

**Additional Financing of
Bhutan Human Capital Recovery and Resilience
Program (HCRRP - P179184)
Royal Government of Bhutan (RGoB)**

Program for Results (PforR)

**ENVIRONMENTAL AND SOCIAL SYSTEMS
ASSESSMENT (ESSA)**

May 2023

ACRONYMS AND ABBREVIATIONS

| | |
|-------|---|
| ADB | Asian Development Bank |
| BBP | Build Bhutan Project |
| BHU | Basic Health Units |
| CPF | Country Partnership Framework |
| CSI | Cottage and Small Industries |
| DEO | District Education Officer |
| DHO | District Health Officer |
| DLI | Disbursement-linked indicator |
| DoEHR | Department of Employment and Human Resources, MoLHR |
| EACD | Environmental Assessment and Compliance Division |
| ECCD | Early Childhood Care and Development |
| E&S | Environmental & Social |
| ESF | Environmental and Social Framework |
| ESSA | Environmental and Social Systems Assessment |
| FYP | Five Year Plan |
| GRM/S | Grievance Redress Mechanism/System |
| HCF | Health Care Facilities |
| IA | Implementing Agency |
| IEC | Information, Education and Communication |
| LMS | Learning Management System |
| MOESD | Ministry of Education and Skills Development |
| MOLHR | Ministry of Labor and Human Resources |
| NCWC | National Commission for Women and Children |
| NEC | National Environmental Commission |
| NELDS | National Early Learning and Development Standards |
| NER | New Educational Roadmap |
| NKRA | National Key Results Area |
| NSB | National Statistics Bureau |
| NSDP | National Skills development Plan |
| NST | National Skills Training |
| PAP | Program Action Plan |
| PDO | Program Development Objective |
| PforR | Program for Results |
| PIU | Program Implementing Unit |
| PMU | Program Management Unit |
| PSGRD | Public Services and Grievance Redressal Division |
| RA | Result Areas |
| RBP | Royal Bhutan Police |
| RENEW | Respect, Educate, Nurture and Empower Women |
| RGoB | Royal Government of Bhutan |
| SDP | Skills Development Plan |
| SEA | Sexual Exploitation and Abuse |
| SEN | Special Education Needs |
| SH | Sexual Harassment |
| SWOT | Strengths-Weaknesses- Opportunities-and Threats |
| TEO | Town Education Officer |
| TTI | Technical Training Institute |
| TVET | Technical and Vocational Education and Training |
| YELP | Youth Employment and Livelihood Program |

EXECUTIVE SUMMARY

The parent Bhutan Human Capital Recovery and Resilience Program is being financed using the Program for Result (PforR) instrument to strengthen implementation of selected activities of two programs of the Royal Government of Bhutan (RGoB). The goal of this PforR program is to accelerate economic recovery that fall primarily under National Key Results Areas (NKRA) 7 and 11 on improved access and quality of education and improved employment outcomes under 12th Five Year Plan (FYP). This includes programs introduced to mitigate the impacts of COVID-19 and supports the implementation and improves human capital outcomes. NKRA 7 and 11 of the 12th FYP are directly related to the Program objectives, since they support results in areas of education, skills, and employment. The Program aims to (i) ensure a strong foundation for lifecycle approach to boost future human capital accumulation, (ii) support economic and human capital recovery and (iii) increase human capital resilience during post-COVID-19 pandemic.

The Additional Financing (AF) of the parent Program will be a combination of PforR and IPF investment models. The PforR will expand the scope of the parent Program activities and IPF will support implementation. It will include three major results areas: (i) expanding ECCD access, (ii) reducing digital divide, and (iii) improving safe water and sanitation services.

To support the RGoB's commitment to achieving 50 percent enrollment in ECCD by 2025 and improving ECCD service quality under the 12th FYP, the proposed AF will support the Ministry of Education and Skills Development (MoESD) in expanding quality ECCD in rural and low population areas.

Specifically, the AF will finance the rehabilitation/construction of 60 ECCD centers (the Parent Program supports 120, excluding the 60 under AF), with water and sanitation facilities designed for 3–5-year-olds in selected rural and low populated areas. The rehabilitation work will include converting existing community facilities or health centers (which are rarely used by the communities) into functional ECCD centers. Screening will be done to ascertain if there are encroachers in these facilities who will be relocated giving compensation for the loss of livelihood and living, if any.

To complement the reduction of digital divide efforts under the parent project, the AF will provide local connectivity in rural schools to support implementation of digital curriculum, which is currently unavailable. Under the HCRRP, ICT for Education activities include development of digital curriculum, teacher training, and provision of digital equipment. Specifically, the AF support will expand the internet coverage from school administrative offices into the classrooms by installing fiber-optic internet access connected through the local area network system.

The proposed AF will support the MoESD in improving safe sanitation services by rehabilitating and constructing WASH facilities in selected 20 SEN schools and 40 primary and secondary schools in both rural and urban areas. Specifically, the AF will upgrade dry/pour flush toilets to flush toilets for girls and boys and build new toilets for girls. This will improve health and hygiene of students and teachers, as well as lift the barrier for children with disabilities, which contribute to better students' attendance and learning.

The proposed AF IPF Component's main activities will include: (i) supporting overall project management and coordination; (ii) strengthening implementation capacity by hiring Technical Assistants (Project Manager, Project Coordinator, Financial Management and WASH monitoring and evaluation), conducting training/workshops, including project management, fiduciary and M&E, (iii)

provision of relevant goods (office equipment for central and Dzongkhag levels) for improving the quality of service delivery, and (iv) strengthening monitoring and evaluation of project progress of outcomes to execute a results-based financing (e.g. third party verification).

The Environmental and Social System Assessment (ESSA) for the parent Program was disclosed. This current ESSA is an update of the parent ESSA and covers changes of the Implementation Agencies (MoESD only instead of both MoESD and Ministry Labour and Human Resources), inclusion of minor civil works of ECCD center construction, WASH facilities in selected school etc. In accordance with the World Bank's Policy/Directive for Program for Results (PforR), the World Bank has conducted an ESSA of Bhutan's existing environmental and social management systems for the higher education and training/skills sector. This includes assessment of the national legal, regulatory, and institutional framework used to address potential environmental and social impacts of the PforR operation. The overarching objective of the ESSA is to assess the adequacy of the RGoB's system to ensure that the risks and impacts of the Program activities are identified and mitigated, and to strengthen systems and build capacity to deliver the PforR in a sustainable manner, if necessary.

The ESSA analysis focused on the Bank financed PforR operation, which carves out specific boundaries of intervention within the wider RGoB's NKRA 7 and 11 of the 12th FYP 2018-2023. The ESSA analyzed the environmental and social (E&S) risks and impacts associated with the Program to determine applicability for the six Core Principles outlined in the Policy and ensure consistency with those that apply. The gaps with the Policy, was considered on two levels: (i) the system as written in laws, regulation, procedures and applied in practice; and (ii) the capacity of Program institutions to effectively implement the system as demonstrated by performance thus far.

The PforR would support Bhutan's national goals of improved human capital outcomes for economic productivity and growth through supporting the implementation of "Improving Quality of Education and Skills" and "Productive and Gainful Employment" NKRAs under the 12th FYP including associated COVID-19 recovery programs. Based on the assessment and stakeholder consultations, the ESSA determined that the following three of the six Core Principles apply to the Program.

Core Principle 1

Program E&S management systems are designed to (a) promote E&S sustainability in the Program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision-making relating to a Program's E&S effects.

The analysis for the ESSA found this Core Principle to be relevant for the Program, where an established system/regulatory framework within the IAs to commit resources and implement actions are necessary for effective E&S management. The Program will include construction of small scale ECCD centers and WASH facilities in school none of which will have significant ES impacts. The country has well-defined legal/regulatory systems for safeguarding the environment and the affected communities where NEC is the apex body addressing E&S matters. The interventions are unlikely to have any severe adverse environmental and social impacts. The environmental and social risks associated with the Program is Low and these fall under the "**Green Category**" and do not demand environmental clearance. Nevertheless, the ESSA concluded that the IAs have a scope of recruiting

E&S Specialists to fill up the gap that exists between the IAs and NEC/EACD in monitoring program related E&S management at the field level.

Core Principle 3

Program E&S management systems are designed to protect public and worker safety against the potential risks associated with (a) the construction and/or operation of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.

The principle applies in terms of the risks related to the health and safety of the workers, trainees and students and the community in the near vicinity during implementation of the training program. There is no tangible threat to health and safety on the trainees, students and the local community as the environmental threat footprint is very small and the risk rating is LOW. Whatever little threat exists in terms of e-waste and COVID 19 related wastes (PPE, mask, gloves etc.), these could be effectively managed. However, safety of ECCD students and facilitators will need to be ensured through adequate water supply, cleanliness of toilets and WASH facilities, providing menstrual hygiene facilities and universal access design principle.

