed (ESCAP), to manage the identified risks, once the scope of works are known. If required, the PMU E&S Specialist develops the site-specific ESMP(s) as determined by the screening, prior to	Activity Screening Form (Annex 1) Follow ESCOP(s) (Annex 2) <u>or</u> prepare site-specific ESMP (as

	Wastes including hazardous wastes such as asbestos: Incorrect waste disposal causing negative impacts to soil and groundwater and/or on community or worker health. OHS: Installation activities pose various OHS risks such as working at heights (on roofs), and sprains, strains, cuts, and crush injuries, and potentially exposure to hazardous materials such as asbestos. Community health and safety: Installation activities pose a risk to community members through increased noise, dust, and traffic; community exposure to health issues such as water-borne and vector-borne diseases; incorrect handling and disposal of hazardous materials; emergency events related to natural disaster and climate risks; increased SEA/SH of women or girls by project workers, increased VAC, labor working conditions risks e.g. the use of child labor. Cultural heritage impacts: Damage or encroachment into precious ecological, archaeological, cultural, or historical sites. Unexploded Ordnance (UXO) chance finds.	the commencement of the activities. All site-specific ESMP are to be included in all works tendering documents. For activities requiring ESMP: Contractor(s) ESMP (C-ESMP) to be prepared and submitted to the PMU E&S Specialist for approval before any physical works are undertaken. Construction company to maintain adequate sanitation facilities onsite (e.g. a Portaloo) and submit waste and recycling and worker training records for review by the PMU E&S Specialist, as requested. For activities following ESCOP: Relevant ESCOP provisions to be included in contractor's contract. Labour issues including working conditions, OHS, SEA/SH, addressed in Project's LMP (Annex 8). Implementation of Code of Conduct. Provide separate facilities for female and male workers. Youth under the age of 18 cannot work on the project. The use of forced, child, or conscripted labor on the project is prohibited. The PMU E&S Specialist will refer to the Project's SEP to ensure widespread engagement with communities – including its more vulnerable. The PMU E&S Specialist will prepare activity level Stakeholder Engagement and Communication Action Plan (SECAPs) where relevant. Project GM available, and awareness of it raised, to enable all stakeholders, including members of marginalized groups, to raise project related concerns and grievances. Chance Finds Procedures (CFP) for Cultural Heritage and UXOs in place prior to any physical works commencing (Annex 5).	determined by the screening) C-ESMP (contractor) (if ESMP is required) LMP (Annex 8) SEP. GM CFPs (Annex 5) in place
Infrastructure Grants (subcomponent 1.2)	Very minor civil works that may generate limited adverse environmental impacts such as dust, noise, vibration, solid waste, occupational and/or community health and safety.	Grant manual to be developed. Grant manual to include E&S screening and mitigation requirements. Provincial Project Office (PPO) Community Engagement and E&S Officer(s) to follow the relevant measures	Grants Manual LAP and LDDR SEP

		included in the project design and the SEP prepared for the project. Project GM available, and awareness of it raised, to enable all stakeholders, including members of vulnerable and marginalized groups, to raise project related concerns and grievances. A GBV Action Plan has been developed to assess and outline measures for addressing school related GBV and SEA/SH risks (Annex 6).	GM GBV Action Plan
Technical Assistance (subcomponent 1.2)	Potential risks associated with labor and working conditions including OHS risks. TA outcomes that are contrary to good environmental and social risk management and community well-being, and/or increases risks of SEA/SH, VAC. School related GBV risks associated with the operation of ECEs. OHS and SEA/SH risks to facilitators Community health and safety risks for training beneficiaries.	Labour issues including working conditions, OHS, SEA/SH, addressed in Project's LMP (Annex 8). The PMU E&S Specialist will review the TA outcomes for compliance with the ESMF, project exclusion list (Table 10), PNG law, and consistency with the WB ESSs and GIIP. WB E&S specialists to review consultancy outputs to provide a 'No Objection' prior to finalization to ensure consistency with WB ESSs and GIIP. A GBV Action Plan has been developed to assess and outline measures for addressing school related GBV and SEA/SH risks (Annex 6).	LMP (Annex 8) GBV Action Plan
Post Implementation Stage			
Infrastructure Improvements (subcomponent 1.1)	Land and/or water pollution from inappropriate disposal of demolition debris at end of facilities life.	Disposal is to be to a facility that is permitted for safe waste disposal.	Waste records.
Infrastructure Grants (subcomponent 1.2)	As above but on a much smaller scale	As above	As above

Table 6 – Component 2 Activities E&S Risk Analysis

Activity Typology	Significant Potential Risks and Impacts	Key Mitigation Methods	Relevant Tools E&S
Technical Assistance	Negative reaction to perceived unfairness of teachers' access to training and capacity building activities. Welfare and safety concern for workforce. Increases in school related GBV, SEA/SH. Remote work-related risks.	Follow the relevant measures included in the project design and the SEP prepared for the Project. The NDoE Behavior Management Policy and PNG Teachers' Association Code of Ethics will be socialized during all teacher training. GM to address concerns regarding distribution of project benefits. A GBV Action Plan has been developed to assess and outline measures for addressing school related GBV and SEA/SH risks (Annex 6).	SEP GM GBV Action Plan

Table 7 – Component 3 Activities E&S Risk Analysis

Activity Typology	Significant Potential Risks and Impacts	Key Mitigation Methods	Relevant Tools	E&S
Planning and Design Stage				
Digital Infrastructure (subcomponent 3.1)	Temporary or permanent land acquisition is required for infrastructure. Downstream impacts that are contrary to good environmental and social risk management and community well-being. Management of end-of-life e-waste.	Infrastructure will preferentially be located on land or roofs confirmed to be freehold or government land, to be confirmed with the schools by the PMU E&S Specialist before any physical works are undertaken. E&S to be included in bid documents. The PMU shall plan for end-of-life e-waste management at the time of procurement and shall develop a simple e-waste management plan (E-WMP) that outlines minimization and disposal measures for e-waste. The PMU shall also develop a tracking system for e-waste to measure the amount and type of e-waste produced and disposed of to ensure that the amounts and types are correctly tracked and recorded. E-waste management and safe disposal requirements are to be included in relevant grant manuals and/or contracts.	Bidding documents LAP (Annex 4) E-WMP E-waste tracking	
Technical Assistance: Infrastructure Needs Assessment of Target Provinces (subcomponent 3.3)	Downstream impacts that are contrary to good environmental and social risk management and community well-being, and/or increases risks of school related GBV, SEA/SH, VAC.	As a minimum, the PMU E&S Specialist to participate in the development of TA Terms of Reference (TORs). TORs for technical studies to reflect key E&S mitigation management and the requirement for meaningful stakeholder and citizen engagement. For technical studies influencing downstream physical investments, include E&S screening and scoping processes into the TOR, to be reviewed by the PMU E&S Specialist. WB E&S specialists to review consultancy TORs to provide a 'No Objection' prior to finalization to ensure consistency with WB ESSs and Good International Industry Practice (GIIP).	TORs for the technical studies to reflect key E&S mitigation management.	

Infrastructure Repair Grants (subcomponent 3.3)	Temporary or permanent land acquisition is required for infrastructure. Site selection, layout and design of facilities does not consider universal access e.g. users with disabilities. Social tensions, conflict and civil unrest within or between diverse indigenous communities resulting from real or perceived inequities.	Grants manual to be developed. Grants manual to include E&S requirements. Infrastructure will preferentially be located on land that is confirmed to be freehold or government land, to be confirmed by the PPO Community Engagement and E&S Officer before any physical works are undertaken. If customary land is required, the PPO Community Engagement and E&S Officer will follow the consultation procedures outlined in the Land Access Procedures (LAP) (Annex 4). Consider the need for differentiated access for different users of the facilities in the design. Undertake consultation meetings in accordance with the Project SEP to identify potential access issues and appropriate mitigation. GM to address concerns regarding distribution of project benefits.	Grants Manual LAP (Annex 4) SEP GM
Implementation Stage			
Digital Infrastructure (subcomponent 3.1)	OHS: Installation activities pose various OHS risks such as working at heights (on roofs), and sprains, strains, cuts, and crush injuries etc. Community health and safety: Installation activities pose a risk to community members through increased noise, incorrect handling and disposal of hazardous materials; potential exposure to live electricity wires; emergency events related to natural disaster and climate risks; increased SEA/SH of women or girls by project workers, increased VAC, labor working conditions risks e.g. the use of child labor.	Labour issues including working conditions, OHS, SEA/SH, addressed in Project's LMP (Annex 8). Implementation of Code of Conduct. Provide separate facilities for female and male workers. Youth under the age of 18 cannot work on the Project. The use of forced, child, or conscripted labor on the project is prohibited.	LMP (Annex 8)
Technical Assistance: Infrastructure Needs Assessment of target	Potential risks associated with labor and working conditions including OHS risks.	Labour issues including working conditions, OHS, SEA/SH, addressed in Project's LMP (Annex 8).	LMP (Annex 8)

provinces (subcomponent 3.3)	TA outcomes that are contrary to good environmental and social risk management and community well-being, and/or increases risks of SEA/SH, VAC.	The PPO Community Engagement and E&S Officer will review the TA outcomes for compliance with the ESMF, project exclusion list (Table 10), PNG law, and consistency with the WB ESSs and GIIP. WB E&S specialists to review consultancy outputs to provide a 'No Objection' prior to finalization to ensure consistency with WB ESSs and GIIP.	
Infrastructure Repair Grants (subcomponent 3.3)	Civil Works: Civil works may generate limited adverse environmental and social impacts such as land clearance; consumption of resources including aggregate, water and energy; nuisances from dust, noise, vibration; pollution from erosion and uncontrolled sediment; minor hydrocarbon spills; minor greenhouse gas emissions; and traffic obstruction. Wastes including hazardous wastes such as asbestos: Incorrect waste disposal causing negative impacts to soil and groundwater and/or on community or worker health. OHS: Installation activities pose various OHS risks such as working at heights (on roofs), and sprains, strains, cuts, and crush injuries, and potentially exposure to hazardous materials such as asbestos. Community health and safety: Installation activities pose a risk to community members through increased noise, dust, and traffic; community exposure to health issues such as water-borne and vector-borne diseases; incorrect handling and disposal of hazardous materials; emergency events related to natural disaster and climate risks; increased SEA/SH of women or girls by project workers, increased VAC, labor working conditions risks e.g. the use of child labor.	Grants manual to be developed. Grant manual to include E&S screening and mitigation requirements. The PPO Community Engagement and E&S Officer will complete the Activity Screening Form (Annex 1), to screen for E&S risks and determine what E&S risk management instrument(s) are to be developed (site-specific ESMP) or followed (ESCOP), to manage the identified risks, once the scope of works are known. If required, the PPO Community Engagement and E&S Officer develops the site-specific ESMP(s) as determined by the screening, prior to the commencement of the activities. All site-specific ESMP are to be included in all works tendering documents. For activities requiring ESMP: Contractor(s) ESMP (C-ESMP) to be prepared and submitted to the PPO Community Engagement and E&S Officer for approval before any physical works are undertaken. Construction company to maintain adequate sanitation facilities onsite (e.g. a Portaloos) and submit waste and recycling and worker training records for review by the PPO Community Engagement and E&S Officer, as requested. For activities following ESCOP: Relevant ESCOP provisions to be included in grantees or contractor's contract. Labour issues including working conditions, OHS, SEA/SH, addressed in Project's LMP (Annex 8). Implementation of Code of Conduct. Provide separate facilities for female and	Grants Manual Activity Screening Form (Annex 1) Follow ESCOP(s) (Annex 2) <u>or</u> prepare site-specific ESMP (as determined by the screening) C-ESMP (contractor) (if ESMP is required) LMP (Annex 8) SEP. GM CFPs (Annex 5) in place

	Cultural heritage impacts: Damage or encroachment into precious ecological, archaeological, cultural, or historical sites. Unexploded Ordnance (UXO) chance finds.	male workers. Youth under the age of 18 cannot work on the project. The use of forced, child, or conscripted labor on the project is prohibited. The PPO Community Engagement and E&S Officer will refer to the Project's SEP to ensure widespread engagement with communities – including its more vulnerable. The PPO Community Engagement and E&S Officer will prepare activity level Stakeholder Engagement and Communication Action Plan (SECAPs) where relevant. Project GM available, and awareness of it raised, to enable all stakeholders, including members of marginalized groups, to raise project related concerns and grievances. Chance Finds Procedures (CFP) for Cultural Heritage and UXOs in place prior to any physical works commencing (Annex 5).	
Post Implementation Stage			
Digital Infrastructure (subcomponent 3.1)	Management of end-of-life e-waste. Land and/or water pollution from inappropriate disposal of solar panels and battery storage systems at end of life.	The PMU shall follow the minimization and disposal methods outlined in the E-WMP to be prepared during procurement of such equipment. The PMU E&S Specialist will verify the safe disposal of e-waste. The PMU shall track the type and amount of e-waste produced using the e-waste tracking system developed during procurement of such equipment. Solar Panel disposal will be to a facility permitted to accept such waste for safe disposal, to be verified by the PMU E&S Specialist.	E-Waste tracking Waste records.
Infrastructure Repair Grants (subcomponent 3.3)	Land and/or water pollution from inappropriate disposal of demolition debris at end of facilities life.	Disposal is to be to a facility that is permitted for safe waste disposal.	Waste records.

Table 8 –Component 4 Activities E&S Risk Analysis

Activity Typology	Significant Potential Risks and Impacts	Key Mitigation Methods	Relevant Tools E&S
Technical Assistance	Travel risks for staff travel outside of the country. Negative reaction to perceived unfairness of NDoE staff access to travel and training opportunities.	NDoE health and safety best practices to be followed. GM to address concerns regarding distribution of project benefits.	GM

5.4 Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups

PNG has very high rates of SEA/SH and violence where women and girls are particularly vulnerable during program activities (such as traveling for training or as a facilitator for training). During preparation, a stand-alone SEP was prepared that outlines special engagement efforts to ensure vulnerable groups equal representation in the consultation and decision-making process associated with the project. Furthermore, a GBV Action Plan (Annex 6) has been prepared to assess and outline measures for addressing school-related GBV and SEA/SH risks.

5.5 Planning and Design Considerations for Avoidance of Environmental and Social Risks and Impacts

It is often possible to avoid or minimize some of the potential environmental and social impacts during subproject implementation by taking certain environmental and social aspects into account during the design of a subproject. Measures that will be used in the early stages of subproject planning and design to avoid and minimize environmental and social impacts include: considering alternative sites to avoid use of customary land and displacement impacts; discussion with the project team and design personnel to identify ways to reduce or avoid adverse impacts, inspection for potential hazardous materials during the design phase to avoid disturbing asbestos where possible; and end of life e-waste management planning requirements during procurement. .

6 Procedures to Address Environmental and Social Issues

6.1 Overview of Environmental and Social Risk Management Procedures

The screening processes outlined in this section will be used to screen Project activities for potential E&S risks and identify the E&S risk management tools that need to be prepared and/or followed. The E&S risk management procedures will be implemented through the Project's subproject selection process, as they are defined by the project team(s) and/or during annual work planning.

Table 9 - Project Cycle and E&S Management Procedures

Project Stage	E&S Stage	E&S Management Procedures
a. Assessment and Analysis: Subproject identification	Screening	- During subproject identification, ensure subproject eligibility by first referring to the Exclusion List in Table 10. - For all civil works activities, use the Activity Screening Form in Annex 1 to identify and assess potential environmental and social risks and impacts, and identify the E&S risk management tools that need to be prepared and/or followed. - The screening outcomes should be discussed with the project team and design personnel to identify ways to reduce or avoid adverse impacts. Any adjustments to the design, categorization, or E&S risk management tool(s) can be refined after this step.
b. Formulation and Planning: Planning for subproject activities, including human and budgetary resources and monitoring measures	Planning	- Based on the completed Activity Screening Form adopt and/or prepare the relevant E&S procedures and plans. - For civil works activities requiring site-specific ESMPs to be prepared, submit finals for review and no objection by the World Bank, prior to initiating bidding processes (for subprojects involving bidding processes) and/or launching activities (for subproject activities not subject to bidding). - Ensure that the contents of the site-specific ESMPs, or ECSOPs are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities in accordance with the SEP. - Train staff responsible for implementation and monitoring of E&S plans. - Incorporate relevant E&S procedures and plans into grant agreements and /or contractor bidding documents; train grantees and/ or contractors on relevant E&S procedures and plans. - Determine if procurement is required for the activity. If yes then ESHS provisions must be incorporated into bidding documents, in accordance with the World Bank Procurement Framework
c. Implementation and Monitoring: Implementation support	Implementation	- Ensure implementation of E&S plans through site visits, regular reporting from the field, and other planned monitoring. Record and report all information.

and continuous monitoring for projects		- Ensure Chance Finds Procedures are in place (Annex 5) - Track grievances/beneficiary feedback. - Continue awareness raising and/or training for relevant staff, volunteers, contractors, communities.
d. Review and Evaluation: Qualitative, quantitative, and/or participatory data collection on a sample basis	Completion	- Assess whether E&S plans have been effectively implemented. - Ensure that physical sites are properly restored.

6.1.1 Sub-component Activity Assessment and Analysis – E&S Screening

Feasibility Stage – Screen Activity for Eligibility

It is not expected that the Project will finance the construction of new physical infrastructure or undertake activities in sectors vulnerable to climate change impacts or areas with tangible and intangible cultural heritage. All proposed Project activities must be screened to ensure that they are within the boundaries of the Project's eligible activities and are not considered as activities listed on the Exclusion List (Table 10).

Table 10 – LEAP Project Exclusion List

The following type of activities shall not be eligible for financing under the Project: ▪ Any construction in protected areas or priority areas for biodiversity conservation, as defined in national law; ▪ Activities that cause significant negative impact on sensitive ecosystems / habitats, or cause significant environmental impacts that cannot be mitigated, require complex mitigation measures, or requires the preparation of an Environmental and Social Impact Assessment (ESIA); ▪ Activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats; ▪ Activities that would lead to conversion or degradation of critical forest areas and clearing of forests or forest ecosystems; ▪ Activities that cause exploitation of limited/non-renewable natural resources (such as ground water); ▪ Activities requiring land reclamation or that increases erosion or land slide risks; ▪ Activities affecting protected areas (or buffer zones thereof), other than to rehabilitate areas damaged by previous natural disasters or anthropogenic causes; ▪ Activities that will cause significant negative climate impacts; ▪ Activities that will cause, or have the potential to result in, permanent and/or significant damage to nonreplicable cultural property, irreplaceable cultural relics, historical buildings, and/or archaeological sites; ▪ Activities that have adverse impacts on indigenous persons land, cultural heritage, or cause displacement/resettlement of indigenous persons from their traditional lands; ▪ Activities that do not meet minimum design standards with poor design or construction quality, particularly if located in vulnerable areas; ▪ Investments that may have potential to increase water use conflict between upstream and downstream populations; ▪ Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 14 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development; ▪

- Activities proposed on land with existing ownership disputes or caveats;
- Any activity requiring involuntary land acquisition;
- Activities that cause significant physical and/or significant economic displacements; and
- Activities requiring physical displacement to another location or forced eviction

Detailed Design Stage - Screening for E&S Risks and Impacts

As a second step, the NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) will use the **Activity Screening Form** in Annex 1 to identify and assess relevant environmental and social risks specific to the activities and identify the appropriate mitigation measures. The Activity Screening Form lists the various mitigation measures and plans that may be relevant for the specific activities (such as the Environmental and Social Codes of Practice (ESCP), site-specific Environmental and Social Management Plan (ESMP), LMP, LAP, and/or CFP(s)).

The screening outcomes should be discussed with the project team and design personnel to identify ways to reduce or avoid adverse impacts. Any adjustments to the design, categorization, or E&S risk management tool(s) can be refined after this step.

The PMU E&S Specialist or PPO Community Engagement and E&S Officer will also review the PNG Environment Regulations to identify if the activity is included on the list of prescribed activities.

The project typologies that need to be further screened using the Activity Screening Form (Annex I) during implementation of the Project, include civil works activities in the categories as follows:

- Minor civil works associated with the community playgroup infrastructure grants (subcomponent 1.2)
- Minor civil works associated with installation of digital infrastructure (subcomponent 3.1)
- Infrastructure Grant Investments (subcomponent 3.3)

All other project typologies do not need to be further screened but must follow the mitigations and tools listed in Tables 5-8.

6.1.2 Subproject Formulation and Planning – E&S Planning

Based on the process above and the **Activity Screening Form** (Annex I), The NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF (such as the ESCOP, the LMP, LAP, etc.) or develop relevant site-specific ESMPs, LDDRs etc.

If site-specific ESMPs are necessary, the NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) will prepare these. The contents of the site-specific ESMPs will be shared with relevant stakeholders in an accessible manner, and consultations will be held with the affected communities on the environmental and social risks and mitigation measures. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts could be prepared.

The site-specific ESMPs are to be submitted as final to the World Bank for no objection.

At this stage, staff who will be working on the various subproject activities should be trained in the E&S management plans relevant to the activities they work on. The NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) should provide such training to field staff.

The NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) must also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. E&S requirements are mandatory to include in the Contractor(s) TORs. The NDoE PMU E&S

Specialist or PPO Community Engagement and E&S Officer (component 3.3) shall provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. The NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

The NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) will determine if procurement is required for the activity. If yes then ESHS provisions will be incorporated into bidding documents, in accordance with the World Bank Procurement Framework.

6.1.3 E&S Implementation and Monitoring

During implementation regular monitoring visits are required to ensure the E&S mitigations are implemented. The monitoring process(es) including the actions and ownerships will be outlined in the site-specific ESMP(s). The PMU/PPOs will consider whether mobile devices can be used for monitoring projects with numerous subproject locations. If there are contractors implementing subproject activities, the contractors will be responsible for implementing the mitigation measures in the E&S risk management documents, with the PMU/PPO oversight.

The NDoE PMU E&S Specialist or PDoE Community Engagement and E&S Officer (component 3.3) will ensure that monitoring practices include the E&S risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring.

Use of Geo-Enabling Initiative for Monitoring & Supervision (GEMS)

The GEMS tool offers open-source digital platforms for remote monitoring, needs mapping, and managing data, enabling GoPNG personnel to independently create and oversee the system. Its deployment by PDoEs can support geo-mapped data collection for school refurbishments under subcomponent 3.3 and should fulfill the monitoring and evaluation requirements of all LEAP components.

6.1.4 E&S Reporting

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the local levels will be submitted to the NDoE PMU E&S Specialist at the national level, where they will be aggregated and submitted to the World Bank on a Semi-annual basis.

Six-monthly project progress reports will be provided to the World Bank. The Environmental and Social Monitoring Reports (ESMRs) can be included as an Annex to the project reports, per the requirements outlined in the ESCP.

Throughout the Project implementation stage, the PMU E&S Specialist will continue to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed in Section 7.2.

The PMU E&S Specialist will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

If the PMU becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are injuries or occupational diseases/illness that results in a worker requiring three (3) or more days off work, incidents of forced or child labor, abuses of community members by project workers (including GBV, SEA, or VAC incidents), any injury or incident that results in a member of the community needing medical treatment, violent community protests, or kidnappings. Regular and incident reporting processes will be operationalized as part of the POM.

6.1.5 Review and Evaluation – E&S Completion

Upon completion of Project activities, the NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) will review and evaluate progress and completion of project activities and all required E&S mitigation measures. The NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) will monitor activities regarding site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the site-specific ESMs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The NDoE PMU E&S Specialist or PPO Community Engagement and E&S Officer (component 3.3) will prepare the completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

6.2 Technical Assistance Activities

The PMU E&S Specialist will ensure that the studies (including technical and feasibility studies), institutional strengthening, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with TOR(s) acceptable to the World Bank, that are consistent with the ESSs. They will also ensure that the outputs of such activities comply with the TOR(s).

The PMU E&S Specialist will review the TA outcomes for compliance with the ESMF, project exclusion list (Table 10), PNG law, and consistency with the WB ESSs and GIIP. The WB E&S specialists review the outputs to provide a 'No Objection' prior to finalization.

7 Implementation Arrangements

At the national level, the NDoE will establish the PMU in the Project Management Division under the authority of the Deputy Secretary, Policy and Provincial Support Directorate to coordinate, monitor and provide support to implementing entities. The PMU will provide financial management, procurement, environmental and social management, and M&E services to ensure adequate human resource capacity is available to support implementation of the Project (Figure 3).

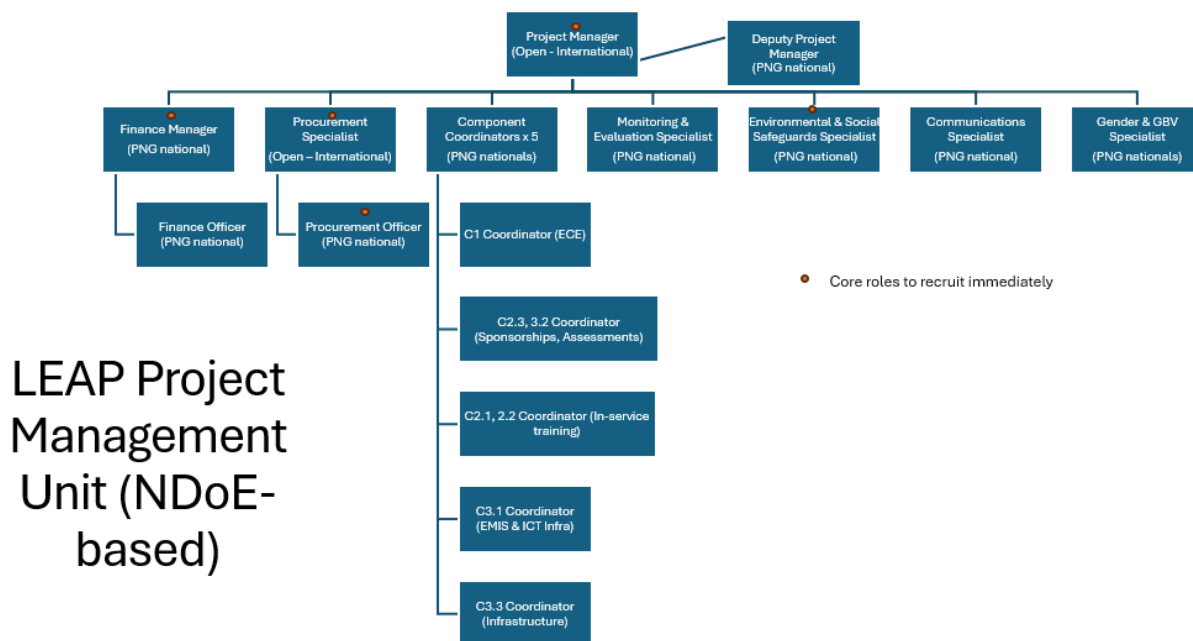


Figure 3 – LEAP Project Management Unit based in the NDoE

To provide further support for service delivery, the Project will embed a Provincial Project Office (PPO) at the target PDoEs (Figure 4). The PPOs will include an E&S Community Engagement and E&S Officer who will undertake screening of project activities for subcomponent 3.3 and manage grievances at the Provincial level.

LEAP Provincial Project Office (6 provinces)

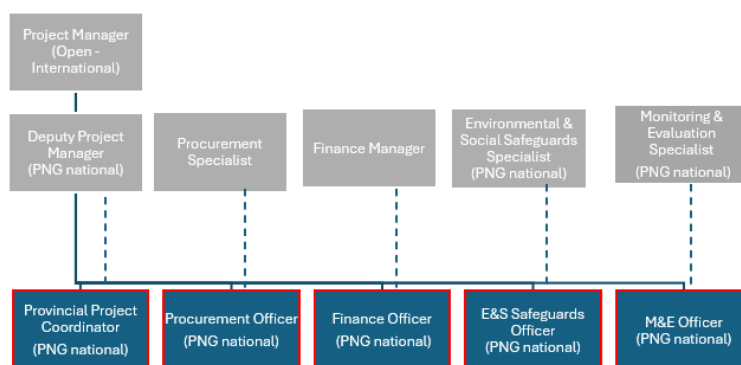


Figure 4 – LEAP Provincial Project Offices

The table below summarizes the roles and responsibilities regarding the implementation arrangements for environmental and social management.

Table 11 - Implementation Arrangements

Level/ Responsible Party	Roles and Responsibilities
Project Steering Committee (PSC)	Oversees the project and supports both at the ministerial level and from private-sector stakeholders; will provide the PMU with high-level guidance as well as a platform for regular information sharing and progress reporting.
NDoE PMU	The PMU will implement the Project in accordance with a POM that details institutional, financial management, disbursement, procurement, environmental and social arrangements, and procedures for day-to-day execution. Specifically, the PMU shall: ▪ Ensure project activities do not fall under the Negative List (Table 10 of the ESMF). ▪ Fill out Screening Checklists for relevant activities (civil works) and submit the forms to the WB. ▪ If relevant, prepare site-specific ESMPs, LDDRs, SECAPs for activities and submit them to the WB for review. ▪ Consult with CEPA to confirm if development consents are required and then prepare the appropriate applications and documents. ▪ Ensure community and stakeholder engagement and disclosure processes to ensure World Bank policy and community expectations are met. ▪ Implement the Project and Workers GM and manage grievances at the National level (level 3). ▪ Train contractors who will be responsible for implementing the site specific ESMP(s), ESCOP(s), etc. ▪ Provide training to contractors and communities on relevant environmental and social mitigation measures, roles, and responsibilities. ▪ Oversee overall implementation and monitoring of environmental and social mitigation and management activities, compile progress reports activities, and report to the World Bank on a six-monthly-annual basis. ▪ If contracting is managed centrally, ensure that all bidding and contract documents include all relevant environmental and social management provisions per screening forms, site-specific ESMPs, and ESCOPs. ▪ Build capacity within the Provincial and Church Education Authorities. ▪ Review and contribute to TA TORs by ensuring consistency with the environmental and social risk management instruments and World Bank ESF. ▪ Manage environmental and social risks in procurement. ▪ May contract higher education institutions to deliver scholarship programs under subcomponent 2.3. ▪ Attend World Bank missions, field trips, meetings etc. as required.
Provincial Departments of Education	The Provincial Departments of Education will provide local support for relevant activities. Specifically, the Provincial Departments of Education shall: ▪ Operationalize component 1.1 activities. ▪ May contract UNICEF, church education agencies, or NGOs to deliver services under Component 1 and subcomponent 2.2. ▪ Provide local information and data to the PMU relevant for completion of the screening checklist(s). ▪ Screen for E&S risks for infrastructure activities under subcomponent 3.3.

	- Assign the Community Engagement and E&S Officer as the focal point for grievance procedures in the provinces (level 2). - Undertake community engagement activities for relevant activities in their provinces. - Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to the national level monthly.
Church Education Agencies	The Church Education Agencies will provide local support for relevant activities. Specifically, the Church Education Authorities shall: - Deliver component 1 ECE activities. - Provide local information and data to the PMU relevant for completion of the screening checklist(s). - Assign the principal as the focal point for grievance procedures at the school level (level 1). - Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to the national level monthly.
Schools	The Church Education Agencies will provide local support for relevant activities. Specifically, the Church Education Authorities shall: - Deliver component 1 ECE activities. - Provide local information and data to the PMU relevant for completion of the screening checklist(s). - Assign the principal as the focal point for grievance procedures at the school level (level 1). - Oversee daily implementation and monitoring of environmental and social mitigation measures, and report progress and performance to the national level monthly.
Contractor(s)	Contractors will be used for civil works activities. Specifically, contractor(s) shall: - Comply with the Project's environmental and social mitigation and management measures as specified in site-specific ESMPs, ESCOPs, and contract documents, as well as national legislation. - Appoint a health and safety officer at site. - Take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities. - Disseminate and create awareness within their workforce of environmental and social risk management compliance. - Provide monthly monitoring reports on environmental and social performance to the PMU.
WB E&S Specialists	- Undertake regular E&S risk management compliance monitoring. - Undertake capacity building. - Attend semi-annual missions.

7.1 Proposed Training and Capacity Building

NDoE has not implemented a WB financed lending operation since 2016. While NDoE has prior experience with the World Bank's safeguards policies, it is likely that this institutional knowledge and capacity has eroded over time. NDoE has no prior experience with implementing the WB's ESF. Therefore, institutional capacity to manage E&S risks is likely to be low. Capacity for managing E&S risks and impacts at the provincial level is also expected to be low.

Successful implementation of the Project will depend, among others, on the effective implementation of the E&S risk management measures outlined in this ESMF. Training and capacity building will be necessary for key stakeholders to ensure effective implementation of the ESMF, LMP, LAP, SEP, grant manuals and activity level E&S instruments.

To the extent possible, training on E&S risk management will be integrated into the project cycle and operational procedures and will be included in the POM (to be prepared). Given the need to raise awareness among project workers and stakeholders at many levels, a cascading model is proposed where information will follow from the national level to the field levels.

A capacity building plan is required to be developed by the PMU E&S specialist as detailed in the ESCP. An initial training approach is outlined in the table below, which will be updated during project implementation as more information about the capacity of key stakeholders and the Project activities is known.

Table 12 - Proposed Training and Capacity Building Approach

Level	Responsible Party	Audience	Topics/Themes that May Be Covered
National level	World Bank	NDoE PMU	E&S Risk Management approach: ▪ Identification and assessment of environmental and social risks. ▪ Activity level environmental and social screening processes and application of relevant environmental and social risk management measures/instruments. ▪ Land Access Procedures ▪ Preparation of site specific environmental and social management plans ▪ Monitoring of Contractors ESMPs ▪ Environmental and social monitoring and reporting. ▪ Incident and accident reporting. ▪ Application of the LMP, including the Code of Conduct, incident reporting, and GBV/SEA/SH/VAC. ▪ Application of SEP and the grievance mechanism, including the processes for handling sensitive complaints such as GBV/SEA/SH/VAC incidents.
Provincial level	NDoE PMU	PDoE PPOs	Environmental and social risk management approach: ▪ Identification and assessment of environmental and social risks. ▪ Selection and application of relevant environmental and social risk management measures. ▪ Land Access Procedures

			- Environmental and social monitoring and reporting. - Monitoring of Contractors ESMPs - Incident and accident reporting. - Application of the LMP, including Code of Conduct, incident reporting, and school related GBV/SEA/SH/VAC. - OHS procedures. - Chance finds procedures for cultural heritage and UXOs. - Application of SEP and the grievance mechanism including the processes for handling sensitive complaints such as GBV/SEA/SH/VAC incidents.
Local/site level	PDoE PPOs	Churches and school's staff Project workers Stakeholders Project participants Contractor(s)	- Application of SEP and the grievance mechanism - Application of the LMP, including Code of Conduct, incident reporting, and school related GBV/SEA/SH/VAC - Monitoring of site works. - Basic OHS measures and use of PPE. - Preparation and application of ESCOPs or site-specific ESMPs, as relevant. - Chance finds procedures for cultural heritage and UXOs. - Cultural heritage chance finds procedures. - Grievance mechanism.
Community level	Local project staff	Communities	- Basic OHS measures and PPE. - Community health and safety issues. - Workers Code of Conduct. - School related GBV/SEA/SH/VAC issues, prevention, measures. - Grievance/beneficiary feedback mechanism.

7.2 Estimated Budget

The following table lists provides an estimate of the cost of items required for the implementation for the E&S risk management procedures, which have been included in the overall project budget:

Table 13 – Estimated ESMF Implementation Budget

Activity/Cost Item	Potential Cost (USD) Per Year
Trainings for PDoE PPO staff in Port Moresby (2 staff x 6 provinces x twice per year)	US\$10,000 per year
Trainings for church and school staff, project workers, project participants in Provinces (venue, travel, refreshments etc.) (6 provinces x twice per year)	US\$5,000 per year
Trainings for contractors in Provinces (venue, travel, refreshments, etc.) (as needed)	US\$5,000 per year
Trainings for communities (as needed)	US\$5,000 per year
Community consultations (as needed)	US\$5,000 per year
Printing of awareness raising materials / grievance materials	US\$5,000 per year

Software for data collection / supervision / monitoring / grievance	US\$10,000 per year
Screening and preparation of site-specific plans including ESMPs, LDDRs, SECAPs, and other site-specific plans (as needed)	US\$15,000 per year
Implementation of site-specific ESMPs, LDDRs, SECAPs, and other site-specific plans	US\$15,000 per year
Travel and accommodation budget for PMU E&S Specialist site visits (6 provinces x twice per year)	US\$5,000 per year
Travel and accommodation budget for PPO Community Engagement and E&S Officers (within provinces x twice per year)	US\$5,000 per year
TOTAL	US\$85,000 per year
PMU E&S Specialist	To be confirmed
PPO Community Engagement and E&S Officers (six provinces)	To be confirmed
Part time E&S consultants (as required)	To be determined during project implementation
TOTAL	To be confirmed

8 Stakeholder Engagement, Disclosure, and Consultations

A separate SEP has been prepared for the Project, based on the World Bank's ESS 10 on Stakeholder Engagement. The SEP has been disclosed on NDoE's website (<https://www.education.gov.pg/>).

This ESMF, which includes the LAP, GBV Action Plan, and LMP as annexes, as well as the ESCP that have been prepared for this project, have also been disclosed on the NDoE's website (<https://www.education.gov.pg/>) on 17 January 2025. Key feedback, if any, on the disclosed ESMF will be included in the Project documents.

Annexes

ANNEX 1. ENVIRONMENTAL AND SOCIAL RISK SCREENING FORM FOR CIVIL WORKS

The Project's environmental and social risk screening procedure for civil works comprises a two-stage process:

1. Initial screening by using the Exclusion List in Table 10 of the Project ESMF; and
2. Screening of the proposed activities to identify the site specific environmental and social risk management approach.