Core Principle 5

Program E&S systems give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to the needs or concerns of vulnerable groups.

This Core Principle is applicable as the Program will directly support activities in areas where there are vulnerable groups, particularly women and children from the remote and inaccessible areas that are identifiable under the Bank Policy and who have a share in the program benefits. ESSA findings indicate that there are adequate and relevant legal and policy frameworks as well as government commitment to gender and social inclusion in the Skill development, employment, entrepreneurship and alike. There is still a risk of exclusion of the vulnerable groups from program benefits due to various factors: lack of information and awareness among the vulnerable groups, remoteness, and insufficient financial and human resources to reach the vulnerable group. A clear strategy to ensure adequate information dissemination, communication and engagement with various stakeholders including IPs and other vulnerable groups through Information, Education and Communication (IEC) needs strengthening.

In the present system of RGoB, all environmental and social assessments fall under the Environmental Assessment and Compliance Division (EACD) under the National Environmental Commission (NEC), which is an autonomous agency. The interventions of the program are unlikely to have any negative environmental or social impact. The environmental and social risks associated with the program is **LOW** and fall under the “**Green Category**” that does not demand environmental clearance. However, there exists certain gaps between the IAs and NEC /EACD during implementation of the program that could be addressed through employing environmental and social specialists by the IAs for the program to monitor compliances at the field level.

In terms of *Gender Based Violence (GBV)*, an individual may also choose to report to the Royal Bhutan Police, the National Commission for Women and Children (NCWC), health or counselling services or any relevant Civil Society Organization. Walk-in complaints, reporting by telephone and complaints through the Toll-Free Helplines of RBP (113) and NCWC (1098) are the ways by which individuals can lodge complaints on sexual harassment that occur in any kind of setting (at homes, schools, institutions, shelters, public places, workplaces, etc.).

Key Actions: Based on the analysis, the ESSA identified the following key actions in order to ensure that the Program interventions are aligned with the relevant Core Principles 1, 3 and 5 for improved E&S due diligence:

| Objectives and Issues | Recommended Measures | Actions taken |
|--|---|--|
| Inclusion of E&S Specialists/Focal points at the Implementing Agencies (IAs). | Designate/ Assign Environmental and Social Consultants/Focal Point (with ES experience and background) for the Program. Related costs should be arranged from the Program budget. | ES Focal points assigned under the original Program would cover the work under AF. |
| Citizen Engagement (CE) and Stakeholder Engagement | The IA would appoint the ES focal point to look after communication issues. He/she will work with the Civil Society Organizations (CSOs) as directed by the IA and create citizen consensus on the program and communicate citizen's input to the IAs, thus closing the feedback loop. He/she will also assist IA in identifying and engaging various stakeholders, whenever necessary. Related cost should be arranged from the program budget. | ES focal point above will look after communication issues. |
| Grievance Redress Mechanism (GRM) including addressing GBV issue | Use existing Grievance Redress Mechanism (GRM) including addressing GBV Issues. | Existing RGoB GRM would be used for AF. |
| Strengthening of institutional capacity for safeguards management for the IAs | The MoESD PMU/PIU will implement a program following PforR for the first time. Since the ministry would oversee the activities of E&S management of the program through their PMU/PIU, capacity building (through training on E&S management) of the personnel in the IAs is a necessity. Training for ES personnel will be provided by the Bank if requested | Training on ES provided by WB ES team in person. Further training would be organized if necessary. |
| Actions at the TTIs and ECCD centers to offset the adverse effects of COVID-19 | To offset the adverse effects of COVID-19 during academic session/training period, the training institutes and ECCD centers must ensure physical distancing, use of PPE including gloves and mask by the trainers and the trainees alike. To offset space limitation, the training institutes/ECCD centers could run classes in a number of shifts (morning, noon, and afternoon). This needs to be weighed against availability of instructors and support staffs and overhead cost incurred in the process. MoESD IA decision in this regard would guide the TTIs and ECCD centers. | COVID protocols would be followed |
| ECCD Construction and WASH Facility Design | ECCD renovation and construction should follow good engineering practices including OHS. WASH Facility should be designed keeping in mind water requirement as well as adequacy of water sources. The water quality should be tested periodically against international standards. Toilets should be designed with universal accessibility features and maintained in a clean manner. | Design of ECCD centers and WASH Facilities should include the recommended measures |

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Introduction and Background

The parent and the Additional Financing of **Bhutan Human Capital Recovery and Resilience Project (HCRRP)** is focused on supporting Bhutan's national goals of improved human capital outcomes for economic productivity and growth. It would do this through supporting the implementation of two National Key Result Areas (NKRA) under the 12th Five Year Plan (FYP) entailing "Improving Quality of Education and Skills" and "Productive and Gainful Employment" including associated COVID-19 recovery programs. It is pertinent to note that the RGoB follows a five-year socio-economic development planning cycle with FYPs articulating the socio-economic development priorities and Program to be implemented.

The Program is in tandem with CPF FY 2021–24 (Report No. 154927-BT) and would support two of the strategic focus areas-human capital and resilience. The project would promote investments in human capital and skills for both future and current generations with attention to ensuring utilization of accumulated human capital through employment. Support to recovery of employment after COVID-19 would also contribute to improving the ability of households to avoid negative coping strategies (such as withdrawing kids from school) and increased investment in human capital. Strengthening of delivery systems both on education and social protection side would help make these services more resilient to impacts of natural and economic shocks. Moreover, the project could also contribute to environmental resilience through support to training associated with green jobs and environmental initiatives and introduction of environmental aspects in education curriculum.

Specifically, the AF will finance the rehabilitation/construction of 60 ECCD centers, with water and sanitation facilities designed for 3–5-year-olds in selected rural and low populated areas. The rehabilitation work will include converting existing community facilities or health centers (which are rarely used by the communities) into functional ECCD centers. Screening will be carried out to ascertain the presence of squatters in these facilities and if found will be provided with compensation for the loss of their living and livelihood, if any.

To complement the reduction of digital divide efforts under the parent project, the AF will provide local connectivity in rural schools to support implementation of digital curriculum, which is currently unavailable. Under the HCRRP, ICT for Education activities include development of digital curriculum, teacher training, and provision of digital equipment. Specifically, the AF support will expand the internet coverage from school administrative offices into the classrooms by installing fiber-optic internet access connected through the local area network system.

The proposed AF will support the Ministry of Education and Skills Development (MoESD) in improving safe and sanitation services by rehabilitating and constructing WASH facilities in selected 20 SEN schools and 40 primary and secondary schools in both rural and urban areas. Specifically, the AF will upgrade dry/pour flush toilets to flush toilets for girls and boys and build new toilets for girls. This will improve health and hygiene of students and teachers, as well as lift the barrier for children with disabilities, which contribute to better students' attendance and learning.

The proposed AF IPF Component's main activities will include: (i) supporting overall project management and coordination; (ii) strengthening implementation capacity by hiring Technical Assistants (Project Manager, Project Coordinator, Financial Management and WASH monitoring and evaluation), conducting training/workshops, including project management, fiduciary and M&E, (iii) provision of relevant goods (office equipment for central and district levels) for improving the quality of service delivery, and (iv) strengthening monitoring and evaluation of project progress of outcomes to execute a results-based financing (e.g. third party verification).

Purpose of the ESSA

The Environmental and Social Systems Assessment (ESSA) is being prepared by the Bank's task team following the World Bank PforR guidelines and reviewing relevant government policies and acts and analyzing MoESD's existing capacity to manage Environmental and Social issues during implementation of the proposed program. The ESSA provides a comprehensive review of relevant government systems and procedures those address environmental and social issues associated with the Program and the extent to which the government environmental and social policies, legislations, program procedures and institutional systems are consistent with the six 'core principles' of the World Bank's policy for PforR financing and find out the gaps. It also recommends actions to address the gaps and capacity development programs to bridge the gaps in managing E&S risks and to enhance performance during Program implementation. The results of the ESSA have been shared and agreed with MoESD and other key government stakeholders.

The activities under the Parent and the AF Program are unlikely to have any adverse impacts that cannot be mitigated if sound policies are in place. However, planned efforts are essential to ensure that project interventions do result in sustainable environmental and social benefits. Accordingly, a comprehensive assessment of the environmental and social systems has been undertaken to gauge the adequacy of environmental and social systems, especially with focus on MoESD.

The ESSA reviewed the proposed Program activities to evaluate its effects on the environment and potentially affected people. The draft ESSA was shared with the stakeholders of the project and virtual public consultation was organized to obtain their views and suggestions. Outcome of the consultation endorsed through analyzing MoESD's existing rules and capacity to manage Environmental and Social issues and discussion with the stakeholders is incorporated in the ESSA and would be addressed through the Program Action Plan (PAP).