This screening form is to be used for the second stage of screening process as outlined in section 6.1.1 of the Project ESMF and is to be used for Project activities that need to be further screened for environmental and social impacts. The Project activities needing further screening using this form include all civil works activities in the categories as follows:

- Minor civil works associated with the Early Childhood Education Centres.
- Minor civil works associated with installation of digital infrastructure.
- Infrastructure investments.

The completed forms must be signed and kept in the Project's Environmental and Social file. The World Bank may review a sample of the forms during implementation support visits.

1. Sub-Component Activity Information:

Activity Title:	
Project Subcomponent:	
Activity Location:	
Agency in Charge:	
Proposed Start and Completion Dates:	
Number of Potential Beneficiaries:	
Brief Description of the Activity:	

2. Environmental and Social Screening:

Questions	Answer		Next Steps
	Yes	No	
ESS1 - Assessment and Management of Environmental and Social Risks and Impacts			
1. Is the activity on the ‘Ineligible Activities’ list in Table 10 of the ESMF?			If “Yes”: Exclude from project funding.
2. Does the activity involve new construction or significant expansion of the footprint of an existing structure such as school buildings, teacher housing, or roads (including access roads)?			If “Yes”, Moderate Risk: 1. Prepare a site-specific ESMP for the proposed activity based on the template in Annex 3 of the ESMF. 2. Include relevant environmental and social risk management measures into contractor(s) bidding documents. 3. Contractor must prepare and follow Contractors-ESMP (C-ESMP)
3. Will civil works require new borrow pits and/or quarries to be opened?			If “Yes”, Moderate Risk: 1. Prepare a site-specific ESMP for the proposed activity based on the template in Annex 3 of the ESMF.

4. Does the activity involve small-scale civil works such as the construction, renovation, or rehabilitation of small-scale infrastructure such as toilet blocks, small bush or village classrooms, latrines, showers or washing facilities, or shelters?			If “Yes”, Low Risk: 1. Apply relevant measures based on the ESCOPs in Annex 2 of the ESMF (unless one of the questions below raises specific environmental or social risks and requires a site-specific ESMP). 2. Include relevant environmental and social risk management measures from the relevant ESCOPs into the contractor(s) bidding documents.
5. Does the activity lead to any risks to, and/or impacts on, disadvantaged or vulnerable individuals or groups? ⁶			If “Yes”: Apply relevant measures described in the ESMF and SEP.
ESS2 - Labor and Working Conditions			
6. Does the activity involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If “Yes”: Exclude from project.
7. Does the activity involve recruitment of a workforce including direct, contracted, primary supply, and/or community workers?			If “Yes”: Apply LMP (Annex 8 of the ESMF).
8. Will the workers be exposed to any workplace hazards that needs to be managed in accordance with local regulations and guidelines? Do workers need personal protective equipment relative to the potential risks and hazards associated with their work?			If “Yes”: Apply LMP (Annex 8 of the ESMF).
9. Is there a risk that women may be underpaid when compared to men when working on the activity construction?			If “Yes”: Apply LMP (Annex 8 of the ESMF).
ESS3 - Resource Efficiency and Pollution Prevention and Management			
10. Is the activity likely to generate significant quantities of solid waste (e.g., trash), liquid waste (e.g., sewerage) that could adversely impact soils, plants, rivers, streams or groundwater, or nearby communities?			If “Yes”: Moderate Risk. 1. Prepare a site-specific ESMP based on the template in Annex 3 of the ESMF. 2. Include relevant environmental and social risk management measures in contractor(s) bidding documents.
11. Are works likely to cause significant pollution to air and / or water?			If “Yes”: Moderate Risk. 1. Prepare a site-specific ESMP based on the template in Annex 3 of the ESMF. 2. Include relevant environmental and social risk management measures in contractor(s) bidding documents.
12. Will the activity require a large amount of energy (electricity, fuel), water, or other natural resources during project construction or operation?			If “Yes”: Moderate Risk. 1. Prepare a site-specific ESMP based on the template in Annex 3 of the ESMF. 2. Include relevant environmental and social risk management measures in contractor(s) bidding documents.
13. Will construction be located in or adjacent to any waterways (rivers, streams), wetlands (bogs), or water bodies (ponds, lakes, estuary, ocean)?			If “Yes”: Moderate Risk. 1. Prepare a site-specific ESMP based on the template in Annex 3 of the ESMF.

⁶ “Disadvantaged or vulnerable” refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits.

			2. Include relevant environmental and social risk management measures in contractor(s) bidding documents.
14. Will the activity require any land reclamation?			If “Yes”: Exclude from project.
15. Do any of the construction works involve the removal of asbestos or other hazardous materials or wastes? Has an inspection been completed of any buildings to be upgraded or demolished to identify potential asbestos containing materials?			If “Yes”: Apply asbestos guidance provide in the ESCOP (Annex 2 of the ESMF) If no, inspection is required as part of screening
ESS4 – Community Health and Safety			
16. Is there a risk of increased community exposure to communicable diseases (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If “Yes”: Apply LMP (Annex 8 of the ESMF) and relevant measures in the SEP.
17. Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)			If “Yes”: Apply LMP (Annex 8 of the ESMF.).
18. Is there a risk that school related gender-based violence (GBV), sexual exploitation or abuse or sexual harassment (SEA/SH), or violence against children (VAC) may increase as a result of civil works?			If “Yes”: Apply LMP (Annex 8 of the ESMF). Refer to GBV Action Plan in Annex 6 of the ESMF.
19. Is there a risk of unexploded ordnances (UXOs) being present in the footprint of the works?			If “Yes”: Apply requirements for site clearance in ESCoP/site-specific ESMP. Apply Chance Find Procedures in Annex 5 of the ESMF.
20. Would any public facilities, such as schools, health clinics, or churches be negatively affected by civil works?			If “Yes”: Apply relevant measures based on the ESCOPs in Annex 2 of the ESMF (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
21. Will the activity require the government to retain security workers to safeguard the activity?			If “Yes”: Prepare a site-specific ESMP for the proposed activity, including an assessment of potential risks and mitigation measures of using security personnel.
ESS5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
22. Will the activity or any associated facilities needed for the activity require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)?			If “Yes”: Exclude from project.
23. Has the site of the activity been acquired through eminent domain in the past 5 years, in anticipation of the activity?			If “Yes”: Exclude from project.
24. Will the activity lead to temporary or permanent physical displacement or forced eviction (including people without legal claims to land)?			If “Yes”: Exclude from project.
25. Will the activity lead to significant economic displacement that cannot be avoided (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?			If “Yes”: Exclude from project.
26. Is customary land required for the activity being voluntarily donated to the project?			If “Yes”: Follow the Voluntary Land Donation protocol in the project LAP (Annex 4 of the ESMF).

27. Are any potential impacts on access restriction to or delivery of essential services (e.g., hospital, school, church, roads etc.) anticipated?			If “Yes”: Refer to and apply the project LAP (Annex 4 of the ESMF).
ESS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources			
28. Does the activity involve activities that have potential to cause any significant loss or degradation of critical natural habitats (conservation reserves, marine protected areas etc.) whether directly or indirectly, or which would lead to adverse impacts on natural habitats?			If “Yes”: Exclude from project.
29. Will this activity require any clearance of mangroves?			If “Yes”: Exclude from project.
30. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of plants and/or animals)?			If “Yes”: Exclude from project.
31. Will the activity involve the conversion or degradation of non-critical natural habitats?			If “Yes”: Moderate Risk. 1. Prepare a site-specific ESMP based on the template in Annex 3 of the ESMF. 2. Include environmental and social risk management measures in contractor(s) bidding documents.
32. Will this activity require clearance of trees and/or other vegetation?			If “Yes”: Moderate Risk. 1. Exclude from the project if more than 0.5 hectares of tree and vegetation cutting is expected. 2. If less than 0.5 hectares of tree and vegetation cutting is expected, prepare a site-specific ESMP for the proposed sub-component activity, based on the template in Annex 3 of the ESMF. 2. Include environmental and social risk management measures in contractor(s) bidding documents.
ESS8 – Cultural Heritage			
33. Is the activity to be located adjacent to a historical, archaeological, or culturally significant site or facility?			If “Yes”: Prepare a site-specific ESMP based on the template in Annex 3 of the ESMF. Include requirements for clear demarcation of significant sites. Apply Chance Find Procedures in Annex 6 of the ESMF.
34. Is the activity located near buildings, trees, or objects having spiritual values to local communities (memorials, graves or gravestones) or require excavation near there?			If “Yes”: Prepare a site-specific ESMP based on the template in Annex 3 of the ESMF. Apply requirements for clear demarcation of significant sites. Apply Chance Find Procedures in Annex 5 of the ESMF.

3. Consultations

If consultations were undertaken, attach records of consultations including names and genders of person(s) met with during the site visit and the date of site visit:

4. Site and Location Photographs

Please attach any relevant photographs of the site visit and surrounding areas:

5. Map

Please attach a map(s) of the site and surrounding areas:

6. Conclusion

Based on the result from the screening above, please list the environmental and social risk management instruments to be prepared / adopted and implemented:

a)

b)

Note: Before developing the required environmental and social risk management instruments, discuss the screening outcomes with the project team and design personnel to identify ways to reduce and/or avoid adverse impacts (refer to **a. Assessment and Analysis** in Section 6.1 of the Project ESMF).

Name of person who conducted screening: _____

Title of person who conducted screening: _____

Date of screening: _____

Note: The completed screening form must be signed and kept in the Project environmental and social file and included in the reports to be submitted to World Bank per the schedule as agreed with the World Bank in the Project's Environmental and Social Commitment Plan (ESCP).

ANNEX 2. ENVIRONMENTAL AND SOCIAL CODES OF PRACTICE (ESCOP)

Overview

Minor civil works assessed to be 'Low Risk' using the Civil Works Screening Form (Annex 1 of the ESMF) with associated risks that are local, predictable, temporary, and manageable must comply with the relevant sections of this Environmental and Social Code of Practice (ECSOP), and the relevant ESCOP provisions are to be included in contractor(s) contract.

The key impacts and risks identified in tables 5 and 7 of the ESMF are included in the ESCOPs.

This ESCOP should be read in conjunction with the following Project E&S instruments:

- Environmental and Social Management Framework (ESMF) containing Land Access Procedures (LAP, Annex 4) Gender Based Violence (GBV) Action Plan (Annex 6), and Labor Management Procedures (Annex 8)
- Stakeholder Engagement Plan (SEP)
- Project Operational Manual (POM) (to be developed)

Monitoring and Compliance

The ESCOP will be followed by the grantee and/or contractor(s) and compliance will be monitored by the PMU E&S Specialist or PPO Community Engagement and E&S Officer(s) (subcomponent 3.3.).

Reporting

Six-monthly reports will be prepared by the PMU throughout implementation and submitted to the World Bank. The semi-annual environmental and social monitoring reports to the World Bank will include: (i) the status of the implementation of mitigation measures; and (ii) the findings of monitoring programs (iii) stakeholder engagement activities (iv) grievances log (v) E&S performance of contractors and subcontractors (vi) any incidents/accidents with adverse impacts and the actions taken to address it and prevent reoccurrence.

During the construction stages, monthly reports shall be prepared by the contractor(s) and submitted to the PMU for review. The reports will include information on (i) Contractor's compliance with E&S conditions of contract (ii) any health and safety or environmental incidents (iii) information on any grievances received and how they were resolved.

General ESCOP for Infrastructure Subprojects

Issue	Environmental Prevention/Mitigation Measures	Responsible Party
1. Noise during construction	a) Plan activities in consultation with communities, schools, health clinics, or churches, so that noisiest activities are undertaken during periods that will result in least disturbance. (Planning phase) b) Use when needed and feasible noise-control methods such as fences, barriers or deflectors (such as muffling devices for combustion engines or planting of fast-growing trees). (Implementation phase) c) Minimize project transportation through community areas. Maintain a buffer zone (such as open spaces, row of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. (Implementation phase)	
2. Soil erosion	a) Schedule construction during dry season. (Planning phase) b) Contour and minimize length and steepness of slopes. (Implementation phase) c) Use mulch, grasses or compacted soil to stabilize exposed areas. (Implementation phase) d) Cover with topsoil and re-vegetate (plant grass, fast-growing plants/bushes/trees) construction areas quickly once work is completed. (Post-Implementation phase) e) Design channels and ditches for post-construction flows and line steep channels/slopes (e.g., with palm frowns, jute mats, etc.). (Post-Implementation phase)	
3. Air quality	a) Minimize dust from exposed work sites by applying water on the ground regularly during dry season. (Implementation phase) b) Avoid burn site clearance debris (trees, undergrowth) or construction waste materials. (Implementation phase) c) Keep stockpile of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals. (Implementation phase) d) Reduce the operation hours of generators /machines /equipment /vehicles. (Implementation phase) e) Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized. (Implementation phase)	
4. Water quality and availability	a) Activities should not affect the availability of water for drinking and hygienic purposes. (Implementation phase) b) No soiled materials, solid wastes, toxic or hazardous materials should be stored in, poured into or thrown into water bodies for dilution or disposal. (Implementation phase) c) Avoid the use of wastewater pools particularly without impermeable liners. d) Provision of toilets with temporary septic tank. (Implementation phase) e) The flow of natural waters should not be obstructed or diverted to another direction, which may lead to drying up of riverbeds or flooding of settlements. (Implementation phase)	

	f) Separate concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. (Implementation phase)	
5. Solid and hazardous waste	a) Segregate construction waste as recyclable, hazardous and non-hazardous waste. (Implementation phase) b) Collect, store and transport construction waste to appropriately designated/ controlled dump sites. (Implementation phase) c) On-site storage of wastes prior to final disposal (including earth dug for foundations) should be at least 300 metres from rivers, streams, lakes and wetlands. (Implementation phase) d) Use secured area for refuelling and transfer of other toxic fluids distant from settlement area (and at least 50 metres from drainage structures and 100 metres from important water bodies); ideally on a hard/non-porous surface. (Implementation phase) e) Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear and other protective equipment for protection in handling highly hazardous materials. (Implementation phase) f) Collect and properly dispose of small amount of maintenance materials such as oily rags, oil filters, used oil, etc. Never dispose spent oils on the ground and in water courses as it can contaminate soil and groundwater (including drinking water aquifer). (Implementation phase) g) Wash paint brushes in a container (bucket etc.). Leave the water to evaporate and then dispose of the waste paint with general waste. (Implementation phase) h) After each construction site is decommissioned, all debris and waste shall be cleared. (Post-Implementation phase)	
6. Asbestos	a) If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste. (Implementation phase) b) The asbestos should be appropriately contained and sealed to minimize exposure. (Implementation phase) c) Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. (Implementation phase) d) If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labelled. (Implementation phase) e) Removed ACM must not be reused. (Implementation and post-implementation phase)	
7. Health and Safety	a) When planning activities of each subproject, discuss steps to avoid people getting hurt. (Planning phase) It is useful to consider: • Construction place: Are there any hazards that could be removed or should warn people about? • The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their works safely? • The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do you have the right	

	equipment (e.g. ladders of the correct height)? Do people need any skills or knowledge to enable them to use it safely? • Electricity Safety: Do any electricity good practices such as use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measure, aware on identifying burning smell from wires, etc. apply at site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers? b) Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles). (Implementation phase) c) Follow the below measures for construction involve work at height (e.g. 2 meters above ground (Implementation phase): • Do as much work as possible from the ground. • Do not allow people with the following personal risks to perform work at height tasks: eyesight/balance problem; certain chronic diseases – such as osteoporosis, diabetes, arthritis or Parkinson’s disease; certain medications – sleeping pills, tranquillisers, blood pressure medication or antidepressants; recent history of falls – having had a fall within the last 12 months, etc. • Only allow people with sufficient skills, knowledge and experience to perform the task. • Check that the place (e.g. a roof) where work at height is to be undertaken is safe. • Check that equipment to be used it fit for purpose (ladder in good condition, stable and correct height and to be used only for short period of time. Elevated work platform or scaffolding to be used for works of longer duration) • Take precautions when working on or near fragile surfaces. • Clean up oil, grease, paint, and dirt immediately to prevent slipping; and • Provide fall protection measures e.g. safety harness, simple scaffolding/guard rail for works over 2.5 meters from ground. d) Keep worksite clean and free of debris on daily basis. (Implementation phase) e) Provision of first aid kit with bandages, antibiotic cream, etc. or health care facilities and enough drinking water. (Implementation phase) f) Keep corrosive fluids and other toxic materials in properly sealed containers for collection and disposal in properly secured areas. (Implementation phase) g) Ensure adequate toilet facilities for workers from outside of the community. (Implementation phase) h) Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations. Do not allow children to play in construction areas. (Implementation phase) i) Ensure structural openings are covered/protected adequately. (Implementation phase)	
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	j) Secure loose or light material that is stored on roofs or open floors. (Implementation phase) k) Keep hoses, power cords, welding leads, etc. from laying in heavily traveled walkways or areas. (Implementation phase) l) If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. (Implementation phase) m) Control driving speed of vehicles particularly when passing through community or nearby school, health center or other sensitive areas. (Implementation phase) n) During heavy rains or emergencies of any kind, suspend all work. (Implementation phase) o) Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases and possible drowning. (Post-Implementation phase)	
8. Other	a) No cutting of trees or destruction of vegetation other than on construction site. [Implementing agency] will procure locally sourced materials consistent with traditional construction practices in the communities. (Planning phase) b) No hunting, fishing, capture of wildlife or collection of plants. (Implementation phase) c) No use of unapproved toxic materials including lead-based paints, asbestos, etc. (Implementation phase) d) No disturbance of cultural or historic sites. Significant sites or items near to the works should be clearly marked to avoid disturbance. (Planning and implementation phases). e) If UXO are likely to be present, engage approved contractor to clear the site and apply chance finds procedures (planning and implementation phase). f) Follow Project LMP for management of workforce (planning and implementation phase). g) Follow Project LAP for accessing land (planning phase).	