Objectives of the ESSA

The objective of ESSA is to ensure consistency with the six core principles following World Bank Guidance on Environmental and Social Systems Assessment in order to effectively manage program risks and promote sustainable development.

The specific objectives of ESSA include:

- Identification of potential environmental and social benefits, risks and impacts applicable to the Program interventions;
- Review of the policy and legal framework related to management of environmental and social impacts of the Program interventions;
- Assessment of the institutional capacity for environmental and social management system within the Program system;
- Assessment of the Program system performance with respect to the core principles of the PforR instrument and identification of gaps, if any, and
- Recommendations for actions to be taken to fill the gaps, i.e., mitigation measures that will be used as input/s to the PAP.

Approach to the ESSA

The ESSA development team used various approaches to review the environment and social systems that are relevant to the HCRRP undertaken by RGoB's MoESD in the light of the PforR Core Principles affecting the program and their guiding questions. The ESSA was developed based on: (i) identification of environmental and social risks associated with the project (ii) a review of existing policies, development plans, legal and regulatory framework and guidelines of the international development financing institutions working with MoESD, which are relevant to identified ES risks management; (iii) meetings and interviews with different stakeholders including focal persons of the ministries and relevant other organs/staffs involved in environmental social, health, safety and labor issues in development projects at MoESD; (iv) an assessment of relevant environmental and social management systems at MoESD; (v) an assessment of the capacity and performance of MoESD relative to their own procedures and processes; (vi) development of an action plan to enhance environmental and social management capacity and performance; and (vii) development of performance monitoring and implementation support program.

The data gathered from these multiple sources were processed to allow for triangulation. The national level consultations were organized with stakeholders for feedback on the implementation of provisions to enhance transparency and accountability and other related environment and social issues.

The ESSA reviews the proposed activities to evaluate its effects on the environment and potentially affected people. Risks identified through the ESSA will be addressed through the results area, or through DLIs whichever is most feasible. If required, this operation will include safeguards risk mitigation measures in the PAP and/or identify opportunities to improve systemic implementation, strengthen institutional capacity through the Program.

ESSA Methodology and Process

This ESSA is prepared by the World Bank task team and consultants through a combination of reviews of existing Program documents and available technical literature, interviews with government staff, and consultations with key stakeholders and experts. The Team undertook the following actions as part of the assessment (a) a comprehensive review of government policies, legal frameworks and program documents, and other assessments of RGoB's environmental and social management systems (b) interviews and consultations were done with relevant experts and officials from MoESD and National Environment Commission (NEC).

Findings of the assessment will be used in the formulation of an overall PAP with key measures to improve E&S management outcomes of the Program. Recommendations contained in the analysis were presented and discussed during the consultation workshop with the concerned IA before finalization and disclosure of the ESSA.

The ESSA review process undertook the assessment of the existing systems for managing environmental and social effects of the program. Following tools were used:

- **Assessment of the environmental and social effects of the program:** The ESSA Team assessed the potential for the program to cause adverse E&S effects, either due to its design and Program components or due to gaps in the Government system.

- **Comprehensive desk review of policies, legal framework, program documents, and other assessments of environmental and social management systems:** The review examined the set of national policy and legal requirements related to environment and social management associated with the activities described under the Program results areas.
- **Institutional analysis:** An institutional analysis was carried out to identify the roles, responsibilities, and structure of the relevant institutions responsible for implementing the HCRRP funded activities, including coordination between different entities at the national, and local levels. The assessment of the capacity of key institutions to implement required environmental and social management actions was assessed. An important input for this assessment was an evaluation of these institutions' previous track record in managing such risks in the context of previous projects and programs.
- **Consultations and Interviews:** Interviews and consultations were done with relevant experts and officials from MoESD and NEC.

SECTION I: PROGRAM DESCRIPTION

1.1 Description of the Program Scope and Objective including Activities

The Parent and the Additional Financing of *Bhutan Human Capital Recovery and Resilience Project* (HCRRP - P174399) is a Program-for-Results (PforR) financing by the Bank. The Program Development Objective (PDO) is to *support building, protecting, and utilizing human capital in Bhutan*.

The proposed Program aims to strengthen implementation of select activities of two government programs with the goal of accelerating economic recovery that fall primarily under NKRA 7 and 11 on improved access and quality of education and improved employment outcomes under 12th FYP including programs introduced to mitigate the impacts of COVID-19 and supports the implementation and improve human capital outcomes. The 12th FYP (2018-2023; Gross National Happiness Commission, 2019) focuses on strengthening institutions, systems and processes and streamlining and coordination to avoid overlaps and duplication, harnessing synergies and maximizing use of existing infrastructure. NKRA 7 and 11 of the 12th FYP are directly related to the Program objectives, since they support results in areas of education, skills, and employment. The Program Under this umbrella aims to (i) ensure a strong foundation for lifecycle approach to boost future human capital accumulation; (ii) support post-COVID-19 pandemic economic and human capital recovery, and (iii) increase post-COVID-19 pandemic human capital resilience.

The PforR Program boundary is defined by activities/programs under NKRA 7 and 11 contribute to: (i) sustainable household welfare and human capital recovery post COVID-19 pandemic; (ii) increased equity and inclusion along rural/urban, socio-economic (e.g. urban poor) and gender lines; (iii) improved quality of foundational human capital services (ECCD); (iv) enhanced resilience of service delivery through support to digitization in education and program coordination in area of employment support; (v) increased ability to utilize accumulated human capital through employment; and (vi) investments in human capital needed for enhanced climate resilience. Program boundary is not limited geographically aligning with the nationwide mandate of 12th FYP, though NKRA 7 and 11 have an additional focus on improving outcomes in rural areas and for vulnerable populations.

The proposed AF will finance the rehabilitation/construction of 60 ECCD centers, with water and sanitation facilities designed for 3–5-year-olds in selected rural and low populated areas. The rehabilitation work will include converting existing community facilities or health centers (which are rarely used by the communities) into functional ECCD centers. Screening will be carried out to ascertain the presence of squatters in these facilities and if found will be provided with compensation for the loss of their living and livelihood, if any.

To complement the reduction of digital divide efforts under the parent project, the AF will provide local connectivity in rural schools to support implementation of digital curriculum, which is currently unavailable. Under the HCRRP, ICT for Education activities include development of digital curriculum, teacher training, and provision of digital equipment. Specifically, the AF support will expand the internet coverage from school administrative offices into the classrooms by installing fiber-optic internet access connected through the local area network system.

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and teachers, as well as lift the barrier for children with disabilities, which contribute to better students' attendance and learning.

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1.2 Differences in Scope between the Borrower's program and the Bank-Financed Program

There is no difference in the thematic scope between the Borrower's program and the Bank-Financed Program.

Exclusions:

The proposed PforR will not support any activities that potentially could have significant environmental and social impact. The Program excludes activities/areas requiring large procurement contracts (above 3 million USD) and will not support any major civil work with substantial environmental and social risks and impacts and high value/cost activities. The exclusion also includes any activity that will result in physical and economic displacement of the project affected people, including land acquisition. However, construction of small scale ECCD centers and WASH facilities for schools that will have no significant environmental and social impact will not be excluded.

1.3 Disbursement Linked Indicators and Verification Protocols

The Program has a number of DLIs across four Result Areas (RA), and DLRs mapped across the three-year period towards the achievement of PDOs and specific outputs to incentivize the successful implementation of critical reform actions in the theory of change. The DLIs allocations were determined based on the relative importance of individual results of the national agenda.

1.4 Key Implementing Agency and Experience with Implementation of Program

The Parent Program was planned to be implemented by the Ministry of Labour and Human Resources (MoLHR) and the MoESD. However, since the MoLHR is no longer in existence, the Program including the AF will now be implemented by the MoESD. MoESD is already implementing the parent Program under PforR and now is conversant with the modalities of the implementation as well as Bank PforR systems and policies. But MoESD is new to ESF to implement the AF IPF component. Given the low risk profile of the IPF component, this will not be a significant barrier to implementing the IPF component. A face-to-face training on ESF was conducted by the bank ES team in Thimphu for the client and hands-on assistance is also being provided.

SECTION II: EXPECTED PROGRAM ENVIRONMENTAL AND SOCIAL RISKS AND OPPORTUNITIES

2.1 Environmental Risks and Opportunities of the Program

The ESSA is being prepared following the World Bank PforR guidelines, relevant RGoB policies and acts and analyzing MoESD's existing capacity to manage Environmental and Social issues to implement the proposed Program. This ESSA also identifies the existing gaps and proposes capacity development programs to bridge the gaps in managing environmental and social risks. The ESSA reviewed the proposed Program activities to evaluate its effects on the environment and potentially affected people. Risks identified through the ESSA and measures to improve systemic implementation and strengthen institutional capacity of MoESD have been addressed through the inclusion of gap filling activities in the Program Implementation Plan (PAP).

Potential Environmental Risks

E-Waste

Management of e-wastes, if not stored and disposed properly is likely to have some adverse impacts. The parent HCRRP program involves distribution of computers, tablets and other digital devices to teachers and students who are trained under the program and others who will participate in the program. Given the rate at which new devices are developed and old ones become unserviceable are discarded, these computers, tablets and digital devices will constitute e-waste and become a risk to the environment and persons if not properly handled. The AF support will expand the internet coverage from school administrative offices into the classrooms by installing fiber-optic internet access connected through the local area network system. Given that the quantity of e-waste is expected to be small and the impact would not be significant. RGoB has a rule on hazardous waste management which should be followed in case of disposal of such waste.

Waste related to Management of COVID-19

Inadequate and inappropriate handling of healthcare waste related to COVID-19 may have serious public health consequences and a significant impact on the environment. Large number of people will be gathering in a training venue during the COVID-19 pandemic and they must wear masks, gloves and other protective equipment. Dumping of these hazardous wastes within the training venue will be a normal phenomenon. Adopting a strict policy and guidance to follow in handling waste under the COVID-19 pandemic, considering the additional capacity and resources are required to maintain compliance for proper waste management.

Solid and liquid Waste

It is expected that several kinds of wastes that generate during the small-scale constructions, scrap paper, carton, unused writing materials from the training events would be generated and dumped within the Program intervention areas. Wastes from the WASH blocks during its construction and operation will also have to be handled carefully.

WASH Facility-Specific Issues

There could be a number of issues related to the WASH facilities that may include drying up water sources, unsafe drinking water, lack of maintenance of toilets, lack of menstrual hygiene management and improper design of toilets in schools of special education needs. Engineering design must include an assessment of water use and adequacy of water sources and water quality management including testing as well as provision of the concept of universal access. The ECCD centers must also ensure toilets are maintained for cleanliness and menstrual hygiene facilities are provided.

Potential Environmental Benefits

Reduced Pollution Footprint

Online learning reduces the negative environmental impacts that come from manufacturing and transportation. The materials needed for traditional education institutions (textbooks, desks, electricity, buildings) are dramatically reduced. This reduces waste and conserves natural resources. Additionally, online learning saves money and time for both the learning institution and the student. Finally, online education will save paper because the curriculum, assignments and even textbooks will all be digital and will contribute to reducing deforestation.

Enhancing Climate Resilience

The operation will provide incentives for increased provision of market relevant training for climate-responsive initiatives, strengthened ECCD training programs for facilitators to make it more climate responsive, and enhanced education system resilience and school continuity in the context of natural disasters. Furthermore, digitization of textbooks and continuing education through online contents is expected to support conserving natural resources, save a great amount of paper and thereby leave a green carbon footprint.

Skills and apprenticeship program would include curriculum providing basic environmental awareness of the trainees through training associated with green jobs and environmental initiatives and introduction of environmental aspects in education curriculum. Given the scope of the Program, potential environmental risks and impacts are expected to be insignificant. The environmental risk associated with the Program is Low.

2.2 Social Risks and Opportunities of the Program

Given the scope of the Program, potential social risks that may surface are:

Exclusion of Disadvantaged and the Vulnerable (Youth, women, person with disability, people living in remote areas)

Exclusion of the youth from skills and apprenticeship program who are disadvantaged and vulnerable-especially those who suffer from any form of disability, youth living in inaccessible areas of the country, female youths who are unlikely to be able to take part in the Program due to social norms and restrictions.

Exclusion of Severely Disadvantaged Children from ECCD centers

ECCD centers may not accept severely disadvantaged children due to the lack of trained facilitators. The Draktsho Vocational Training for Special Children and Youth, only one of its kind in the country is working to enhance the living standard of children and youth with various types of disabilities through empowerment by training, and eventual integration with the mainstream population.

ECCD program for Children from poorer families and inaccessible areas

ECCD centers are community based, mobile, workplace based and private. Though there are almost no gender differences in enrolment rates in the ECCD, Bhutan's mountainous terrain

creates geographical barriers to access, particularly to rural children. Quality, equity, and sustainability are other key concerns of the ECCD program that need to be addressed.

Competency of the ECCD Facilitators and inadequacy of facilities for children with special needs

ECCD quality is a concern, with only one third of existing ECCD facilitators, caregivers, having completed the in-service training program. All ECCD centers do not have facilities to meet Special Education Needs (SEN) of the mentally and physically impaired children.

Likelihood of GBV and SEA/SH of the Women and Girls involved with the program

There could be cases of sexual exploitation and abuse/sexual harassment (SEA/SH) of female trainees/students. The likelihood of SEA/SH also extends to girls and women in the areas where the program will be conducted. As such this issue needs to be handled especially. Given the Low-risk rating of the Program, GBV prevention may include sensitizing the assigned staff and carrying out awareness campaigns in the community, ensuring the contractors' workers are trained on GBV prevention and signing of code of conduct and mapping GBV service providers.

Leniency at the ECCD in following COVID-19 protocols

COVID-19 pandemic is very well handled by RGoB and 97% of the population has been vaccinated. As of July 31, children from the age of 12-17 have been vaccinated in 9 Dzongkhags that were deemed as high-risk areas. Non-compliance of COVID -19 protocol issued by the Ministry of Health (MoH) by the ECCDs may put the children in danger.

The social risks mentioned above can be mitigated by intensive stakeholder and beneficiary mapping, consultation and feedback, continuous monitoring as well marketing the Skilling and Apprenticeship Program so that information is disseminated. Selection of the beneficiaries must be done in a manner to ensure inclusion of women and other lagging populations so that benefits reach those who are deprived and lack voice and agency. Poverty targeted scholarships for children joining ECCD centers from the poorer families to meet education related expenses need to be thought about. A Code of Conduct and training for apprenticeship and skilling service providers and local labors, monitoring of their behaviors and interaction with female trainees and appropriate grievance mechanisms would have to be in place to deter any possibility of GBV/SEA/SH.

No cultural heritage is also likely to be affected. There is no impact on the ethnic minorities. The social risk associated with the Program is Low.

Social Benefits of the Program

The Program would benefit the pre-primary level children with the right kind of quality education in particular in the following manner:

- The ECCD interventions would provide a head start for the children which will eventually provide scope for growing up to be a contributing member of the society-increasing positive human capital and demographic dividend.
- Teacher capacity development is very much addressed in the program. Increased resources are needed to ensure availability of digitized materials, revamp the teacher training curriculum and improve overall school climate for blended learning.

It is pertinent to note here that to cope with COVID-19 safety protocols, schools were closed, therefore in order to bridge the gap for learning opportunities children with special needs and students with disabilities were offered tablets to engage in online classes or to access material offered by schools online.

SECTION III: ASSESSMENT OF BORROWER'S ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

3.1 Environmental and Social Management Systems including Policy and Legal Framework

3.1.1. Environmental Laws and Acts: The Royal Government of Bhutan (RGoB) has a number of environmental laws and acts. Given that the present Program intervention has very limited environmental risks and impacts, only major environmental laws are summarily mentioned below:

Sustainable development is enshrined in the government's **National Environment Strategy for Bhutan 1998**, which aims to maintain a balance between environment and development. **The Environmental Assessment Act 2000**, which requires that all environmental concerns are fully considered prior to the formulation of new project and it establishes procedures for assessing the potential impacts of plans, policies, programs, and projects. The act mandates that an environmental clearance from a competent authority should be conducted as a pre-requisite for a project.

National Environment Protection Act 2007 came into force on July 31, 2007. It is an act to provide the establishment of an effective system to conserve and protect the environment through the National Environment Commission Secretariat or its successors, designation of competent authorities, and constitution of other advisory committees, so as to independently regulate and promote sustainable development in an equitable manner. It is guided by environmental principles, which states that the people and the government in succession shall perpetually strive to consider and adopt its developmental policies, plans and programs in harmony with the environmental principles.

When developmental projects are in the Thromde (municipality), the project is governed by the **Thromde Act of Bhutan (2007)**, and the **Thromde Rules (2011)** and the designated competent agency to grant development and environment clearance is the Thromde. Where development projects in rural areas or where small improvement works within rural Health Care Facilities (HCFs) are proposed, the designated competent authority is the Dzongkhag environmental officer and must abide by **Rural Construction Rules (2013)** for the Ministry of Works and Human Settlement (MoWHS).

The **National Health Policy (2011)** provides guidance to the Ministry of Health (MOH) to achieve its national and international health goals as guided by the constitution. Other relevant regulations and standards are the **Water Regulation of Bhutan (2014)** and the **Environmental Standards (2010)** that regulate the water and ambient air quality standard.