Specific ESCOPs for Infrastructure Subprojects

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
<i>Small Classrooms or other Buildings</i>		
In general	a) Provide adequate drainage in the building's immediate surroundings to avoid standing water, insect related diseases (malaria, etc.) and unsanitary conditions. (Implementation phase) b) Include sanitary facilities such as toilets and basins for handwashing. (Implementation phase) c) Use of asbestos cement tiles as roofing is prohibited. (Implementation phase) d) Tiled or concrete floors are preferred for easier cleaning and more hygienic. (Planning and implementation phases)	
Shelters, community centers, schools, kindergartens.	a) Design of schools, community centres, markets should follow relevant requirements on life and fire safety required by National Building Codes and relevant guidelines from the concerned Ministries. (Planning phase) b) Schools: Maximise natural light and ventilation systems to minimise needs for artificial light and air conditioning; use large windows for bright and well-ventilated rooms. (Planning phase)	
<i>Solar Power Array</i>		
Solar power supply	a) Tidy wiring for easy maintenance and reduces the risk of accidents. (Implementation phase) b) Need to raise community awareness on electrical hazards and health and safety concerns, as well as proper maintenance of solar panels (Implementation and post-implementation phases) c) Need to raise community awareness on proper disposal of solar panels, specifically avoiding disposal of panels near water bodies. (Post-implementation phase)	
<i>Access to Sanitation</i>		
Public latrines/toilets	a) All toilets must have a septic tank made from non-permeable material such as concrete, plastic or fiberglass to provide primary treatment of fecal waste. (Implementation phase) b) PVC pipe used to connect pour-flush toilet to a septic tank must be buried underground or covered over (with cement) for protection and to prevent exposure to sunlight. (Implementation phase) c) Metal pipe is a preferred choice to be used as the gas vent pipe on septic tanks. Never use PVC pipe as it is unable to withstand long-term exposure to sunlight. (Implementation phase) d) A toilet should be at least 20 meters from water sources (well, spring, river). (Planning and implementation phases)	

ANNEX 3. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) TEMPLATE

Environmental and social risks and impacts are strongly linked to subproject location and scope of activities. This ESMP template can be used as a guide and should be customized for each specific subproject location and activities.

1. Subproject Information

Activity Title:	
Estimated Cost:	
Proposed Start and Completion Dates:	

2. Site/Location Description

In this section, concisely describe the proposed location and its geographic, ecological, social and temporal context including any offsite investments that may be required (e.g., access roads, water supply, etc.). Please attach a map or photos of the location to the ESMP.

3. Subproject Description and Activities

In this section, list all the activities that will take place under the subproject activity, including any associated activities (such as building of access roads).

4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

In this section, identify anticipated site-specific adverse environmental and social risks and impacts; describe mitigation measures to address these risks and impacts; and list the monitoring measures necessary to ensure effective implementation of the mitigation measures. It may draw from the ESMF's pre-identification of potential risks/impacts and mitigation measures, as applicable, and drill down further to ensure relevance and comprehensiveness at the site-specific level. For activities involving construction, two sets of tables may be needed, for the construction phase and the operation phase.

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation		Impact/Mitigation Monitoring		
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility

5. Capacity Development & Training

Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.

6. Implementation Schedule and Cost Estimates

In these sections state the implementation timeline for the mitigation measures and capacity development measures described above, as well as a cost estimate for the implementation. The cost estimate can focus on the line items that will be covered by the project implementing agency, with costs of mitigation measures to be implemented by the contractor left to the contractor to calculate.

7. Attachments

Site specific SECAP, LLDR, etc.

IV. Review & Approval

Prepared By:(Signature) Position: Date	
Reviewed By:(Signature) Position:Date	Approved By:(Signature) Position: Date

ANNEX 4. LAND ACCESS PROCEDURE

Purpose

This Land Access Procedure (LAP) outlines the principles, objectives, and procedures that the National Department of Education (NDoE) will use to manage land access and associated impacts during project implementation.

The LAP will be updated during Project implementation phase to include further information on the areas of land potentially impacted, as well as land tenure arrangements. These LAP have been prepared for Phase 1 of the Learning Enhancement and Access Program MPA (the Project) and will also be adjusted for each phase of the MPA.

Legal and Policy Framework

This LAP has been prepared within the context and requirements of the relevant national regulatory and institutional framework, and the World Bank ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. World Bank ESS5 acknowledges that the project related land acquisition and restriction on land use can have adverse impact on the affected people, communities, individuals, and that involuntary resettlement should be avoided.

Scope of Land Acquisition and Resettlement

Project infrastructure investments are expected to include the repair and renovation of existing school buildings (i.e. classrooms and staff housing) and existing early childhood education facilities including potentially new WASH facilities and rooftop solar systems (i.e. ~3kv) for lighting and charging; and the installation of digital infrastructure (i.e. ~5kv solar system and internet connectivity). Target school buildings and ECE centres are expected to be located on a mix of state, freehold and customary land.

Many of these investments will not require additional land, however in some cases, the renovation of existing facilities may require minor increases in the overall footprint of the facility. Access arrangements may also be needed for the use of existing roofs for the installation of solar PV systems.

The locations and designs for these investments will be confirmed during project implementation. Land access for investments in existing or new infrastructure will be confirmed through due diligence, negotiated settlement or voluntary donation in accordance with ESS5.

Guiding Principles for Land Access

The guiding principles for land access and acquisition (if required) for the Project are that:

1. Activities requiring involuntary land acquisition and significant physical and/or economic displacement impacts will not be eligible
2. Physical displacement and economic displacement impacts will be minimized via site selection and effective designs.
3. Activities requiring physical displacement to another location or forced eviction will not be eligible.
4. Where economic displacement cannot be avoided, impact mitigation measures will include timely compensation for loss of assets at replacement cost and should be better off or at least as well off as before the Project.
5. Potentially Affected Persons (PAPs) will be meaningfully consulted throughout the Project, with comprehensive disclosure of Project information.
6. Decisions on land access will be made with the informed consent, free of coercion, with the right of refusal, and will not unduly affect the donor.
7. Voluntary land donation will follow the Voluntary Land Donation protocol which ensures compliance with ESS5 – para 10

8. PAPs will have the opportunity to participate in Project planning and to share in Project benefits
9. Information on land and associated impacts, including documentation of the consultation process, shall be disclosed in a timely manner, in an accessible place and in a form and language that are understandable to key stakeholders.
10. The Project should contribute towards sustainable development.

Procedures for confirming/securing land for sub-projects

All proposed infrastructure projects require initial E&S screening. During E&S screening, the existing site (improvements to existing facilities/rooftop access) or proposed site(s) (new infrastructure/extended footprint) will be identified and initial information on land tenure type (state, freehold or customary), land ownership and use, disputes, and resettlement impacts will be recorded.

Sites with existing land disputes will not be eligible under the project.

Confirming land arrangements for existing facilities

Due diligence of existing land (and rooftop access) access arrangements will be conducted during sub-project / grant preparation. This will include obtaining documented evidence including state land lease, freehold lease, customary land use agreement or other legally recognized document. This documentation will be verified/confirmed with local authorities.

Where this documentation cannot be obtained and verified the land access procedures for accessing land for new facilities (below) will need to be followed and land access documentation obtained, before the subproject can proceed.

Accessing land for new facilities

The land acquisition/access process in PNG can be complex. Land access options for the project are outlined below. How formal the land access arrangements are will be determined by the scale and type of infrastructure, the ownership of the infrastructure, whether the infrastructure is solely for the community where it is located or providing education services for several communities. Regardless of the land tenure type, the fundamental approach adopted for accessing the land will be through meaningful consultation and negotiation.

1. State and Freehold Leases

Land access via state or freehold lease arrangement is an agreement between two parties (landowner and land user) formalized in a signed legally binding lease agreement with terms and conditions mutually agreed on. In negotiations, all losses accrued to legal occupiers (tenants) who will be relocated are the responsibility of the landowner.

Process for lease arrangements:

- **State Land Leases:**
 - Administered by the Lands Boards.
 - Negotiations for lease transfers must involve the confirmed state land lease holder.
 - All state lease transfers are processed through the Lands Board.
- **Freehold Land:**
 - Negotiations must involve the confirmed holder of the Certificate of Title (and the current lease holder, if applicable).
 - Lease arrangements will be processed through the Lands Board.
- **Extended Lease Periods:**
 - Land may be transferred or leased for a period exceeding 25 years only with the consent of the Lands Board.

2. Voluntary Land Donation / Customary Land Use Agreements

Voluntary land donation (without payment of full compensation) may be an appropriate form of land access in circumstances where the community are the sole beneficiaries of the proposed infrastructure and provided that NDoE demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land.

Process for VLD:

- Determine and document the appropriateness of VLD in the project context
- Verify the requirements of the donation and the formalization of the donation
- Carry out due diligence on the owners and the users of the land donated
- Ensure appropriate consultation and disclosure
- Establish informed consent of the person donating the land
- Establish and socialize the GM.

The PMU will maintain a transparent record of all consultations and agreements reached. Example VLD Form is included in Appendix C.

Compensation of Assets

"Affected persons" are eligible to receive compensation or assistance under the NEAT. The assessment process for each sub-project will identify affected persons entitled to compensation and assistance as outlined in Table 1.

Table 1: Entitlements Matrix

Type of Loss	Entitled Person(s)	Entitlements
Permanent acquisition of land (change in title from customary to state)	Legal owner(s), including customary landowners	Landowners will be provided equivalent size and quality of land, or cash compensation at replacement value (including transaction costs)
Long-term lease (leasehold title)	Legal owner(s), including customary landowners. Government (for state-owned land)	The land title remains with the legal landowners; however, a long-term lease is negotiated with the customary landowner groups/legal owner at market rates and by agreement with the owners.
Temporary use of land through a short-term lease (less than 3 years) during construction (e.g., laydown areas)	Legal owner(s) of land, including customary landowners. Government (for state-owned land)	Landowners will be paid rent on terms negotiated between them and the contractor, but not less than current market rates. Land to be rehabilitated before the lease ends.
Damage to, or loss, of perennial trees,	Owner of asset, irrespective of whether or not they have	PAPs will be given 60 days' notice to harvest crops and trees before site clearance or removal from

crops, and other commodities	legally recognizable rights to the land on which the trees, crops, etc are grown.	required land. Compensation will be provided based on Valuer Generals Schedule of Payments for tree, crop and other commodity damage/loss (including transaction costs). However, higher rates will be paid in cases where Valuer General rates they do not represent full market value reflecting lost fruit production or timber value. Households losing more than 10% of their annual income will be given the opportunity for priority employment during construction, and the opportunity to participate in the livelihood restoration program.
Loss of seasonal crops	Crop owners irrespective of whether they have legally recognizable rights to the land on which the crops are located.	Provision of 60-day notice to harvest standing seasonal crops. If harvest is not possible, cash compensation for crops (or share of crops) equivalent to prevailing market price.
Loss of residential structures	Owner of asset, irrespective of whether they have legally recognizable rights to the land on which the house is located.	Full cash compensation for affected structures, at replacement cost (i.e., full value of replacement materials and labour at current market value, together with any other transaction costs), without deduction for depreciation or salvaged materials. Alternatively, structures will be replaced or restored to an equal or better condition with security of tenure. Assistance will be provided to relocate the household including an allowance agreed with affected households for adequate food and other consumable expenses. Adequate allowance will be provided for handling/transport costs as applicable for each affected household to transport belongings. A household allowance (to be confirmed) to cover the costs of a house forming ceremony. Additional assistance for vulnerable household including finding a suitable alternative location for informal settlers, ensuring that it is liveable). Entitlement to salvaged materials, no deductions will be made to compensation paid for depreciation or value of salvaged materials.
Loss of ancillary structures (e.g. fences and storage sheds) and semi-permanent commercial	Owner of asset, irrespective of whether they have legally recognizable rights to the land on which the structures are located.	Reinstatement to former condition or better; or Compensation based on replacement costs and/or relocation costs (including transaction costs).

structures (e.g. road stalls and stores)		
Loss of structures (e.g., roadside markets)	Owner of asset, irrespective of whether they have legally recognizable rights to the land on which the structures are located.	PAPs will be provided compensation at replacement cost without deductions for depreciation or salvaged materials and assistance in finding an alternative site. It will be ensured that replacement structures are ready before relocation of existing structures.
Disruption to business due to works	Owners of trade stores and other roadside businesses; roadside vendors	Will be provided advance notice (at least 60 days) and assistance to relocate business with minimal impacts on income. If required, affected households / owners will be entitled to compensation based on the number of days of lost income up to a maximum period of 2 months.
Displacement of Government of community structure (if any)	Community or government agency representatives	Affected structures will be restored in consultation with community and/or relevant government agency or cash compensation will be provided at replacement value without deductions for any materials salvaged. Community will be assisted in dismantling and relocating/re-establishing structure/property.
Graves, cemeteries, burial and tambu sites	Owners and family members of graves/ cemeteries/ burial sites	A new location for the affected graves will be arranged in consultation with the affected families and owners. Compensation will be paid in accordance with the provisions of the Valuer General's Compensation Schedule, with annual increases based on market rates. An allowance of will be provided for the ceremony (includes pigs), purchase of the new coffin, transport, and other associated costs.
Impacts on vulnerable PAPs	Vulnerable AP households identified by social assessment	Will be provided advance notice of at least 60 days prior to impacts. Vulnerable households will receive (i) priority for any project-related employment; (ii) opportunity to participate in the livelihood restoration program, and (iii) additional cash allowance for food and other necessities while rebuilding residential/business structures or re-planting food gardens.
Unforeseen impacts	Concerned affected persons	These will be determined as per the principles of ESS5.

Temporary land taking for contractors use during construction phase

Temporary land taking required for contractors' laydown and storage areas is typically left to the contractors to negotiate directly with local landowners during the pre-construction phase. No resettlement instrument is required. Rather, the ESMP stipulates conditions for managing impacts associated with these land use, including to ensure affected land is fully restored to its pre-project condition or better, before contractors leave. The ESMP will also require that Contractors show signed consent of landowners for the temporary use of their land before the commencement of civil works.

Preparation of Land Due Diligence Reports

Once the activity's locations are known, the PMU E&S Specialist shall screen each subproject and its activities to assess the likely impacts related to land and land access, consistent with ESS5 and the guidance provided in the LAP and prepare a site-specific LDDR (if required).

The screening and assessment will include:

- i. Guidance on design and siting of works to avoid and mitigate impacts on land access or displacement.
- ii. Due diligence on land that will be used and accessed for the Project activities.
- iii. Confirmation of lease arrangements including pricing, terms, and transitional arrangements for Project-supported facilities.
- iv. Confirmation of voluntary land access arrangements.
- v. Identification of individuals who may have their access to land restricted as result of project activities and whether these impacts can be avoided or mitigated.

The procedure for preparing the LDDRs is included in Appendix A. Note that for state or freehold lease transfers, a LDDR is not necessary.

Consultations and Information Disclosure

Information regarding the sub-component objectives, processes, and timeframes will be disclosed to affected communities during project preparation.

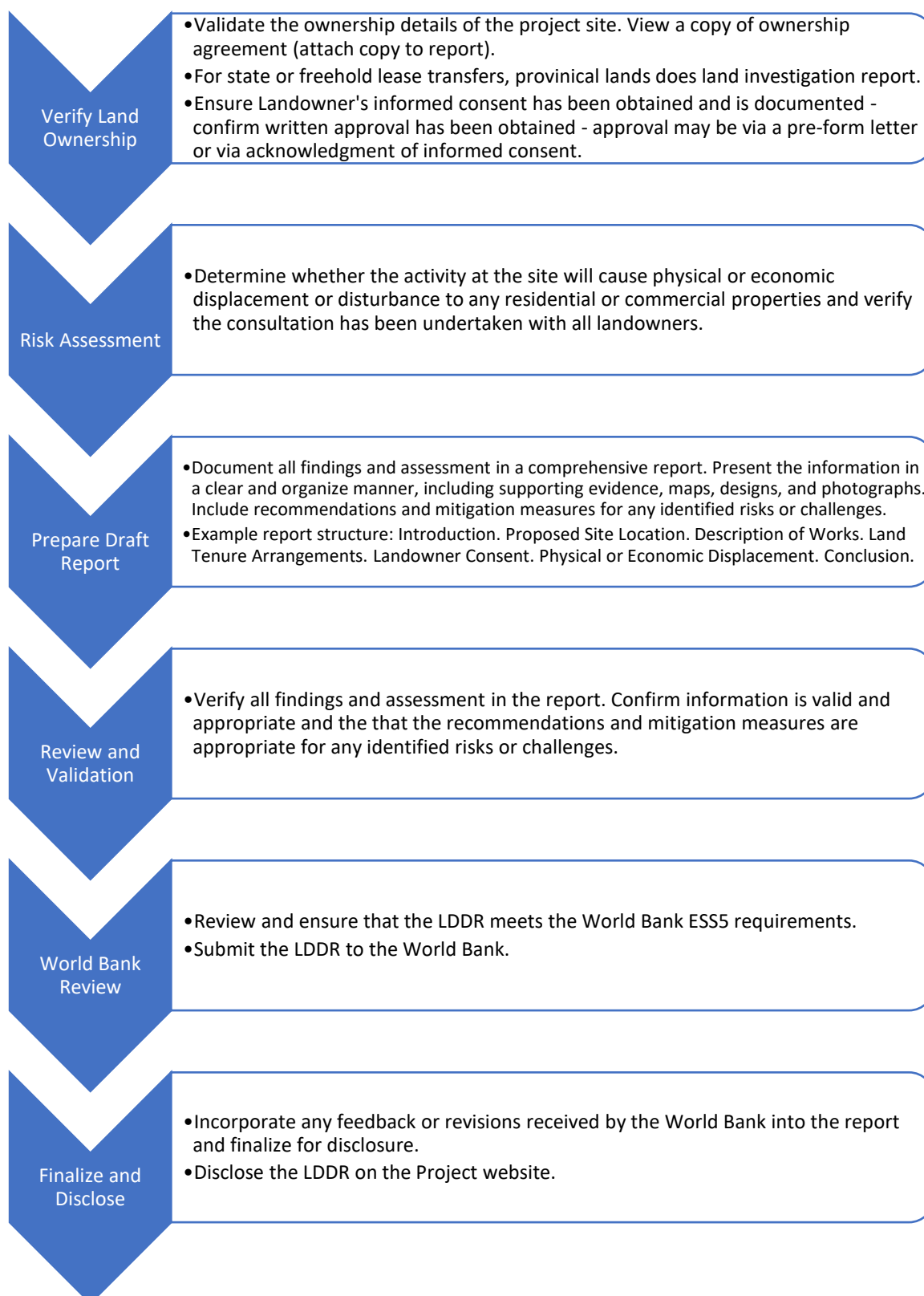
During Project implementation, specific consultation and meetings will be held with any APs if any activity is identified to take place or encroach on private land.

The LAP will be disclosed as part of the ESMF on the NDoE website, prior to project appraisal. The final version of the LAP will be disclosed on the NDoE's website (<https://www.education.gov.pg/>) and World Bank websites. LDDRs shall be disclosed in a timely manner, in an accessible place and in a form and language that are understandable to key stakeholders.

Project Grievance Mechanism

The Project GM is outlined in the Stakeholder Engagement Plan (SEP) and is available to any interested and/or affected persons. Where complaints cannot be resolved by the GM process, or, where a person is not satisfied with the outcome, the complainant is able to take their complaint through the normal Papua New Guinea legal processes.

APPENDIX A - PROCEDURE FOR PREPARING A LAND DUE DILIGENCE REPORT (LDDR)



APPENDIX B - EXAMPLE OF CUSTOMARY LAND USE AGREEMENT

The Clan Land Use Agreement (CLUA) applies when (i) customary land is required for small-scale communal facilities; (ii) no suitable alternative sites exists, and (iii) customary landowners have agreed for the land to be used for a specific purpose, over a specific timeframe, for the benefit of the whole community. The CLUA does not apply when state- or privately-owned land will be utilized or needs to be acquired. The agreement will be in relation to small-scale facilities that are of direct community benefit. It is important that absentee landowners are engaged, and that a suitable witness (non-clan member) signs this agreement. Due diligence on correct customary landowners must be conducted prior to the signing of this agreement.

The process to enter into the CLUA is as follows:

- If land is required for the identified sub-project, then the clan leaders of the community, along with other community leaders as appropriate (chief, religious leaders, etc.), would organize a meeting with the representatives of the specific clan who have customary ownership of the proposed land.
- Any persons with fixed physical assets on the land/proposed site, but not considered a landowner, is involved in meetings and their rights are taken into consideration.
- Confirm that the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels.
- The meeting would discuss the proposed sub-project with the land-owning clan to reach an understanding that the partnership is for the benefit of the whole community and change of land use (either permanent or temporarily) is required.
- Share the rationale for the sub-project and its proposed siting and seek the donation of the necessary land by the owning clan.
- The landowners would also be notified clearly that their agreement to donating their land should be completely voluntary and will not involve compensation, now or into the future.
- If agreement to proceed is reached, then a CLUA will be entered into between the clan, the other clans and the leader of the community.
- The CLUA should be endorsed by the Ward Councilor and Provincial and/or District Lands Officer.
- The signed CLUA will be submitted as part of the sub-project proposal.
- The CLUA is submitted to the local magistrate or equivalent for certification

Should natural resources be gifted by community members from an area different to the project site, it is recommended that a similar agreement ('Resource Use Agreement'), be made and an alternative to the CLUA, but one that specifies which natural resources can be utilized as part of the community contribution

Exit Strategy and Grievances

If all landowner parties disagree about the land or conditions of CLUA, or if landowners are excluded from initial discussions then the partnership will not proceed and the grievance process must be followed.

Clan Land Use Agreement Form

Date: _____

1. We the undersigned being the representatives of _____ Clan, hereby acknowledge that _____ have the right under customary law to lease the land know as _____ for the purposes of _____. We certify that all members of the clan agree to the truth of this certificate and that we are the persons authorized by the Clan to sign it.
2. We, the undersigned being the representatives of _____ Clan of _____ Village, _____ LLG, _____ District, hereby declare that:
 - i. We have the right under customary law to gift the _____ land for the purpose of _____.
 - ii. That we transfer rights to use and access of the said land to benefit our community for a period of no less than 20 years.
 - iii. We agree to allow the use of natural resources located on the said land for the purposes of the community project.
 - iv. We commit ourselves to upholding the contents and the spirit of this agreement for so long as it remains in force and understand compensation payments will not be made for this is a gift to benefit the broader community.
 - v. We understand that dishonoring this agreement could result in the termination of this community project and we will undertake efforts to convey the contents of this agreement to members of the _____ clan to ensure that they so honor it.
3. Inventory of Natural Resources

Resource/bush materials	Quantity	Donated by

--	--	--

4. Customary Landowners and Community Leader

Village	Name (First, Last)	Signature and Date	Contact Details

5. Government Representatives and Witnesses

Village	Name (First, Last)	Signature and Date	Contact Details

Made under our hands these agreements:

On this date _____

At this Location: _____ village, _____ LLG, in Papua New Guinea

Submitted to the Local Authority

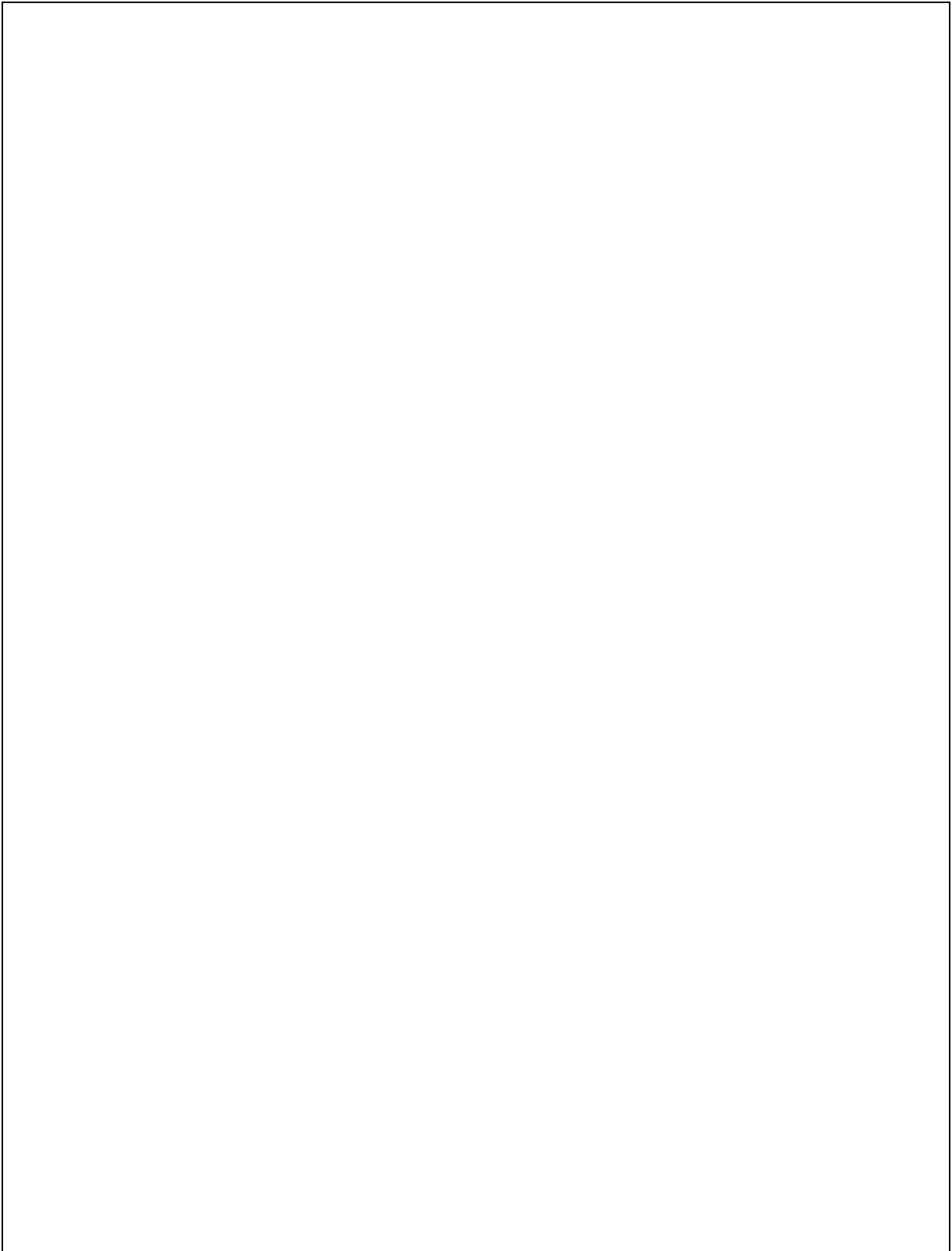
On this date _____

At this Location: _____ Ward/District/Province, Papua New Guinea

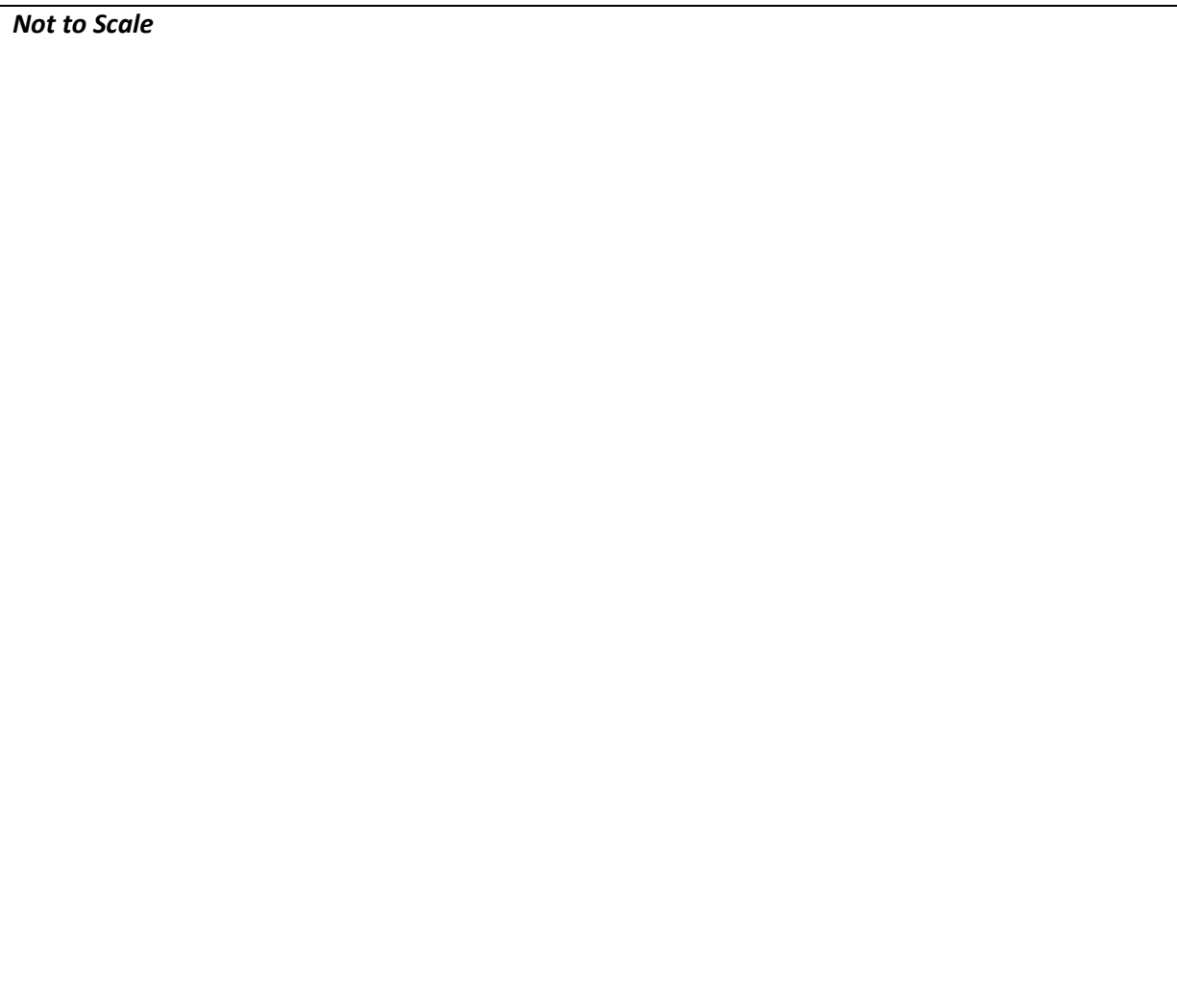
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Mapping Relation to Location and Land Boundaries



Not to Scale



ANNEX 5. CHANCE FINDS PROCEDURES FOR CULTURAL ITEMS AND UXO

Cultural Heritage Chance Finds Procedures

Cultural heritage encompasses tangible and intangible heritage which may be recognized and valued at a local, regional, national or global level. *Tangible cultural heritage*, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings and may be above or below land or under the water. *Intangible cultural heritage*, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts and cultural spaces associated therewith— that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

If during construction, sites, resources or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents. These procedures consider requirements related to Chance Finding under national legislation including the National Cultural Property (Preservation) Act 1965.

- Stop the earthworks, construction, or land clearing activities around the chance find temporarily.
- Delineate the discovered site or area.
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the National Museum and Art Gallery or relevant government departments take over.
- Notify the Supervisory Engineer / Site Manager who in turn will notify the responsible local authorities and the National Museum and Art Gallery or relevant government departments immediately.
- Responsible local authorities and the National Museum and Art Gallery or relevant government departments would oversee protecting and preserving the site before deciding on subsequent appropriate procedures.
- Decisions on how to handle the finding shall be taken by the responsible authorities and the National Museum and Art Gallery or relevant government departments.
- Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the National Museum and Art Gallery or relevant government departments.
- Construction work could resume only after permission is given from the responsible local authorities and the National Museum and Art Gallery or relevant government departments concerning safeguard of the heritage.

These procedures must be referred to as standard provisions in construction contracts. During project supervision, the Site Engineer / Site Manager shall monitor the above regulations relating to the treatment of any chance find encountered are observed. Relevant findings will be recorded in World Bank Supervision Reports and Implementation Completion Reports will assess the overall effectiveness of the project's cultural heritage mitigation, management, and activities.

Unexploded Ordnances (UXO) Chance Finds Procedures

In the event of a suspicious Unexploded Ordnance (UXO) discovery, the following risk mitigation measures should immediately be followed:

- The contractor must immediately stop work and clear the work site of all personnel.
- The area must be cordoned off appropriately.
- Physical measures must be put in place to avoid unauthorized tampering of the UXO find.
- Highly visible signs are to be installed at the HIGH-RISK area.
- The UXO risk is to be communicated to surrounding communities.

The UXO chance find should be immediately reported to the Supervising Engineer / Site Manager, the NDoE PMU, the Police, and the World Bank.

The Police will be responsible for arranging the assessment, mitigation, and/or elimination of any UXO-related hazard.

No physical works shall recommence on site until instruction has been received from the Police and the NDoE PMU.

Relevant findings will be recorded in World Bank Supervision Reports and Implementation Completion Reports will assess the overall effectiveness of the Project's UXO chance finds procedures.

ANNEX 6. GENDER BASED VIOLENCE (GBV) ACTION PLAN

Papua New Guinea Learning Enhancement and Access Project (PNG LEAP)

Gender-Based Violence (GBV) Prevention and Response Action Plan

1. Purpose

To articulate:

Risks of GBV related to planned Project activities.

Strategies to mitigate and respond to risks of Project-Related GBV.

Risks of School-Related GBV in Early Childhood Education (ECE) settings.

Strategies to strengthen systems to prevent and respond to School-Related GBV in ECE settings.

Implementation of the Action Plan will contribute to the implementation of the following legislation and policies of the Government of Papua New Guinea (GoPNG):

Lukautim Pikinini Act.

National Education Plan.

ECE Policy.

School Learning Improvement Plan Policy and Guideline.

Behaviour Management Policy.

Gender Equity and Social Inclusion (GESI) in Schools Policy.

National Public Service GESI Policy

2. Project

Proposed Development Objective

To reduce learning poverty.

Components

Prepare children to be ready to learn through ECE.

Support teachers to teach effectively.

Modernise the infrastructure and the management of the Education sector.

Project management, monitoring and evaluation and capacity building.

3. Risks of GBV

The risks of GBV in the Project relate to risks specific to planned Project activities as well as risks of School-Related GBV where the Project is well placed to strengthen systems to prevent and respond to School-Related GBV.

School-Related GBV refers acts, or threats, of violence that results from unequal gender norms.⁷ It includes, for example, physical violence, including physical assault and corporal punishment, sexual violence, including sexual abuse and sexual harassment, and psychological violence, including verbal and emotional abuse and coercion. It also includes bullying, that is gender-based, which can be physical, sexual or psychological. School-Related GBV may occur within and around the school / education setting, as on the way to and from school and in community or home spaces, particularly online. Potential perpetrators of School-Related GBV may be school personnel (teachers, school management, school staff) as well as other students with violence directed towards students as well as school personnel.

GBV risks specific to planned Project activities focus on the Project Workers, and specifically where the Project activities provide increased opportunities for Project Workers to use:

Sexual abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.⁸

Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.⁹

Sexual harassment: any form of unwanted verbal, non-verbal, or physical conduct of a sexual nature.

¹⁰

Component	Specific Activities	Opportunity for Project-Related SEA / SH	Opportunity for School-Related GBV (non-sexual)
Component 1: Prepare children to be ready to learn through ECE.	<i>Subcomponent 1.1:</i> Enhancement of Existing ECE Centres.	Sexual abuse or exploitation of children by employees of the ECE Centres. Workplace sexual harassment within the ECE Centres.	Physical violence, corporal punishment, or psychological abuse by employees of the ECE towards children. Physical violence or bullying among children.
		Workplace sexual harassment within and by ECE resourcing units.	

⁷ United Nations Educational, Scientific and Cultural Organization (UNESCO) (2016). *Global Guidance on Addressing School-Related GBV*.

⁸ World Bank (2022). *Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations*.

⁹ Ibid.

¹⁰ Ibid.

	<i>Subcomponent 1.2:</i> Establishment of Community Playgroups.	Sexual abuse or exploitation of children by facilitators of community play groups.	Physical violence, corporal punishment, or psychological abuse by employees of the ECE Centre towards children. Physical violence or bullying among children.
Component 2: Support teachers to teach effectively.	<i>Subcomponent 2.2:</i> In-service teacher training and ongoing support.	Sexual exploitation of potential training candidates. Workplace sexual harassment during teacher training.	
	<i>Subcomponent 2.3:</i> Teacher Diploma Upgrading.	Sexual exploitation of teachers seeking diploma.	
Component 3: Modernise the infrastructure and the management of the Education sector.	<i>Subcomponent 3.3:</i> Needs-based investments in physical infrastructure for schools.	Sexual exploitation, abuse or harassment by Project Workers during construction works of children, teachers, school staff or the surrounding community.	

Risk Mitigation (Prevention)

Component 1

Subcomponent 1.1: Enhancement of Existing ECE Centres

The Project will support recipients of grants to enhance existing ECE Centres to establish, review and implement child safeguarding procedures required of ECE's under the *Lukautim Pikinini Act 2015* and in-line with National Department of Education policies and procedures. These National legal and policy frameworks reflect global guidance to respond to School-Related GBV, and violence against children as well as key lessons from the implementation of education programs, through private services providers, with the International Finance Corporation (IFC) which emphasis the needs to robust policy and legislative frameworks that are effectively implemented.¹¹ The Government of Papua New Guinea faces significant personal, capacity and resource challenges implementing the *Lukautim Pikinini Act* within the education sector. Thus, the Project will indirectly contribute to strengthening these systems with a focus on ECE.

The National Education Plan¹² commits that ECE institutions, operated by the private sector, church,

¹¹ UNESCO (2016). *Global Guidance on Addressing School-Related GBV*; World Health Organisation (WHO) (2016). *INSPIRE: seven strategies for ending violence against child*; European Bank for Reconstruction and Development (EBRD), CDC and IFC (2020). *Addressing Gender-Based Violence and Harassment (GBVH) in the Education Sector*.

¹² Government of Papua New Guinea. *National Education Plan 2020-2029*.

community or civil society, will operate in accordance with the ECE Policy¹³ which requires that ECE is a safe, secure, healthy, child-friendly and inclusive learning environment for children. Under the Policy, the National Office of Child and Family Services, under the Department for Community Development and Religion, are responsible for the protection and welfare of children attending ECE Centres and the implementation of the *Lukautim Pikinini Act* within ECE as well as the licensing and supervision of daycare and private ECE providers.