Bhutan has several strategies, acts and regulations related to waste management such as the **Waste Prevention and Management Act of Bhutan (2009)** and **Waste Prevention and Management Regulation (2012)** that promote the principles of 3Rs (reduce, reuse, and recycle). The act and regulation discuss waste reduction at the source; promoting segregation, reduction, recycling, and disposal of waste in an environmentally sound manner. The Regulation came into effect on 18 April 2012 and is a comprehensive document for the waste minimization and management. In this regulation E-Waste Management falls under Category D of the Waste Management Categories. The Department of Information Technology and Telecom provides overall directives and guidelines and monitor the implementation by the e-waste management

entity¹. The **National Waste Management Strategy (2019)** encompasses adopting a circular economy and moving towards a zero-waste society by 2030.

The environmental clearance procedure is described in the **Regulation for the Environmental Clearance of Projects (2016)**, and specific guidance is given in a series of sectoral guidelines, prepared in 1999 and revised with ADB assistance in 2006. According to the Environment Assessment Act, the proponent is required to submit an environmental clearance application to a designated competent authority wherein all environmental concerns are fully considered and documented.

The Economic Development Policy, 2016 is clear in its intent to ensure the growth and development of a green and sustainable economy. The vision of the policy is “A green and self-reliant economy sustained by a knowledge-based society guided by the philosophy of GNH”. The strategies outlined in the policy are informed by the need for environmental sustainability, and include imperatives to:

- Diversify the economic base with minimal ecological footprint;
- Harness and add value to natural resources in a sustainable manner;
- Promote Bhutan as an organic brand; and
- Reduce dependency on fossil fuel.

The 12th Five Year Plan 2018-2023 has identified 17 National Key Result Areas for development, emphasizing building economic resilience and productive capacity, and addressing last mile challenges to reduce poverty and inequality. At the same time, environmental sustainability is an important theme running throughout the Plan, including several environmental indicators.

3.1.2. **Social Laws and Acts:** Bhutan has a number of Social Laws and Acts of which, Program related Laws and Acts are mentioned below:

Constitution of the Kingdom of Bhutan: The Constitution of Kingdom of Bhutan has a number of this Program related articles mentioned below:

Article 9: Principles of State Policy (related Acts):

6. The State shall endeavor to provide legal aid to secure justice, which shall not be denied to any person by reason of **economic or other disabilities**.

7. The State shall endeavor to develop and execute policies to **minimize inequalities of income**, concentration of wealth, and promote equitable distribution of public facilities among individuals and people living in different parts of the Kingdom.

9. The State shall endeavor to achieve **economic self-reliance** and promote open and progressive economy.

11. The State shall endeavor to promote those circumstances that would enable the citizens to secure an adequate livelihood.

12. The State shall endeavor to ensure the **right to work, vocational guidance and training** and just and favorable conditions of work.

¹ <https://www.cseindia.org/waste-management-policy-in-bhutan-4584>

15. The State shall endeavor to **provide education for the purpose of improving and increasing knowledge**, values and skills of the entire population with education being directed towards the full development of the human personality.
16. The State shall provide **free education to all children of school going age** up to tenth standard and ensure that technical and professional education is made generally available and that higher education is equally accessible to all on the basis of merit.
17. The State shall endeavor to take appropriate measures to **eliminate all forms of discrimination and exploitation against women including trafficking, prostitution, abuse, violence, harassment and intimidation at work in both public and private spheres**.
18. The State shall endeavor to take appropriate measures to **ensure that children are protected against all forms of discrimination and exploitation** including trafficking, prostitution, abuse, violence, degrading treatment and economic exploitation.

The **Local Government's Act of Bhutan (2007)** accounts for the provision of social and economic services of citizens in a sustainable and equitable manner and ensures that any activities undertaken are consistent with laws and policies in the country to conserve and enhance the environment within its jurisdiction.

Bhutan Labour and Employment Act 2007: The Act (Chapter II) prohibits any form of Child, Forced and Trafficked labor (none below 18 will be employed, children between 13-17 may be employed in non-hazardous work after carrying out risk analyses--Chapter X). It also prohibits discrimination against employees or job applicants for vacancies in connection with recruitment, dismissal, transfer, training and demotion as well as wages and working conditions. The Act also has conventions **against sexual harassment and abuse against any employee by the employer and other employees** (Chapter II, Paragraph 9). Written agreement, terms and employment of contracts and issues regarding leave entitlement, maternity benefit, working hours, working at night are also illustrated in the Act (Chapter V). Termination, retrenchment, issues of wrongful dismissal and remedies thereto are also given in this Act (Chapter VI, VII, VIII). Employers' responsibilities with regards to Occupational Health and Safety (OHS), maintenance of safe working space, provision of PPE and training, reporting requirements in case of accidents and incidents are also part of the Act (Chapter IX). This act also contains regulations for Workers Association (Chapter XI) as well as a robust **Grievance Redress System** for the workers (Chapter XII). **Bhutan 2020: A Vision for Peace, Prosperity and Happiness.** The overarching objective of the "Bhutan 2020: A Vision for Peace, Prosperity and Happiness" prepared by the then Planning Commission of the Royal Government of Bhutan is development based on the GNH concept which emphasizes the ability of all to realize their potential; equitable sharing of the benefits of development; and opportunities for all to share in decisions that affect their lives, livelihoods, and families. This vision cannot be attained without ensuring that women have equitable access to self-realization, development benefits, and participation in decision making.

A National Plan of Action for Gender (NPAG) 2008-2013: The NPAG which was formulated by the Gross National Happiness Commission and the National Commission for Women and Children identified seven critical areas for action. It is the first gender plan of Bhutan and is considered as a continually evolving document that looks at advances and challenges in promoting and achieving gender equality in seven areas identified as critical for action to achieve good governance; economic development, with a focus on employment; education and training; health; ageing, mental health and disabilities; violence against women; and prejudices and stereotypes. During the five-year action plan period, violence against women was the area of action that received the most attention and follow-up. This included the enactment of the Domestic Violence Prevention Act, 2013.

Bhutan National Education Policy 2018 (Draft): It aims to create a robust and holistic education system that inculcates the principles and values underpinning Gross National Happiness, and upholds the nation's unique cultural and spiritual heritage and values; and that prepares citizens to become knowledgeable, skillful, creative, innovative, enterprising, and capable of responding to the national needs and emerging global trends. **Chapter 6** of the Policy specifically deals with Early Child Care and Development (ECCD). ECCD provides opportunities for all children aged 0 to 8, including those with special educational needs, to develop to their full potential. ECCD programs and services provide strong foundations for learning, lifelong development and a smooth transition from early childhood education to school. It stipulates that:

- All children from 0 to 8 years of age shall have access to ECCD programs and services.
- Home based parenting education and interventions shall be encouraged through awareness and advocacy programs to cater to children from conception to 35 months of age to promote childcare, health, hygiene, nutrition, and stimulation.
- MoESD shall provide early learning opportunities for children aged 36 to 71 months old.
- Interventions shall be instituted in primary schools to transition children aged 6 to 8 years from ECCD to primary school.
- The establishment and operation of public, private, community and workplace-based Crèches and ECCD centers shall fulfil the prescribed standards and guidelines set by the MoESD.
- MoESD shall regulate the provision of ECCD education services.
- ECCD centers must address the needs of all 36 to 71 months old children and be inclusive of gender, disabilities, socioeconomic backgrounds, or location.
- ECCD centers shall not collect any form of fee or contribution from students/families other than fees approved by the MoESD.

Chapter 9 (Curriculum, Assessment and Recognition) of the same Policy states that the use of ICT in teaching and learning is inclusive of gender, special educational needs, socio-economic circumstances and geographic location.

Chapter 11 (Literacy and Lifelong Learning) of the same Policy states that *opportunities shall also be provided to enhance literacy, numeracy, and vocational skills through appropriately resourced educational institutes, distance and online learning.*

Penal Code of Bhutan: As per the Penal Code of Bhutan (Sections 205 and 206), a defendant shall be guilty of sexual harassment, if the defendant makes unwelcome physical, verbal or non-verbal abuse of sexual nature. Sexual harassment includes staring or leering, unwelcome touching, suggestive comments, taunts, insults or jokes, displaying pornographic images, sending sexually explicit emails or text messages, and repeated sexual or romantic requests. It also includes behaviors such as sexual assault, stalking or indecent exposure. *(One issue to be noted is that GBV is an issue deeply rooted in the Bhutanese society. Prevalence of Violence against Women and Girls conducted by the National Commission of Women and Children (NCWC) in 2017 noted that there have been only 27.5% who have sought help from the service providers while more than 40% of these women have never told or reported the incident of violence.² Psychological violence particularly controlling behavior, one of the most common forms of domestic violence is also prevalent in society. Around 35.3% of women and girls experienced one or more forms of controlling behavior including restricting access to health services).*

² Source: Prevalence of Violence Against Women and Girls conducted by the National Commission of Women and Children (NCWC)

Domestic Violence Prevention Act 2013 and the Child Care and Protection Act 2011: It includes commitment and appropriate redressal and protection measures to eliminate sexual harassment.