In-line with the ECE Policy, that requires that ECE teachers must not have any previous cases of violence, or child sexual abuse, the Project will support the strengthening of selection and recruitment systems for employees that screen for prior offenses relating to child abuse and sexual assault, and that deter perpetrators of child abuse and sexual assault from seeking employment in ECE.

The Project will strengthen registration and monitoring requirements to ensure individual ECE have and implement child protection policies, in-line with requirements of the *Lukautim Pikinini Act*, including explicit reference to physical violence, corporal punishment, and sexual, exploitation abuse and harassment. All employees of ECE's will be required to:

- Sign a Code of Conduct that specifically prohibits SEA / SH and child abuse and clearly outlines mandatory requirements of school employees under the *Lukautim Pikinini Act*.

- Complete an induction session on the SEA / SH and child protection responsibilities under the *Lukautim Pikinini Act*.

The Project will support the strengthening of governance mechanisms for the ECE to include monitoring systems to ensure adherence to the *Lukautim Pikinini Act*. These monitoring mechanisms will utilize the existing requirements of ECE Centers to have, implement and monitor their School Learning Improvement Plan (SLIP)¹⁴ ensuring that all ECE Centers who receive grants have a SLIP in-line with the National Education Plan.

The Project will strengthen registration and monitoring requirements to ensure individual ECE school rules and code of conducts to be in place to maintain respect among students, in alignment with the Behaviour Management Policy.¹⁵

The Project will also ensure individual ECE institutions are effectively implementing the GESI in Schools Policy¹⁶ as well as the National Public GESI Policy.¹⁷

Subcomponent 1.2: Establishment of Community Playgroups

As child-care providers, community playgroup facilitators are also bound by mandatory reporting of suspected or actual child abuse under the *Lukautim Pikinini Act*. The Project will establish procedures for the recruitment of community playgroup facilitators to screen for prior offences relating to child abuse and sexual assault, and that deter perpetrators of child abuse and sexual assault from seeking roles as facilitators.

All community playgroup facilitators will also be required to:

- Sign a Code of Conduct that specifically prohibits SEA / SH and child abuse and exploitation.

- Complete an induction session on the SEA / SH and child abuse and exploitation.

¹³ Government of Papua New Guinea. *Early Childhood Education Policy 2020*.

¹⁴ Government of Papua New Guinea. *School Learning Improvement Plan Policy and Guideline 2021*.

¹⁵ Government of Papua New Guinea. *Behavior Management Policy (2009)*.

¹⁶ Government of Papua New Guinea. *Gender Equity and Social Inclusion (GESI) in Schools Policy (2023)*.

¹⁷ Government of Papua New Guinea. *National Public Service GESI Policy*.

Component 2

Subcomponent 2.2: In-service Teacher Training and Ongoing Support and Subcomponent 2.3: Teacher Diploma Upgrading

To manage Project-Related SEA/SH, Contractors, or institutions, responsible for education of teachers will be required to have Code of Conduct that prohibit employees sexually exploiting, abusing or harassing participants. This will include employees:

Signing a Code of Conduct that specifically prohibits SEA / SH.

Complete an induction session on the SEA / SH.

To contribute to the prevention and response to School-Related GBV, teacher training will include training to adhere to the Behaviour Management Policy to better equip teachers to model gender equal, respectful and non-violent relationships, teach respectful and non-violent behaviour among students and to ensure teachers manage student behaviour without the use of corporal punishment. Teacher training will also include skills building for teachers to identify and respond to child abuse, and School-Related GBV, in-line with their responsibilities to protect children and report suspect or actual child abuse under the *Lukautim Pikinini Act*. Such a proactive approach global guidance as well as key lessons from the IFC working with private education providers.¹⁸

The Project will also provide training to counsellors assigned to ECE Centres to identify and respond to child abuse, and School-Related GBV.

Component 3

Subcomponent 3.3: Needs-based Investments in Physical Infrastructure for Schools.

All contractors will require Project Workers to

Sign a Code of Conduct that specifically prohibits SEA / SH.

Complete an induction session on the SEA / SH.

In alignment to the National Education Plan, the design of infrastructure will be gender sensitive, particularly regarding water, sanitation and hygiene facilities. To facilitate this, and in alignment with the National Education Plan, women will be represented during community consultation and school decision-making commitments that deal with the construction.

Components 1, 2 and 3

Community awareness will be conducted in locations of the ECE, and infrastructure works to ensure that the community:

Understand the Code of Conduct, and expectations related to SEA/SH and child protection.

Know how to make a report related to SEA/SH and child protection by someone working on the Project and School-Related GBV.

Risk Response

In-line with global guidance as well as key lessons from the IFC, the Project will support strengthening

¹⁸ UNESCO (2016). *Global Guidance on Addressing School-Related GBV*; WHO (2016). *INSPIRE: seven strategies for ending violence against child*; EBRD, CDC and IFC (2020). *Addressing GBVH in the Education Sector*.

and establishment of procedures to respond to Project-Related SEA/SH and School-Related GBV.¹⁹ In doing so, the Project will assist ECEs to comply with commitments and requirements in the National Education Plan, ECE Policy, SLIP Policy and Behaviour Management Policy.

The Project will support the National Department of Education ensure that the governance structure of ECE includes effective partnership with the National Office of Child and Family Services to ensure the effective response to reports of SEA/SH and child abuse or exploitation received by the Department related to ECE Centres.

The Project, through Component 1, will ensure that individual ECE Centers who receive grants have a complaint mechanism to receive and resolve complaints of School-Related GBV and reports relating to child protection (that may occur outside the school context), in-line with responsibilities under the *Lukautim Pikinini Act*.

The Project Grievance Mechanism (GM) will include details of how reports of SEA/SH and child abuse or exploitation, that are Project-Related, will be received, and resolved. This GM will also articulate the process to respond to complaints of GBV that are not Project-Related, that may be received by the Project.

The Project GM will ensure the survivor's safety, rights, needs, and wishes will be prioritised. This means:

Safety	Nothing will happen that puts the survivor at further risk of harassment, violence or retaliation by the alleged perpetrator or anyone else.
Choice	The survivor will choose what happens and be involved in decision-making including what action(s) are taken and what information about the incident is shared.
Consent	The survivor will provide consent at each stage of the complaint handling process.
Confidentiality	The survivor's privacy and confidentiality will be protected including that all information that is captured about the incident will be kept confidential.
Informed	The survivor will be provided comprehensive information so that they know what is happening and what will happen at each stage of the process.
Supported	The survivor will be referred to and supported to access specialist services to assist in their recovery including accessing police, court, health, and social services.
Respect	The survivor will be always treated with dignity and respect.
Non-discrimination	The process will not discriminate based on sex, age, race/ethnicity, ability, sexual orientation or gender identity, or other characteristics.

In addition to applying a survivor-centred approach, to uphold the rights of the survivor and alleged

¹⁹ UNESCO (2016). *Global Guidance on Addressing School-Related GBV*; WHO (2016). *INSPIRE: seven strategies for ending violence against child*; EBRD, CDC and IFC (2020). *Addressing GBVH in the Education Sector*.

perpetrator, the resolution of reports of incidents GBV, including SEA / SH, will be:

- Easy to access.
- Flexible to the specific needs of the survivor.
- Transparent with possible outcomes clearly explained and those involved will be kept informed of the progress of the report and the reasons for any decisions.
- Timely with an investigation into an incident commencing within 48 hours of the report and be resolved within 2 weeks, unless there are exceptional circumstances.
- Fair with decision-makers who do not have perceived or actual bias towards those involved in the report, particularly towards the alleged perpetrator or the victim / survivor.

The Project GM will follow this process:

Receive complaints of GBV, including SEA / SH	Complaints of SEA / SH can be reported: Through the existing channels of the GRM. In addition, complaints of SEA / SH can be received by focal points (who will be identified and will include women who the children, parents, teachers and communities' members are likely to feel comfortable reporting to). The person who receives the complaint will: • Tell the survivor about the closest GBV service providers including justice, health, safe accommodation and / or counselling. • Document and register the complaint. • Explain the GM complaints and reporting process to the survivor. If the survivor chooses to make a formal complaint to the Project, the person who received the complaint will communicate the allegation to the GM SEAH/SH Focal Point (TBD) within 24 hours of receiving the complaint.
Assess if the allegation is likely linked to the Project	The GM SEAH/SH Focal Point (TBD) will determine the likelihood of the allegation being linked to the Project. If the allegation is determined to be likely linked to the Project, the GM SEAH/SH Focal Point (TBD) will inform the World Bank within 48 hours of the determination with only the following data to be shared: • The nature of the allegation. • If the alleged perpetrator is, to the survivor's best knowledge, associated with the Project (yes/no). • The survivor's age and/or sex (if available). • If the survivor was referred to services.

Verify if the incident likely occurred	If an allegation is determined to be likely to be linked to the Project, the GM SEAH/SH Focal Point (TBD) will seek support from an appropriately qualified GBV specialist to determine the likelihood that the incident occurred by interviewing all the people involved. If it is determined that it was likely that the incident to occurred, disciplinary measures, that is proportional to the nature and severity of the incident, towards the alleged perpetrator should then be agreed and communicated to the individual's employer.
Act by taking disciplinary action	The employer of the perpetrator will implement the recommended disciplinary action in accordance with local legislation, the employment contract and the Code of Conduct. Once it is confirmed that disciplinary action has been taken by the employer of the perpetrator the case is resolved.
Document the complaint and outcome	Each individual complaint of SEA / SH will be documented and registered. The Project Management Unit (PMU) will compile numerical quarterly reports with no identifying information. All complaint records will be stored in a confidential and secure location.
Communicate with the survivor	The survivor will be provided ongoing feedback on the development and outcome of their case but especially when: • The complaint is received. • The case is escalated. • The verification process commences or when a determination is made that there is an insufficient basis to proceed. • The outcome of the verification process and any disciplinary action. • When disciplinary action has been.
Training for those receiving and resolving complaints	Anyone receiving or handling complaints of GBV will receive training so that they do not revictimize and retraumatise survivors or unintentionally cause them harm. Those who have been identified to receive complaints of GBV will complete training to: • Understand the gendered nature of SEA / SH, the GBV requirements in the Code of Conduct and the GBV pathway in the GM. • Have the skills to receive complaints of GBV. Those tasked with resolving incidents of SEA / SH will also complete training to develop their skills to receive, resolve and record complaints of GBV.

Implementation

The Project will recruit a Gender and GBV Specialist to lead the implementation of this Action Plan

Actions

Component	Subcomponent	Activity	Responsibility
Component 1: Prepare children to be ready to learn through ECE.	9 <u>Subcomponent 1.1:</u> 10 Enhancement of Existing ECE Centres.	Support recipients of grants to enhance existing ECE Centres to establish, review and implement child safeguarding procedures.	PMU, Gender and GBV Specialist.
		Support the strengthening of selection and recruitment systems for employees that screen for prior offences relating to child abuse and sexual assault.	PMU, Gender and GBV Specialist.
		Screen candidates for ECE employment for prior offences relating to child abuse and sexual assault.	ECE service provider.
		Strengthen registration and monitoring requirements to ensure individual ECE have and implement child protection policies.	PMU, Gender and GBV Specialist.
		Support the strengthening of governance mechanisms for the ECE to include monitoring systems to ensure adherence to the <i>Lukautim Pikinini Act</i> .	PMU, Gender and GBV Specialist.
		Individual ECE have rules and code of conducts to maintain respect among students.	ECE service provider.
	11 <u>Subcomponent 1.2:</u> 12 Establishment of Community Playgroups.	Establish procedures for the recruitment of community playgroup facilitators to screen for prior offences relating to child abuse and sexual assault.	PMU, Gender and GBV Specialist.
		Screen candidate for community playgroup facilitators for prior offences relating to child abuse and sexual assault.	Community Playgroup service provider.
		All community playgroup facilitators will also be required to sign a Code of Conduct that specifically prohibits SEA / SH and child abuse and exploitation.	Community Playgroup service provider.

		All community playgroup facilitators will also be required to complete an induction session on the SEA / SH and child abuse and exploitation.	Community Playgroup service provider.
Component 2: Support teachers to teach effectively.	13 <u>Subcomponent 2.2:</u> 14 In-service teacher training and ongoing support and <u>Subcomponent 2.3:</u> Teacher Diploma Upgrading.	Contractors, or institutions, responsible for education of teachers will be required to have Code of Conduct that prohibit employees sexually exploiting, abusing or harassing participant.	Training service providers.
		Teacher training will include training to adhere to the Behaviour Management Policy.	PMU, Gender and GBV Specialist.
		Training to counsellors assigned to ECE Centres to identify and respond to child abuse, and School-Related GBV.	PMU, Gender and GBV Specialist.
Component 3: Modernise the infrastructure and the management of the Education sector.	15 <u>Subcomponent 3.3:</u> 16 Needs-based investments in physical infrastructure for schools.	All Project Workers to sign a Code of Conduct that specifically prohibits SEA / SH.	Contractor.
		All Project Workers to complete an induction session on the SEA / SH.	Contractor.
		Design of infrastructure will be gender sensitive,	Contractor.
		Women will be represented during school decision-making that deal with the construction.	PMU, Gender and GBV Specialist.
Components 1, 2 and 3:		Community awareness will be conducted in locations of the ECE, and infrastructure works.	PMU, Gender and GBV Specialist.
GRM		Partner with the National Office of Child and Family Services to ensure the effective response to reports of SEA/SH and child abuse or exploitation	PMU, Gender and GBV Specialist.
		Ensure that individual ECE Centers who receive grants have a complaint mechanism to receive and resolve complaints of School-Related GBV and reports relating to child protection	PMU, Gender and GBV Specialist.

	Develop Project Grievance Mechanism (GM) pathway for reports of Project-Related SEA/SH and child abuse or exploitation.	PMU, Gender and GBV Specialist.
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ANNEX 7. TERMS OF REFERENCES (TORs) FOR E&S SPECIALISTS

TERMS OF REFERENCE
CONSULTING SERVICES
Environmental and Social Specialist

This document details the requirements related to the advertised contract.
 please refer to this content below in preparing your submission.

Project Overview

Project Overview		
Project Name	Learning Enhancement and Access Project (LEAP)	
Activity Reference Number (STEP)		
Agency Name	National Department of Education	
Country	Papua New Guinea	
Position Title/ Activity Description	Environmental and Social Specialist	
National	☒	

Project Background

Project Details		
Project Aim	The proposed Project will improve quality at early childhood education and prep-G2 levels in project-targeted province. The project will include four components: (i) Preparing children to be ready to learn through Early Childhood Education (ECE); (ii) Supporting teachers to teach effectively; (iii) Modernizing the infrastructure and the management of the Education sector; and (iv) Project management, monitoring & evaluation, and capacity-building. The Project will be implemented by the National Department of Education (NDoE) in coordination with Provincial Divisions of Education (PDoE) and church education agencies over five years starting in 2026.	
Project Length	2026 – 2030	
Project Location	Port Moresby, Southern Highlands Province, Morobe Province, New Ireland Province, and Gulf Province.	
Other Relevant Information	The Government of PNG (GoPNG) has requested financing from the World Bank, in the amount of US\$110 million for LEAP (the Project).	

	To facilitate effective design and implementation, a Project Preparation Grant (PPG), starting in 2025, will finance preparatory and implementation readiness activities for the Project (P505529). To assist with the preparation and implementation of the Project, NDoE is seeking a qualified and experienced Environmental and Social Officer to join the Project Management Unit. This assignment will be financed initially through the PPG, and based on satisfactory performance, approval of the LEAP Project and availability of financing, the contract may be extended until the Project's expected closing date of October 6, 2030.
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Contract Details

Details	
Objective	A PMU will be established within NDoE in 2025 to assist in managing the Project, and ensure that the World Bank's fiduciary, environmental and social risk management and reporting requirements, including monitoring and evaluation, are met throughout the implementation period. Key contracted staff will include a qualified Project Manager, a Procurement Specialist, a Financial Management Specialist, a Communications Specialist, and Environmental and Social (E&S) Specialist. It is anticipated that inputs from the E&S Specialist will be needed on a full-time basis. The primary function of the PMU is to assist the NDoE in ensuring satisfactory implementation of the Project, including coordination with other key stakeholders relevant to the implementation of Project activities. The primary functions of the PMU would be as follows: 1. Assist the NDoE in ensuring satisfactory implementation of the Project; 2. Help prepare the Project Operational Manual including obtaining 'no objection' from the World Bank prior to dissemination, and keep the document updated as necessary; 3. Serve as one of the key contact points for the World Bank with respect to the Project; 4. Overall responsibility for the Project implementation and ensuring compliance with World Bank Project requirements, including for all aspects of procurement, environmental and social risk management requirements, financial management, auditing, monitoring and evaluation, and reporting; 5. Coordinate with target Provinces to promote effective communication and ensure that relevant Project documents are submitted in a timely manner;

	6. Negotiate contracts for supply of goods, and services, for signing by NDoE; 7. Responsible for timely reporting requirements of the Project, i.e., Financial Reports, Audit Reports, Annual Work Plan and Budget, semi-annual Progress Reports, overseeing the updating of the Procurement Plan, ensuring the maintenance of Systematic Tracking of Exchanges in Procurement (STEP), and submission of required documents for annual audits; 8. Oversee the preparation of Withdrawal Applications to the World Bank in a timely manner to ensure prompt payment for goods and services; 9. Responsible for assisting the NDoE meeting the end targets as outlined in the Results Framework for the Project; and 10. Make periodic visits to Project areas and prepare back to office reports on Project implementation. The project will be implemented in accordance with World Bank Environmental and Social Framework (ESF) and PNG law. The ESF outlines ten environmental and social standards (ESSs) including i) Assessment and management of environmental and social risks and impacts; ii) Labor and working conditions; iii) Resource efficiency and pollution prevention and management; iv) Community health and safety; v) Land acquisition, restrictions on land use and involuntary resettlement; vi) Biodiversity conservation and sustainable management of living natural resources; vii) Indigenous peoples; viii) Cultural heritage; ix) Financial intermediaries; and x) Stakeholder engagement. The Environmental and Social Review Summary (ESRS) completed by the World Bank during project preparation, outlines the relevant ESSs for the project including key risks and management measures. Key environmental risks for the project include occupational health and safety hazards, generation of construction waste, dust, noise pollution, and potential for hazardous materials and waste, such as asbestos associated with renovation or construction of small-scale education and digital infrastructure; and e-waste associated with procurement of IT equipment. Key social risks associated with project include community health and safety risks, school related gender based violence (GBV) and sexual exploitation and abuse / sexual harassment relating to the project workforce; risks associated with land and land access for education and digital infrastructure; challenges with engaging and ensuring equitable project benefits for diverse indigenous peoples' groups and vulnerable
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	social groups (women, poor, disabled, elderly, isolated groups); social tensions, conflict and civil unrest within or between diverse indigenous communities resulting from real or perceived inequities; and labor and working conditions risks for project workers. The following will be prepared during preparation: • A rapid analysis of the borrower framework against the World Bank's ESSs relevant to project activities and risks. • a Stakeholder Engagement Plan • GBV Action Plan. • Environmental and Social Management Plan including a preliminary assessment of E&S risks/impacts and a process for screening, assessing and managing these risks during implementation • Environmental and Social Commitment Plan outlining material actions and measures to ensure compliance with the WB's ESF during implementation. • Draft E&S section of the Project Operations Manual As a member of the LEAP PMU, the E&S Specialist is required to adopt and implement these documents mentioned above within 30 days of project effectiveness and prepare subproject specific instruments as required in accordance with the ESCP.
Duration	Starting January 2025, for 12 months, renewable annually for up to six years based on satisfactory performance; availability of financing; and related approvals (through to October 6, 2030 the Project closing date)
Reporting	The E&S Specialist will be hired by the NDoE and will be posted in the Project Management Unit (PMU). The E&S Specialist will report to the Project Manager. The E&S Specialist is required to follow the relevant working hours, but depending on the business needs, the E&S Specialist may be requested to work extended hours. In a process that will be coordinated by the Project Manager, the performance of the E&S Specialist will be formally assessed at 6-month intervals in the first year and 12 month intervals thereafter by the Project Manager.

Contract Scope**Contract Goals and Outcomes**

The E&S Specialist, reporting to the Project Manager, will function as a core member of the PMU under NDoE and will ensure that environmental, social, and health and safety risks are managed in accordance with the requirements of the World Bank's ESF and GoPNG Law.

Specially the E&S Specialist will:

Project Preparation (within 30 days of appointment to role)

- Contribute to preparation of the project's ESCP, ESMF, GBV Action Plan, SEP and POM including collecting targeted secondary information, coordinating meetings and input from the PMU and other key stakeholders; reviewing and providing inputs of each document and tools (i.e. screening and reporting templates) for implementation; and leading public consultation and disclosure activities.
- Conduct stakeholder engagement and information disclosure activities during project implementation.

Early Project Implementation (within 30 days of project effectiveness)

- Adopt the project E&S instruments as outlined above and provide trainings to PMU members on the requirements of the instruments as outlined in the ESCP;
- Update of the project's Stakeholder Engagement Plan as required in close collaboration with the Risk Communication and Community Engagement Team including providing inputs for: i) specific stakeholder engagement plans/information disclosure strategies for each stakeholder group when finalizing the SEP; ii) strengthening measures for engaging with IP communities to allow for their effective participation in the design of project activities or mitigation measures that could affect them either positively or negatively; and
- Develop and implement an action plan for operationalizing the GM in close collaboration with the PMU Project coordinator including the development of clear grievance procedures; clear roles and responsibilities of staff/committees; provision of training; community awareness tools; accessible grievance uptake channels (online and offline, including telephone, text message, email, grievance boxes etc.); feedback processes; monitoring and reporting provisions; and specific requirements for addressing SEA/SH-related grievances.

Ongoing Project Implementation (throughout project implementation)

- Lead the implementation of the project's ESCP and associated instruments in accordance with the World Bank ESF and GoPNG legal requirements including:
 - Environmental screening, preparation and disclosure of site-specific instruments, consultation and information dissemination activities with relevant stakeholders;
 - Site-based environmental, safety and social monitoring. Address non-compliances and develop and confirm the implementation of corrective actions. Assist with the implementation of project investment opportunities that would improve performance;
 - Preparation of monthly and six-monthly monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project; and
 - Notification, reporting and management of incidents or accidents related to the Project which have, or are likely to have, a significant adverse effect on the environment, the affected communities, the public or workers.
- Oversee the implementation of the project's Stakeholder Engagement Plan in close collaboration with the Project coordinator the Risk Communication and Community Engagement team.
- Coordinate the implementation of the project's GM ensuring timely resolution of project related grievances.

- Participate in semi-annual Project Supervision missions, representing NDoE on environmental, safety and social aspects.
- Conduct other E&S related activities as required by the Project Manager, PMU.

Specific Deliverables of contract

List the specific deliverables or milestones of this contract in the table below.

Key Deliverables	Timing	KPI
Inputs into the Environmental and Social Commitment Plan, Environmental and Social Management Plan, GBV Action Plan, Stakeholder Engagement Plan (and Grievance Mechanism), and POM.	Ongoing	% of documents completed on time
Action plan for the GM and completion of outputs as per this plan.	Ongoing	% of documents completed on time
Activity/sub-project E&S screening and preparation of relevant instruments	Ongoing	% of documents completed on time
Site-based E&S monitoring reports	Ongoing	% of activities captured in report
6-monthly monitoring reports and incident investigation reports/corrective action plans (as required)	Ongoing	Time taken to complete activity

Evaluation Requirements

This section details the basis upon which selection of the successful candidate will be based.

Mandatory Criteria – These criteria must be met to be considered for this contract.

Mandatory Criteria	
Education	At least a bachelor's degree in any of these areas: Sociology, Anthropology, Applied Social Science, Environmental Science/Management or Natural Science/Social Impact Assessment or a related field.
Other e.g. professional membership	At least five years of work experience, including environmental impact assessment and an understanding of social impact assessment

Desirable Criteria – These criteria are requirements or qualities that are not mandatory but would be considered beneficial if they are met.

Other Criteria	Evaluation Points Allocated (x/100)
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Experience relevant to the Project	Prior work experience in World Bank/ADB/other international donor funded projects would be favorable	
Experience relevant to the Terms of Reference	Have a good understanding and knowledge of environmental management legislations and requirements in Papua New Guinea; Software & Computer skills: High Level Computer skills with Microsoft Office software especially MS word, excel spreadsheets, Power Point, Outlook etc. and ability to effectively use email; Communication skills: Excellent professional oral and written communication skills in English, including via email, audio/video conference, and face-to-face with Bank and Government officials; Organizational skills: Ability to work under pressure meeting project implementation timelines and deadlines; Site visit: Have strong willingness and capability to travel to the outer islands, as required; and Work Ethics: Proven high level of personal integrity and commitment to national and international professional work ethics and standards.	
Other	Click or tap here to enter text.	

Resources Provided

Provide an outline of items/resources the client will provide to enable delivery of the contract outcomes.

INPUTS	
Equipment (IT/Comms etc)	For the duration of the assignment, the consultant will be provided with a laptop; a mobile phone, internet and stationery
Office Space	For the duration of the assignment, the consultant will work and be located at the PMU Office of the NDoE in Port Moresby.

Selection Process

Regulatory Requirements

- The selection process will be conducted in accordance with the World Bank's Procurement Regulations for Borrowers.
- All procedures will comply with the relevant legal agreements and procurement plans specified for the project.

Evaluation Criteria

- The evaluation criteria will be clearly outlined in the Instructions to Consultants and will include factors such as technical expertise, relevant experience, and the quality of the proposal.
- Each criterion will have a specific weight, and a minimum passing quality score will be established.

Use of Interviews

- As part of the selection process, shortlisted candidates will be invited for interviews to further assess their suitability for the assignment.
- The interviews will focus on evaluating the candidates' understanding of the project requirements, their approach to the assignment, and their ability to deliver the expected outcomes.

Expected Timing

- The timeline for the selection process will be clearly stated, including key dates for the submission of proposals, evaluation, interviews, and the final selection.
- The process is expected to be completed within [specific timeframe], ensuring a timely commencement of the project activities.

**Papua New Guinea Learning Enhancement and Access Project
(PNG LEAP)**

Gender and Gender-Based Violence (GBV) Specialist

Port Moresby, Papua New Guinea

Terms of Reference

BACKGROUND

The Papua New Guinea Learning Enhancement and Access Program Project (2025-2031, \$102 million IDA financing with a \$10 million co-financing from the Government of Australia) aims to improve quality at early childhood education and prep-G2 levels in project-targeted provinces. This includes improving teacher training programs, broadening access to Early Childhood Education (ECE), and improving system management. Key elements involve implementing policies related to Early Childhood Education (ECE), school grants, teacher development, and ensuring effective coordination between national and provincial governments. Additionally, the operation focuses on upgrading educational resources, with a particular emphasis on pedagogical materials and basic school infrastructure to support improved learning outcomes.

The Project comprises the following four components:

Component 1 - Preparing children to be ready to learn through Early Childhood Education (ECE).

This component aims to prepare children for school through quality ECE by means of enhancing ECE centres and establishing community playgroups.

Component 2 - Supporting teachers to teach effectively. Phase 1 aims to improve teacher quality in four provinces by providing teaching and learning materials, in-service teacher training and ongoing support, and teacher diploma upgrading.

Component 3 - Modernising the infrastructure and management of the education sector. This component aims to equip the MoE with access to high-quality data, a national learning assessment system, and analytical tools to strengthen administration, ensure equity in resource allocation, and improve decision-making. The component will finance improvements in school infrastructure to improve learning and health.

Component 4 - Project management, monitoring and evaluation, and capacity-building. This component will finance project management support, including safeguards oversight, short-term technical assistance, grievance management, financial management, procurement, monitoring & evaluation (M&E), project management and support staff, goods, and operating costs.

The project activities will be implemented nationally. Others will be implemented in a select number of provinces based on selection criteria related to education outcomes, capacity and development partner support among others. The National Department of Education (NDoE) has selected one province per geographical region (Gulf, Morobe, New Ireland, and Southern Highlands) for components 1, 2, and subcomponent 3.3 (needs-based investments in physical infrastructure for schools).

ASSIGNMENT OBJECTIVES

NDoE requires a **Gender and GBV Specialist** to provide specialist support to ensure the effective design and implementation of gender and GBV strategies supported by the project.

The Gender and GBV Specialist will work closely with the Social Specialist.

SCOPE OF SERVICES

The main activities are to lead the update and implementation of the Project's Gender-Based Violence (GBV) Prevention and Response Action Plan which outlines strategies to mitigate and respond to risks of Project-Related GBV and School-Related GBV in ECE settings.

The **Gender and GBV Specialist** will lead the implementation of the following activities:

Component 1: Prepare Children to be Ready to Learn Through ECE

Subcomponent 1.1: Enhancement of Existing ECE Centres.

Support recipients of grants to enhance existing ECE Centres to establish, review and implement child safeguarding procedures.

Support the strengthening of selection and recruitment systems for employees that screen for prior offences relating to child abuse and sexual assault.

Strengthen registration and monitoring requirements to ensure individual ECE have and implement child protection policies.

Support the strengthening of governance mechanisms for the ECE to include monitoring systems to ensure adherence to the Lukautim Pikinini Act.

Subcomponent 1.2: Establishment of Community Playgroups

Establish procedures for the recruitment of community playgroup facilitators to screen for prior offences relating to child abuse and sexual assault.

Component 2: Support Teachers to Teach Effectively

Subcomponent 2.2: In-service teacher training and ongoing support and Subcomponent 2.3: Teacher Diploma Upgrading.

Teacher training will include training to adhere to the Behaviour Management Policy.

Training to counsellors assigned to ECE Centres to identify and respond to child abuse, and School-Related GBV.

Component 3: Modernise the Infrastructure and the Management of the Education Sector

Subcomponent 3.3: Needs-based Investments in Physical Infrastructure for Schools

Ensure women are represented during school decision-making that deal with the construction.

Components 1, 2 and 3

Community awareness will be conducted in locations of the ECE, and infrastructure works.

Project Grievance Mechanism

Partner with the National Office of Child and Family Services to ensure the effective response to reports of SEA/SH and child abuse or exploitation

Ensure that individual ECE Centres who receive grants have a complaint mechanism to receive and resolve complaints of School-Related GBV and reports relating to child protection

Develop Project Grievance Mechanism (GM) pathway for reports of Project-Related SEA/SH and child abuse or exploitation.

The **Gender and GBV Specialist** will support and ensure ECE service providers to:

Screen candidates for ECE employment for prior offences relating to child abuse and sexual assault.

Have rules and code of conducts to maintain respect among students.

The **Gender and GBV Specialist** will support and ensure Community Playgroup service providers to:

Ensure all community playgroup facilitators will also be required to sign a Code of Conduct that specifically prohibits SEA / SH and child abuse and exploitation.

Ensure all community playgroup facilitators will also be required to complete an induction session on the SEA / SH and child abuse and exploitation.

The **Gender and GBV Specialist** will support and ensure Training service providers responsible for education of teachers will be required to have Code of Conduct that prohibit employees sexually exploiting, abusing or harassing participant.

The **Gender and GBV Specialist** will support and ensure civil works contractors ensure:

All Project Workers to sign a Code of Conduct that specifically prohibits SEA / SH.

All Project Workers to complete an induction session on the SEA / SH.

Design of infrastructure will be gender sensitive.

KEY DELIVERABLES

- Updated GBV Prevention and Response Action Plan.
- ECE Centres child safeguarding procedures.
- ECE selection and recruitment system.
- ECE registration and monitoring requirements
- Community Playgroups selection and recruitment system
- Teacher training content.
- ECE counsellors training content.
- Women's representation in decision-making for ECE infrastructure.
- Community awareness.
- National Office of Child and Family Services and NDoE child protection complaint mechanism.
- ECE Centre child protection complaint mechanism
- Project GM pathway for reports of Project-Related SEA/SH and child abuse or exploitation.

Other outputs as needed / assigned.

TIMING AND INPUT

The Gender and GBV Specialist will be recruited by [insert] 2025 and provide [insert] months input over a [insert] year period with extensive travel to Project sites.

QUALIFICATIONS AND EXPERIENCE

- Degree in social science or related discipline.
- 10 years' experience in gender and / or addressing GBV, with at least 3 years of experience on addressing GBV within education projects or a transferable sector.
- Demonstrated experience delivering training and awareness on GBV and gender.
- Highly developed project and people management skills, including demonstrated cross-cultural communication skills.
- Experience in Papua New Guinea or other Melanesian countries.

PPO Community Engagement and E&S Officer TOR to be developed

ANNEX 8. LABOR MANAGEMENT PROCEDURES

Introduction

In accordance with the requirements of World Bank's Environmental and Social Standard 2 (ESS 2) on Labor and Working Conditions, these Labor Management Procedures (LMP) have been developed for Phase 1 of the Learning Enhancement and Access Project (LEAP, the Project). These LMP set out the ways in which the National Department of Education (NDoE) Project Management Unit (PMU, to be established) and the Provincial Project Offices (PPOs, to be established in the provinces) will manage all project workers in relation to the associated risks and impacts.

The objectives of the LMP are to: identify the different types of workers that are likely to be involved in the Project; identify, analyze and evaluate the labor-related risks and impacts for Project activities; and provide procedures to meet the requirements of ESS 2 on Labor and Working Conditions, ESS 4 on Community Health and Safety, and applicable national legislation.

These LMP are included as an Annex to the Environmental and Social Management Framework (ESMF) which is supported by the following environmental and social (E&S) instruments developed, or to be developed, to support management of the environmental and social aspects of the Project:

- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement Plan (SEP)
- Project Operational Manual (POM) (to be developed)

The LMP will be disclosed as part of the ESMF (dated January 2025) prior to Project Appraisal. Disclosure will include publication on the NDoE/Project website(s).

These LMP are a living document and will be reviewed and updated throughout implementation of the Project and at each phase of the MPA. The NDoE PMU will review and update the LMP as part of the ESMF (dated January 2025) within six months of the effective date of the Financing Agreement for the Project and submit the updated version(s) to the World Bank E&S Specialists for review and clearance. Updated versions will be disclosed on the NDoE/Project website(s).

Overview of Project Labor Requirements

The Project workforce is expected to be fairly large and geographically dispersed and will include direct workers (staff and consultants directly hired by the NDoE), contracted workers (employed by contracted third parties including consulting firms, construction companies and education service providers); primary supply workers (associated with suppliers of construction material); and community workers who provide labor as a contribution to the Project. All direct and contracted workers must be over 18 years old. Community workers under the age of 18 may be engaged but only under strict conditions. In accordance with ESS 2 para 8, civil servants working in connection with the Project will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement unless there has been an effective legal transfer of their employment or engagement to the Project. ESS 2 will not apply to such government civil servants, except for provision relating to protecting the Project workforce and occupational health and safety (OHS).

A summary of Project labor requirements, including the estimated number of workers and duration, is provided in Table 1.

Table 1 – Project Labor Requirements

Type of project workers	Applicability of LMP	Project components	Characteristics of project workers	Timing of labor requirements	Indicative number of workers
Direct workers - government People employed or engaged directly to work specifically in relation to the Project.	OHS issues, and child and forced labor only	All components	Existing workers involved in Project implementation.	Duration of project	Approximately 10-20 to be confirmed during Project implementation.
Direct workers – Other People employed or engaged directly to work specifically in relation to the Project	Full scope of LMP applies	All components	Consultants hired using Project funding and forming the Project Management Unit (PMU) and Provincial Project Offices (PPOs). Consultants hired on an ad-hoc basis to deliver technical advisory, training and capacity building activities.	Duration of project	Approximately 46 consultants consisting of 16 workers in the PMU and five in each of the six PPOs. Number of ad-hoc consultants to be confirmed but likely to be in the range of 10 to 30.
Contracted workers People employed or engaged by third party contractors to perform work related to core function of the Project, regardless of location.	Full scope of LMP applies	Components 1 and 3	Construction workers hired by contractors or subcontractors to complete small scale-civil works. Consultants employed by consulting firms that have been contracted by the Project.	Duration of small-scale civil works; however, each worker may only be required for several weeks or months. Intermittent throughout project duration.	Worker numbers will be reevaluated during implementation.

Primary supply workers People employed or engaged by the primary suppliers. Primary suppliers will typically be required for small-scale civil works activities to be supported by the Project.	OHS issues, and child and forced labor only	Components and 3	1	Workers engaged by local suppliers of construction materials and equipment.	Duration of construction of small-scale civil works.	To be determined during implementation.
Community workers	OHS issues, and child and forced labor only	Components and 3	1	Community facilitators that volunteer to provide ECE training within communities. Community volunteers that assist with small-scale civil works.	Duration of component 1 implementation. Duration of construction of small-scale civil works.	To be determined during implementation.

The exact number, skill sets, timing and disposition of required Project workers of all categories including PNG and outside country nationalities will be confirmed once implementation begins and activity designs are completed.

Assessment of Key Labor Risks

The key labor-related risks associated with the project are:

- Terms of employment are not consistent with national law or World Bank Standards.
- Workers suffer discrimination and lack of equal opportunity in employment.
- Risks of workplace accidents or emergencies.
- Use of child or forced labor.
- Sexual exploitation and abuse (SEA), sexual harassment (SH), gender-based violence (GBV) to workers and community from Project workforce
- Violence against children (VAC) from Project workforce.

The key labor risks and mitigation for addressing these risks are summarized in summarized in Table 2.