Standard Operating Procedure (SOP) for Case Management for Women and Children in Difficult Circumstances: This has been developed by the NCWC and provides a comprehensive coordination framework involving all the key service providers and a step-by-step procedure for handling complaints. As such, an individual may also choose to report to the Royal Bhutan Police, the NCWC, health or counselling services or any relevant Civil Society Organization. Walk-in complaints, reporting by telephone and complaints through the Toll-Free Helplines of RBP (113) and the NCWC (1098) are the ways by which individuals can lodge complaints on sexual harassment that occur in any kind of setting (at homes, schools, institutions, shelters, public places, workplaces, etc.).

Regulations of Working Conditions 2012: This requires all employers of companies registered under the Companies Act of the Kingdom of Bhutan 2000 and enterprises with a capital input in excess of 1 million ngultrums, to have a Sexual Harassment Policy and a written complaints procedure for victims to lodge a formal complaint against the harasser.

3.2 Institutions for Environmental and Social Safeguard

National Environment Commission (NEC)

The NEC is the highest decision-making body on all matters relating to the environment and its management. It is a cross-ministerial independent body, chaired by the Foreign Minister. The NEC has the authority to designate any ministry, organization, agency, or committee as a competent authority to carry out its functions. The responsibilities can range from the development of sector-specific regulations and guidelines (which must be approved by the NEC for formal adoption), issuance of environmental clearances, monitoring of compliance, imposition of penalties within a specified limit, decisions to halt economic activities in cases of noncompliance, and authority to raise concerns with the NEC in environmentally sensitive situations. Should these competent authorities be unable to resolve disputes or environmental cases, the NEC is to review and decide on these matters. On environmental disputes or noncompliance, the NEC can issue fines and/or suspend or revoke environmental clearances in part or whole, thereby halting project activities. If required, it can also call for the establishment of an environmental tribunal to hear specific environmental disputes. During the environmental clearance processes, public consultations are held with the local communities which account for a certain degree of social considerations.

The Environmental Assessment and Compliance Division (EACD) under NEC is responsible for granting environmental clearances for all activities in the country. The EACD has three clearance lists: green, blue and red. Activities listed under the green list do not require environmental clearance. Activities under the blue list have to undergo an assessment at the Initial Environmental Examination level and follow through other due processes as per the law. Activities under the red list have the highest level of clearance requirements and are subject to environmental impact assessments. **ECCD centers are categorized under the green list, due to which it does not require any environmental clearance.** The Local Government is the competent authority with the mandate to support social welfare as well as to seek necessary environmental clearances from the government and other institutions.

ECCD with the objective to support social welfare, no physical displacements would be made under any circumstances. Since this program is meant for the children in the community, no environmental clearance is required. However, if need arises, the Local Government is mandated

to seek clearance after the identification of the site from NEC. Procedures for seeking environmental clearance for New Projects are explained in **Annex D**.

3.3 Institutional Capacity Assessment of the Ministry of Education and Skills Development to Manage Environmental and Social Impact

Early childhood care and education is known in Bhutan as ‘early childhood care and development (ECCD)’. The concept was adopted in the education system of Bhutan since 1990’s after Bhutan ratified the convention on the rights of the child (CRC) in 1990.³ ECCD, a national priority in Bhutan, and was first reflected in the 9th FYP (2002-2007; Planning Commission of Bhutan, 2001). MoESD has over 19 years of first-hand experience of successfully running the ECCD program. ECCD centers are inclusive of gender, disabilities, socio-economic backgrounds, or location and address the needs of all children. Different aspects of ECCD centers namely surroundings, building, water, sanitation and hygiene (WASH) facilities, play area, hazards, covered space and materials are taken into consideration before confirmation.

The MoESD has prioritized the expansion of ECCD centers; professional development of ECCD facilitators and key ECCD focal persons at all levels of management; supply of ECCD teaching and learning materials; and ECCD-related policy development and advocacy. The National Early Learning and Development Standards (NELDS) is the guiding document for developing curriculum, parenting education and training.



Figure 1 ECCD inclusion in recent Five Year Plans

The operation aims to support the 12th FYP goal of expanding access to quality ECCD services to allow for equitable investment in foundational human capital. This includes targeting the urban poor and remote rural areas thus making access to quality ECCD services more equitable. The program will also improve quality by professionalizing the ECCD staff, teachers, facilitators, focal monitors, and program managers and strengthening the quality assurance system. As a higher-level objective, expanded and improved ECCD services will lead to measurable improvements in child development outcomes and on-time school admission rates.

³ World Scientific News, Early childhood care and education in Bhutan: an evaluative study; WSN 37 (2016) 279-303, ; EISSN 2392-2192; page 283

Given the nature of the PforR Program, no significant adverse environmental and social impacts are expected from the Program. The NEC and the local government would deal with E&S management of risks and impacts. As such, MoESD does not need any dedicated entity within the ministry for this purpose.

The MoESD will not require a separate GRS for the program. The usual practice is that MoESD receives the complaints if any, directly from the individual/agency affected. Besides, the individual/agency affected can make direct complaints to Anti-Corruption Commission of Bhutan (ACC), e-KaaSel and Prime Minister's Office (PMO).

The MoESD will not need a new system to address program related GBV issues. For GBV, Bhutan has NCWC, Respect, Educate, Nurture and Empower Women (RENEW) and Royal Bhutan Police (RBP) that are effective.

The management of waste generated during the training program including disposal of hazardous and bio-medical waste such as masks and gloves are subject to the *Standard Operating Procedures (SOP) for Waste Management in the Institutions* set by the NEC that are derived from the Waste Management Strategy (2019) that derives strength from the Waste Prevention and Management Regulation (2012). This plan focuses on “efficient biomedical and hazardous waste management” that is achieved through (i) segregation, (ii) safe disposal and (iii) capacity development.

Bhutan Foundation is working on a Special Education Program aimed at building the capacity of teachers, parents and caregivers that care for children with special needs by offering trainings and workshops. The program also teaches children with special needs skills that could aid them in earning incomes for the future.

3.4 The Grievance Redress Mechanism (GRM)

The RGoB on 26 December 2017, launched an online grievance redressal system where people can express their dissatisfaction, problems and provide feedback on public services offered in the country. Known as **eKaaSel**, the system has been developed to serve as a one-stop platform with the primary objective of streamlining the grievance redressal aspect of service delivery through an online channel of communication. With this system in place, people need not come in person to file their complaints.

The system entertains any complaint and grievance expressed in regard to poor or inefficient services. Over 135 public services are offered with 120 online services and 15 mobile services. All applications will be directed to the Cabinet Secretariat under the PMO who will assess the application before forwarding it to the concerned ministry or department for further action. A time period would be set within which the complaint related to a ministry would be resolved. **e-KaaSel** encourages more citizen engagement and participation in public services division initiatives towards making public services citizen-centric and strengthening the accountability mechanism in public agencies. To make sure that each and every grievance receives attention, the applicant will be notified by SMS as soon as the application arrives and after the grievance has been addressed. The system is intended to enhance transparency and accountability in public service delivery. Currently, the system captures the existing ten ministries with agency users mapped to the secretaries and head of departments.⁴

⁴ <https://thebhutanese.bt/ekaasel-online-grievance-redressal-system/>

The system requires an application to submit verification details, along with a valid mobile number to enable receipt of SMS notification upon submission of the grievance. Using the application ID, the applicant can track the status of the submission. To assist the users in availing the facility, a comprehensive user guide has been developed and available from the **eKaaSel** portal. The applications are directed to the Cabinet Secretariat who assesses the application before forwarding it to the concerned Ministry or Department for further action.

The system is intended to enhance transparency and accountability in public service delivery. The system is monitored by the Public Services and Grievance Redressal Division (PSGRD). The Division generates periodic reports on the system usage and applicability. **eKaaSel** can be accessed from the Citizen Portal- www.citizenservices.gov.bt

On SEA/SH and GBV related matters, there exists a number of channels of reporting incidents. These include: RBP, NCWC, health or counselling services or any relevant Civil Society Organization. Walk-in complaints, reporting by telephone and complaints through the Toll-Free Helplines of RBP (113) and the NCWC (1098).

At the moment-MoESD does not have a dedicated permanent grievance redress system of its own. The usual practice is that MoESD receives the complaints if any, directly from the individual/agency affected. Besides, the individual/agency affected can make direct complaints to Anti-Corruption Commission of Bhutan (ACC), e-KaaSel and Prime Minister's Office (PMO).

The MoESD has no plan to come up with a new system to address program related GBV issues. For GBV, Bhutan has NCWC, RENEW and RBP who are engaged in GBV cases. Given the Low-risk rating of the project, GBV prevention may include sensitizing the assigned staff and carrying out awareness campaigns in the community, ensuring the contractors' workers are trained on GBV prevention and signing of code of conduct.