Table 2 - Key Labor Risks

Project activity	Project component	Key labor risks
General administration and implementation (Project co-ordination, hiring of consultants, monitoring and reporting, financial management, audits, environmental and social risk management, training, design, monitoring and evaluation, financial management, procurement, communications, and design/engineering oversight).	All Project Components	Terms of employment are not consistent with national labor laws or World Bank standards. Workers suffer discrimination and lack of equal opportunity in employment. Unsafe work environment and/or poor working conditions. Risk of travel-related incidents when visiting activity sites and provincial offices, including motor vehicle accidents, and boating accidents. Risk of psychological distress, fatigue, and stigma due to the nature of their work. Risk of exposure to (and spread of) communicable disease through travel between provinces when visiting subproject sites and provincial offices. Risk of gender-based violence, sexual harassment, sexual exploitation and abuse, and other forms of abuse. Occupational health and safety. Exposure to construction-site related risks when visiting activities under construction (see following row).
Construction associated with small-scale civil works.	Components 1 and 3	Terms of employment (employment period, working hours, remuneration, tax and insurance payments etc.) are not secured by contractual agreements and are not consistent with national labor laws or World Bank standards. Workers suffer discrimination and lack of equal opportunity in employment. Risks of workplace accidents, particularly when operating construction equipment, when working at height, and when handling heavy equipment and materials. Risks from exposure to hazardous substances (dust, cement, chemicals used in construction, etc., asbestos in demolition debris) Use of child or forced labor that contravenes national labor laws, World Bank standards, and international conventions ratified by PNG. Conflicts between workers and communities. SEA/SH or GBV of workers or to the community from workers. Violence against children risks from workers.

Transportation construction equipment.	of materials,	Components 1 and 3	Road traffic accidents exposing workers to hazardous materials. Risk of travel-related incidents when transporting materials and equipment including motor vehicle accidents and boating accidents. Risks of accidents when handling heavy equipment and materials. Risk of exposure to (and spread of) communicable diseases through travel.
Use of community workers		Components 1 and 3	Unsafe work environment and/or poor working conditions. Use of child or forced labor. SEA/SH or GBV to the community from workers. Violence against children (VAC) risks.

Overview of Labor and OHS Legislation

Key PNG labor and OHS legislation

The **Constitution of the Independent State of Papua New Guinea** was adopted in 1975 and contains several relevant articles. It guarantees equality of citizens, freedom of assembly and association, and freedom from inhuman treatment and forced labor. The **Employment Act of 1978** is Papua New Guinea's (PNG's) main piece of labor legislation which regulates terms and conditions of employment. The **Employment Regulation of 1980**, amended in 2006, operationalizes the Employment Act. Employment of non-citizens is regulated by both the Employment Act and the **Employment of Non-citizens Act 2007**. The **Industrial Relations Act 1962** regulates freedom of association, collective bargaining and industrial relations. The **Industrial Safety, Health, and Welfare Act 1961**, amended in 2016, outlines basic OHS requirements. Other employment issues are governed by about a dozen other Acts. PNG's labor legislation is a largely outdated labor law framework and is not well aligned with many of the ILO Conventions ratified by PNG. The ILO has therefore been providing technical input into a review of the Employment Act and the Industrial Relations Act 1962. In 2014, the Employment Relations Bill, which is an amalgam of the two Acts, was read in Parliament. It has not yet become law.

International Treaties

PNG supports several international treaties with labor related provisions. Most importantly, as a member of the ILO, PNG has ratified several ILO Conventions including the eight Fundamental Conventions and 16 other Conventions. Other conventions include Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), Convention on the Rights of Persons with Disabilities (CRPD), and United Nations Convention on the Rights of the Child (CRC). However, PNG has not ratified the ILO Conventions dealing with OHS (ILO Occupational Safety and Health Convention, 1981 (No. 155) and the ILO Safety and Health in Construction Convention, 1988 (No.167)), nor the ILO Occupational Health Services Convention (No. 161). The ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) has also found inconsistencies between PNG's labor legislation and the Fundamental Conventions ratified by PNG.

Key NDOE policies and procedures

DoE is guided by the Employment Act 1978 & Employment regulation 1980. NDoE is guided by the GoPNG declaration of 16 years as the minimum age for admission to employment or work. NDoE addresses grievances through relevant divisions based on their nature, ensuring resolution within their jurisdiction, while unresolved issues can be escalated to the Ombudsman Commission, Public Solicitor, or other complaints mechanisms. NDoE ensures that every engaged contractor prepares and implements OHS plans accordingly as per the requirement of their condition of contract. In schools, the WaSH in School Policy 2024 – 2028 is followed.

Brief gap analysis against ESS2 relevant to the Project

The Employment Act is consistent with ESS 2 in many areas but is outdated. In contrast to national legislation, ESS 2 requires written LMP for each project which addresses the way the ESS2 applies to different categories of workers. This is not required by national legislation. In some other areas, the requirements of the ESS 2 are more far reaching those of the Employment Act. These include provisions on equal opportunity and fair treatment irrespective of personal characteristics where the ESS 2 does not list specific personal characteristics but more generally asserts that discrimination must not be made based on *“personal characteristics unrelated to inherent job requirements”*. Moreover, ESS 2 explicitly refers to discriminatory treatment of migrant workers which national legislation does not. In terms of the minimum age for children to work, ESS 2 does not allow children under the age of 14 to be employed in any form of work in contrast to the national legislation which permits children from the age of 11 to work under certain conditions. There are limited provisions for GMs in labor disputes and no stipulations regarding the introduction of GMs in workplaces. Labour laws also do not apply to workers in the informal sector, which account for an estimated 84 percent of the employed persons in the country. Labor legislation applies only to the formal economy (not community workers) and hence only to a small proportion of PNG’s labor force.

Gap filling measures

- Contractors engaged on the small-scale civil construction works will be required to comply with OHS procedures set out in this LMP, the ECE and Infrastructure Grant Manuals (to be developed), and/or any other site specific environmental and social risk management instrument prepared for the Project.
- The minimum age for all contracted Project workers is 18 years of age.
- A GM for all direct and contracted workers to raise workplace concerns has been developed as part of these LMP and will be operationalized, as per ESS 2.
- OHS procedures, minimum working ages, and non-discrimination policies will also apply to community workers.

Project-related Policies and Procedures

General Applicable Procedures

The NDoE, PPOs, grantees, and contractors will apply the following guidelines in accordance with PNG labor laws and the World Bank ESS 2 when dealing with workers:

- NDoE, PPOs, grantees and contractors will provide job / employment contracts with clear terms and conditions including rights related to hours of work, wages, overtime, compensation and benefits, annual holiday and sick leave, maternity leave and family leave.

- NDoE and PPOs will ensure compliance with the Code of Conduct included in this LMP which will be applicable for direct (other), contracted, primary supply, and community workers. Direct workers (government) working in connection with the Project will be managed in accordance with the Public Service Code of Conduct.
- There will be no discrimination with respect to any aspects of the employment relationship, such as: recruitment and hiring; compensation (including wages and benefits; working conditions and terms of employment; access to training; job assignment; promotion; termination of employment or retirement; or disciplinary practices).
- Harassment, intimidation and/or exploitation will be strictly prohibited and addressed appropriately should it occur.
- Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.
- Vulnerable Project workers will be provided with special protection.
- NDoE, PPOs, grantees and retained contractors will ensure no person under the age of 18 shall be employed on the Project. Age verification of all workers will be conducted by the grantees and/or contractors.
- Community workers between the ages of 14 and 18 years may be used. However, a child over the minimum age (14) and under the age of 18 will only be engaged under strict conditions including a risk assessment, monitoring, and restrictions on engaging in work which is hazardous or interferes with the child's health, wellbeing or development.
- NDoE and PPOs will recruit contractors and labor locally to the extent that they are available and appropriately qualified.
- Workers shall be recruited voluntarily, and no worker is forced or coerced into work.
- NDoE and PPOs will supervise and monitor to ensure compliance with the above requirements.
- All workers, including community workers, will be made aware of the Worker's GM to raise work related grievances, including any sensitive and serious grievances on GBV, SEA/SH and VAC.

Occupational Health and Safety Procedures

The NDoE and PPO's will ensure that effective methods are put in place for responding to the identified hazards and risks, establishing priorities for acting and evaluating outcomes.

All Project parties who employ or engage Project workers will actively collaborate and consult with Project workers in promoting understanding of, and methods for, implementation of OHS requirements, as well as in providing information to Project workers, training on OHS, and provision of personal protective equipment (PPE) (as needed) without expense to the Project workers.

Project workers will receive training during induction, and thereafter on a regular basis and when changes are made in the workplace, with records of the training kept on file. Training will cover relevant aspects of OHS associated with daily work, including the ability to stop work without retaliation in situations of imminent danger.

OHS management for Contractors will be addressed in their contracts and in the site-specific instruments (Environmental and Social Management Plans (ESMPs), Environmental and Social Codes of Practice (ESCOP)) to be prepared during implementation. Contractors will be required to prepare and implement

Contractor ESMPs prior to commencing works. Contractors will conduct training for all workers on their C-ESMP and on OHS matters. Workers are to be provided with appropriate PPE suitable for civil work. This may include safety boots, helmets, gloves, protective clothes, goggles and ear protection (as appropriate) at no cost to the workers. The Contractor will provide workers with potable water supplies, first aid facilities, a toilet and hand washing facilities at all works sites.

Workers are to be covered by workers' compensation as per the requirements of the Workers Compensation Act 1978.

Contractor Management Procedures

The objective of this procedure is to ensure that NDoE and PPOs have contractual power to administer oversight and action against contractors for non-compliance with this LMP.

- NDoE and PPOs will make available relevant documentation to inform the contractor about requirements for effective implementation of the LMP.
- NDoE and PPOs will include the provisions of the ESMF, LMP, site specific ESMP(s)/ESCOP(s) (if relevant), and other relevant documents into the grant agreements and the specification section of the bidding documents. The contractors will be required to comply with these specifications.
- Labor management records and reports compiled by contractors/third parties will include:
 - A representative sample of employment contracts or arrangements between third parties and contracted workers.
 - Records relating to grievances received and their resolution.
 - Reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions.
 - Records relating to incidents of non-compliance with PNG law.
 - Records of training provided for contracted workers to explain labor and working conditions and OHS for the Project.
- NDoE and PPO's will monitor the contractor's E&S performance during regular site visits utilizing contractor reporting or external monitoring/supervision consultants where available. Where appropriate, NDoE may withhold contractor's payment or apply other contractual remedies as appropriate until corrective action(s) is/are implemented on significant non-compliance with the LMP, such as failure to notify NDoE of incidents and accidents.

Procedures for Primary Suppliers

The objective of the procedure is to ensure that labor-related risks, especially child and forced labor as well as serious safety issues to the project from primary supply workers are managed. NDoE, PPOs, grantees and all contractors will undertake the following measures:

- Procure supplies from legally constituted suppliers.
- To the extent feasible, conduct due diligence to ensure that primary suppliers conduct age verifications, employ workers without any force or coercion, and maintain basic OHS systems.

Procedures for Community Workers

Community workers to be engaged to assist in Project delivery may include facilitators that volunteer to provide ECE training within communities or volunteers that assist with the small-scale civil works. Community Workers will be managed through ECE grant and infrastructure grant manuals which will be developed during implementation. The PPOs will also provide technical support and oversight of the implementation of grants at the province level.

The PPOs will make reasonable efforts to ascertain that organizations and contractors that engage community workers are legitimate and reliable entities and have in place LMPs applicable to the Project that will allow them to operate in accordance with the requirements of ESS 2.

The NDoE and PPOs will incorporate the requirements of ESS 2 into contractual and grant agreements, together with appropriate noncompliance remedies. In the case of subcontracting, the NDoE and PPOs will require third parties to include equivalent requirements and noncompliance remedies in their contractual agreements with subcontractors.

The PPOs will manage and monitor the performance of organizations and contractors in relation to community workers, focusing on compliance by such third parties with their contractual agreements (obligations, representations, and warranties). This will include labor management records and reports compiled by contractors which include:

- copies of agreements or arrangements between third parties and community workers, including community workers, including age verification.
- records relating to grievances received and their resolution.
- reports relating to safety inspections, including fatalities and incidents, and implementation of corrective actions.
- records relating to incidents of non-compliance with PNG law.
- records of training provided for community workers to explain labor and working conditions and OHS for the Project.

Institutional Arrangement for Implementation of the LMP

NDoE will carry the main responsibility for the implementation and monitoring of the LMP, with support from the PPOs. The NDoE and PPOs will identify subproject activities, prepare grant agreements and bidding and contract documents, as well as procure contractors. The PMU and PPOs will be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works (as relevant). The PMU and PPOs will ensure that LMP are integrated into the specification section of the grant agreements, contracts and bidding documents, and the procurement contracts and will undertake training of workers.

Grievance Mechanism

There will be a specific Worker's Grievance Mechanism (Worker's GM) for project workers as per the process outlined below. This considers culturally appropriate ways of handling the concerns of direct, contracted, and community workers. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues. Workers will be informed about the relevant Worker's GM upon their recruitment and their right to redress, confidentiality and protection against any reprisals from the employer will be stated in the contract.

Routine Grievances

The process for the Worker's GM is as follows:

1. The complainant may report their grievance in person, by phone, text message, mail or email (including anonymously if required) to the PPO Community Engagement and E&S Officer(s) as the initial focal point for information and raising grievances. The PPO Community Engagement and E&S Officer(s) aims to address and resolve the complaint and inform the complainant within 15 days. For complaints that are satisfactorily resolved at this stage, the incident and resultant resolution will be logged and reported to the NDoE E&S Specialist.
2. If the complainant is not satisfied, the PPO Community Engagement and E&S Officer(s) will refer the aggrieved party to the NDoE PMU E&S Specialist. The NDoE PMU E&S Specialist endeavours to address and resolve the complaint and inform the complainant within 15 days. For complaints that are satisfactorily resolved, the incident and resultant resolution will be logged by the NDoE PMU E&S Specialist. Where the complaint is not resolved, the NDoE PMU E&S Specialist will refer to the NDoE PMU Project Manager for further action or resolution.
3. As a third step, if the matter remains unresolved, or the complainant is not satisfied with the outcome, the NDoE Project Manager will refer the matter to the Project Steering Committee for a resolution, which will aim to resolve the grievance in 21 days or less. The NDoE PMU E&S Specialist will log details of issue and resultant resolution status.
4. If the complaint remains unresolved or the complainant is dissatisfied with the outcome proposed by the Project Steering Committee, the complainant may refer the matter to the appropriate legal or judicial authority, at the complainant's own expense. A decision of the Court will be final.

The Worker's GM is not an alternative or substitute for the legal system for receiving and handling grievances and will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures. While all employees always have the right to access the legal system, the purpose of establishing a Worker's GM is to provide an accessible and practical means to mediate and seek appropriate solutions, wherever possible.

Serious Grievances

In case a worker experiences serious mistreatment such as GBV/SEA/SH, intimidation, violence, discrimination or injustice at the workplace, the worker may raise the case, verbally or in writing directly to the NDoE. The NDoE will immediately investigate the case respecting confidentiality and anonymity of the worker.

Upon Project effectiveness, the NDoE will designate a Focal Person or Persons for Serious Grievances. These Focal Persons will receive training in investigating serious grievances, including complaints of GBV/SEA/SH so that they do not revictimize and retraumatize survivors or unintentionally cause them harm, and on relevant laws and World Bank standards including the rights of people who file a grievance. In the case of a serious grievance against a worker, the NDoE or PPO may take disciplinary action against a Project Worker for a breach of the Code of Conduct. NDoE and the World Bank will jointly develop culturally sensitive and locally appropriate roles and responsibilities, and procedures.

In case a direct worker or civil servant has a serious grievance, the staff may directly contact verbally or in writing the Focal Person for Serious Grievances.

All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.

ATTACHMENT 1 - TEMPLATE ON CONTRACT FOR CODE OF CONDUCT

We are the Grantee/Contractor/Employer, [enter name of Grantee/Contractor/Employer]. We have signed a grant agreement/contract with [NDoE/PPO] for [enter description of the Works]. These Works will be carried out at [enter the Site and other locations where the Works will be carried out]. Our grant agreement/contract/employment conditions require us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation and abuse, sexual harassment, gender-based violence, and violence against children.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “Grantee/Contractor/Employer’s Personnel” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Grantee/Contractor/Employer’s Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Grantee/Contractor/Employer’s Personnel shall:

1. Carry out his/her duties competently and diligently.
2. Comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Grantee/Contractor’s Personnel and any other person;
3. Maintain a safe working environment including by:
 - a) ensuring that workplaces, machinery, equipment and processes under each person’s control are safe and without risk to health;
 - b) wearing required personal protective equipment;
 - c) using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d) following applicable emergency operating procedures.
4. Report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health;
5. Treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers, or children;
6. Not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Grantee/Contractor’s or Employer’s Personnel;
7. Not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In World Bank financed projects/operations, sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non- consulting services is used to extract sexual gain;

8. Not engage in Rape, which means physically forced or otherwise coerced penetration—even if slight —of the vagina, anus, or mouth with a penis or other body part. It also includes penetration of the vagina or anus with an object. Rape includes marital or intimate partner rape and anal rape/sodomy. The attempt to do so is known as attempted rape. Rape of a person by two or more perpetrators is known as gang rape;
9. Not engage in Sexual Assault, which means any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia, breasts, or buttocks, do not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. Complete relevant training courses that will be provided related to the environmental and social aspects of the Grant Agreement/Contract, including on health and safety matters, and sexual exploitation and abuse, sexual harassment, gender-based violence, and violence against children;
11. Report violations of this Code of Conduct.
12. Not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the Project Grievance Mechanism.

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly using the Project Grievance Mechanism process.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Grantee/Contractor/Employer's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR GRANTEE/CONTRACTOR/EMPLOYER'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I understand. I understand that if I have any questions about this Code of Conduct, I can contact *[enter name of Grantee/Contractor/Employer's contact person with relevant experience in handling gender-based violence]* requesting an explanation.

Name of Grantee/Contractor/Employer's Personnel: [insert name]

Signature: _____

Date: (day month year): _____

ATTACHMENT 2 – ATTACHMENT TO THE CODE OF CONDUCT FORM

BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviors.

(1) Examples of sexual exploitation and abuse include, but are not limited to:

- A Grantee/Contractor's Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g. cooking and cleaning) in exchange for sex.
- A Grantee/Contractor's Personnel that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A Grantee/Contractor's Personnel rapes, attempts to rape, or otherwise sexually assaults a member of the community.
- A Grantee/Contractor's Personnel denies a person access to the Site unless he/she performs a sexual favor.
- A Grantee/Contractor's Personnel tells a person applying for employment under the Grant Agreement/Contract that he/she will only hire him/her if he/she has sex with him/her.

(2) Examples of sexual harassment in a work context

- Grantee/Contractor's Personnel comment on the appearance of another Grantee/Contractor's Personnel (either positive or negative) and sexual desirability.
- When a Grantee/Contractor's Personnel complains about comments made by another Grantee/Contractor's Personnel on his/her appearance, the other Grantee/Contractor's Personnel comment that he/she is "asking for it" because of how he/she dresses.
- Unwelcome touching of a Grantee/Contractor's or Employer's Personnel by another Grantee/Contractor's Personnel.
- A Grantee/Contractor's Personnel tells another Grantee/Contractor's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.