Communities and individuals who believe that they are adversely affected as a result of a Bank supported PforR Program, as defined by the applicable policy and procedures, may submit complaints to the existing program grievance redress mechanism or the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address pertinent concerns. Affected communities and individuals may submit their complaint to the World Bank's independent Inspection Panel that determines whether harm occurred, or could occur, as a result of the World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate GRS, please visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

SECTION IV: OPERATIONAL PERFORMANCE AND INSTITUTIONAL CAPACITY ASSESSMENT

4.1 Summary of Assessment of Environmental and Social systems of MoESD

The Environmental Assessment and Compliance Division (EACD) under NEC grants environmental clearances for all activities in the country. The EACD has three clearance lists: green, blue and red. Activities listed under the green list do not require environmental clearance. Activities under the blue list have to undergo an assessment at the Initial Environmental Examination level and follow through other due processes as per the law. Activities under the red list have the highest level of clearance requirements and are subject to environmental impact assessments. ECCD centers are categorized under the green list and do not require any environmental clearance. The Local Government is the competent authority with the mandate to support social welfare as well as to seek necessary environmental clearances from the government and other institutions. However, if need arises, the Local Government is mandated to seek clearance after the identification of the site from (NEC).

The MoESD have long experience of running TVET and ECCD programs. The Local Government is accountable for the handling of social issues. As such, MoESD is not required to have a setup within the ministry to manage program related E&S issues.

It may be noted that the three core principles' applications are enshrined in the program's DLI 1, 2, 3, 4 and 5 for DLI 6, 7, and 8 for MoESD.

4.1.1. Core Principle 1

Core Principle 1 related issues under the program would thus be addressed by various laws, rules and regulations under the watchful eyes of the NEC and local government. Bhutan has a very effective national level GRS (e-KaaSel: www.citizenservices.gov.bt). MoESD does not have a dedicated permanent grievance redress system for the program. To address the program related GBV issues, MoESD depends on the existing RGoB systems.

4.1.2. Core Principle 3

The principle applies in terms of the risks related to the health and safety of the workers, trainees and students and the community in the near vicinity during implementation of the training program. There is no tangible threat to health and safety on the trainees, students and the local community as the environmental threat footprint is very small and the risk rating is LOW. Whatever little threat exists in terms of e-waste and COVID 19 related wastes (PPE, mask, gloves etc.), these could be effectively managed. However, safety of ECCD students and facilitators will need to be ensured through adequate water supply, cleanliness of toilets and WASH facilities, providing menstrual hygiene facilities and universal access design principle.

4.1.3. Core Principle 5

The Program addresses the needs of the local communities, particularly women and girls from remote and inaccessible areas to acquire skill and employment and there are specific DLIs to ensure the progress on the issue.

SECTION V: DISCLOSURE AND CONSULTATIONS

5.1 Disclosure

This updated ESSA will be disclosed in-country and on the World Bank's external website, prior to formal appraisal of the relevant PforR, to serve as the basis for discussion and receipt of formal comments.

5.2 Stakeholder Consultations

Consultations with IAs, relevant institutions, Program affected peoples, experts, and beneficiaries are essential in the proper planning and preparation of development projects and Programs, to ensure effective identification and assessment of environmental and social effects, and to recommend measures to improve environmental and social management capacity. Stakeholder consultations are an integral part of the ESSA process and will be carried out consistent with applicable World Bank principles. The Bank has and would continue to engage in other formal and informal consultations as needed prior to finalization of this ESSA and the PforR. The points of discussions intended to collect information as an input for the following activities:

- i. Assessment of relevant environmental and social management systems related to the PforR principles
- ii. Assessment of the capacity and performance related to the environmental and social management procedures and processes relevant to the Program, and past performance on previous Bank Funded operations
- iii. Development of an action plan to enhance environmental and social management capacity and performance of the PforR Program; and
- iv. Development of performance monitoring and implementation support Program.

SECTION VI: RECOMMENDATIONS AND ACTIONS

6.1 Compatibility of MoESD's environmental and social systems

The ESSA presented in preceding sections identified the compatibility of the systems of MoESD's HCRRP and its AF and the core principles of E&S management for PforR investment. The assessment has found that the RGoB, MoESD's systems are largely compatible by policy and practice but identified some gaps in certain areas, which when addressed would lead to the effective implementation of HCRRP and AF. The ESSA, therefore, recommends addressing institutional capacity constraints and gaps across a range of issues. These recommendations are summarized as actions to be incorporated in the PAP. These options for improvement of the E&S management have been discussed with the implementing agencies.

6.2 Recommendation to Strengthen Implementing Agency's E&S Systems

The Program's interventions have **low environmental and social risks and impacts**. RGoB's environmental and social Laws, Acts and the Constitution address all related issues identified in the previous sections. Thereby, it can be deduced that the system under which both the IAs would implement the Program is robust enough to manage potential E&S risks and impacts.

But, given PforR implementation is new for MoESD, it is of paramount importance that both the Agencies address institutional strengthening and capacity building both for implementing the current Program (with Low environmental and social risk) as well for future Programs and Projects (with higher and more complex risk profile).

The ESSA, therefore, recommends addressing institutional capacity constraints and gaps across a range of E&S management systems. These recommendations are summarized as actions to be incorporated in the PAP (Table 2). These options for improvement of the E&S Management System have been discussed with the Implementing Agencies.

6.3 Assessment of MoESD's ES performance in the Parent Project

The MoESD developed the ESSA for the parent project and followed through the recommended actions as follows:

- Carrying out training of ES assessment and management with the assistance of Bank ES Team
- Carryout consultation with stakeholders and obtain feedback
- Assignment of ES and CE focal point
- Adoption of existing GRM and reporting on the same
- Adoption of COVID Protocols during interactions, classes, meeting etc.

Overall, the ES performance of MoESD has been satisfactory.

Table 1. Recommendation and Courses of Actions for MoESD including Measures Taken

| Objectives and Issues | Recommended Measures | Actions to be taken |
|---|---|--|
| Inclusion of E&S Specialist at the Implementing Agencies (IAs) | Designate/Assign Environmental and Social Consultant/Focal Point (with ES experience and background) for the Program. Related costs should be arranged from the Program budget. | ES Focal points engaged in parent project would continue to support activities under AF. |

| Objectives and Issues | Recommended Measures | Actions to be taken |
|---|--|---|
| Citizen Engagement (CE) and Stakeholder Engagement | The IA would appoint the ES focal point to look after communication issues. He/she will work with the Civil Society Organizations (CSOs) as directed by the IA and create citizen consensus on the program and communicate citizen's input to the IAs, thus closing the feedback loop. He/she will also assist IA in identifying and engaging various stakeholders, whenever necessary. Related costs should be arranged from the program budget. | ES focal point above will look after communication issues |
| Grievance Redress Mechanism (GRM) including addressing GBV issue | Use and strengthen existing Grievance Redress Mechanism (GRM) including addressing GBV Issues | Existing RGoB GRM is being used in the parent Program and would be continued to the AF |
| Strengthening of institutional capacity for safeguards management for the IAs | The MoESD PMU/PIU is implementing a program following PforR for the first time. Since the ministries would oversee the activities of E&S management of the program through their PMU/PIU, capacity building (through training on E&S management) of the personnel in the IA is a necessity. Training for ES personnel will be provided by the Bank if requested | Training on ES provided by WB ES team in person. Further training would be provided if necessary. |
| Actions at the TTIs and ECCD centers to offset the adverse effects of COVID-19 | To offset the adverse effects of COVID-19 during academic session/training period, the training institutes and ECCD centers must ensure physical distancing, use of PPE including gloves and mask by the trainers and the trainees alike. To offset space limitation, the training institutes/ECCD centers could run classes in a number of shifts (morning, noon, and afternoon). This needs to be weighed against availability of instructors and support staffs and overhead cost incurred in the process. MoESD IAs decision in this regard would guide the TTIs and ECCD centers. | COVID protocols being followed and would continue in the AF |
| ECCD Construction and WASH Facility Design | ECCD renovation and construction should follow good engineering practices including OHS. WASH Facility should be designed keeping in mind water requirement as well as adequacy of water sources. The water quality should be tested periodically against international standards. Toilets should be designed with universal accessibility features and maintained in a clean manner. | Design of ECCD centers and WASH Facilities should include the recommended measures |

SUPPORTING ANNEXES AND REFERENCE DOCUMENTS

References:

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12. <http://www.moh.gov.bt/ministry-of-health-plans-to-roll-out-the-vaccination-for-children-in-additional-three-districts/>
13. <https://kuenselonline.com/children-in-nine-dzongkhags-receive-covid-19-vaccine/>
14. <https://www.cseindia.org/waste-management-policy-in-bhutan-4584>
15. <http://nec.gov.bt/services/1>

ANNEX A: Consultation Meetings held while designing the Program by MoESD

MoESD and NEC

There had been a number of meetings with NEC, MoESD and the Bank staff till date that contributed to the development of the ESSA. Consultation was done both virtually and in person during the Bank team's visit to the Program area in December 2022. Table below shows the date, organization and who attended the meetings.

Table: Dates of Consultation Conducted during ESSA Preparation

| Sl. No. | Consulted With | Date | Officials/ People Participated |
|---------|--|--------------------------|--|
| 1 | National Environment Commission (NEC) | 06/04/2021 12/12/2022 | Choden Tshering Suiko Yoshijima S. M. Zulkernine Rekha Shreesh Md Anisuzzaman Bhuiyan Shabbir Ahsan Raisin Akhter Feroz |
| 2 | Ministry of Education and Skills Development (MoESD) | 30/06/2021 13/12/2022 | Sangay Yangchen T. M. Asaduzzaman S. M. Zulkernine Rekha Shreesh Md Anisuzzaman Bhuiyan Thelma Choi Raisin Akhter Feroz Fatema Samdani Roshni |

ANNEX B: Procedures for Seeking Environmental Clearance for New Programs

STEP 1

Procedure for seeking an Environmental Clearance (EC)

Check if the project requires EC

If the proposed project is listed under the “**Green Category**” then the activity will not be subjected to Environmental Assessment (EA) process. However, exempted activities must obtain approvals/clearances/development consents from concerned agencies as required under relevant Legislation.

1. If the proposed project is listed under the “**Blue Category**” then the activity shall be assessed at Initial Environmental Examination (IEE) level by Designated Competent Authority or National Environment Commission Secretariat (NECS) as applicable.
2. If the proposed project is listed under the “**Red Category**” then the activity will have to undergo Environmental Impact Assessment (EIA). The activities under the Red list shall be reviewed by the NECS.
3. If the proposed project is not listed under any of the above-mentioned categories, then the activity shall be assessed at IEE level and shall be reviewed and assessed by NECS.

STEP 2

The proposed project requiring EC will be subjected to Initial Environmental Examination (IEE) or Environmental Impact Assessment (EIA).

- **For blue category projects, the following shall apply:**
 4. Check Here whether specific IEE form is available for the proposed project. If yes, fill up those IEE forms. If no, fill up the IEE form for General Projects 2017.
 5. Submit duly filled IEE form to the concerned Competent Authorities (CAs) for review and assessment for delegated projects or forward the application to the relevant CAs or to the NECS if not delegated/listed under their competency.
 6. For red category projects the following shall apply:
- **For red category industrial projects, the following shall apply:**
 7. Check Here to download the EA form for red category industrial projects.
 8. Forward duly filled EA form to NECS through Environment Unit, Department of Industry, Ministry of Energy and Natural Resources.
- **For red category projects excluding industrial projects, the following shall apply:**
 9. An applicant submits the draft terms of reference (TOR) to the concerned CA for review and assessment.
 10. CA must forward the draft TOR to the NECS for endorsement.
 11. The NECS will issue the endorsed TOR to the applicant and share a copy with the CA.
 12. Based on the TOR endorsed by NECS, the applicant will prepare EIA report.
 13. The applicant will submit the EIA report to the CA. The CA will forward the EIA report to the NECS for review and assessment.

STEP 3

Assessment and Review of applications by CAs/NECS:

- Administrative staff or officer will review completeness of the application as per the Checklist for processing Environmental Clearance and Renewal.
- If the documents submitted are not in line with the checklist, communicate in writing to the applicant.
- If the documents submitted are in line with the checklist, remit application fees as per the Fee schedules to cover the cost of Administering the Environmental Assessment Act 2000 to the Accounts/Revenue Section who will issue Revenue Money Receipt (RMR).
- Submit a copy of RMR along with the application to CA/NECS.
- Administrative staff or officer will acknowledge the receipt of an application within 2 working days from the receipt of an application.
- Administrative staff or officers will maintain record of the application/project.
- Concerned officer will assign the application to a reviewing officer.
- For red category projects, the reviewing officer in consultation with the Head of the Environment Assessment and Compliance Division (EACD) will make a public announcement through the official webpage for one month for public comments.
- The reviewing officer shall declare conflict of interest, if any.

- Reviewing officer will assess the application as per Chapter III of Regulation for Environmental Clearance of Projects (RECOP) 2016, as follows:
 - Review the application as per the reviewer's guideline.
 - Conduct site visits. The Secretariat may also request relevant CA to conduct site visits where appropriate.
 - Seek additional information. If the applicant requests clarification on the additional information, provide clarification/assistance in person/or electronically. Concerned officer will verify and sign the letter seeking the additional information.
 - The applicant shall ensure that the additional information sought is submitted within **three months for blue category projects and one year for red category projects** from the date of request for additional information.
 - The reviewing officer will update on the status of the application.
 - Upon completion of the review process, the reviewing officer shall submit the application for decision.

STEP 4

Decision on EC by NECS

- The Chief, EACD will prepare an agenda for the Environment Assessment and Technical Committee (EATC) meeting, which is conducted fortnightly Tuesdays.
- The reviewing officer will prepare the EATC paper as per the EATC form and present to the EATC.
- The EATC will make a decision to issue/reject EC or subject the application for further studies and review.
- To make a decision on the application, a minimum quorum of two-third of its total members is required.
- The EACD will maintain minutes of the EATC meeting inclusive of project details, EATC decision and follow up action.
- For red category projects, public announcement will be made as per Section 28 of the EA Act 2000.
- Communicate the decision of the EATC to the applicant:

- If EC is approved, the reviewing officer will seek legal undertaking from the applicant within seven working days from the date of decision. Also, provide an update to administrative staff on the status of the application.
- If legal undertaking is received within seven days, issue EC.
- If legal undertaking is not submitted within the deadline, the application will be referred back to the EATC for directive.
- Any appeal regarding decision on EC may be dealt in line with section 86 of RECOP, 2016.
- The EATC may subject those projects submitted using IEE forms to EIA. In such a case, the applicant shall follow Step 2 (b) above.

STEP 5

After issuance of EC (NECS)

- Hand over project file/application file to administrative staff for further action (updating EC register, record keeping and archiving).
- EACD shall prepare/develop monitoring plans and accordingly conduct compliance monitoring of the projects. Tour reports from the compliance monitoring will be verified by the Chief and filed by administrative staff.
- In case of non-compliance or violations, take the following actions as per Chapter VII of RECOP 2016:

ANNEX D: Procedures for seeking environmental clearance for New Projects

Source: <http://www.nec.gov.bt/services/1>

ANNEX C: Summary of Stakeholder Consultations

MoLHR - 20 and 21 October 2021 and MoESD - 28 October 2021; Virtual meeting

Time: 10:00 AM to 11:00 AM

The World Bank, Dhaka Office ESSA Team conducted a virtual stakeholder consultation on 20 and 21 October 2021 with different stakeholders including the MoLHR officials. MoLHR's Department of Technical Education Specialist Mr. Sangay Dorji made a short presentation of the Skills Development Plan of the RGoB to bring the audience on the same footing. Following his presentation, the Bank team made another presentation to educate the audience on the findings of the ESSA and the suggested actions to be included in the Project Action Plan. Later the meeting was opened for discussion. The same sequence was followed with stakeholder consultation where MoESD and related stakeholders participated from 10 am to 11 am on 28 October 2021. Ms. Sangay Yangchen, the focal point of MoESD made a short presentation informing the audience about the MoESD run ECCD program under PforR. Five stakeholders asked different questions; six questions were directed towards MoLHR while five questions were directed towards MoESD matters affecting the program. Officials from the MoLHR, MoESD and World Bank ESSA team replied.

The main discussion issues and reply given are narrated below:

Key discussion issues and replies in the Meeting -MoLHR 20 and 21 October 2021

| Sl. No. | Name and Appointment | Issue Raised | Reply from Ministry/ESSA Team |
|----------------|--|---|--|
| 1. | Ms. Tashi Wangmo, Specialist, Livelihood Project Respect, Educate, Nurture & Empower Women (RENEW) 20 October 2021 | Whether any private organization/NGO would be involved with Waste Management or not? GBV cases are something that the Bhutanese society lives with. Did the Bank staff physically evaluate the capacity of the RGoB and the ministry in having an effective GRM and handling GBV issues? | Mr. Sangay Dorji, Specialist, Department of Technical Education, MoLHR replied that MoLHR has carried out a survey between 7 - 16 June 2021 where 89 TTIs have been selected in view of the institutes' readiness in terms of space, faculty, facilities, and equipment for implementing the SDP program. This also includes their capability to handle industrial, medical and municipal waste. As such waste management would be handled under the existing Waste Prevention and Management Regulation (2012) that promotes the principles of 3Rs (reduce, reuse, and recycle). On the GRM and GBV matters, the bank staff informed that owing to movement restrictions by RGoB and the Bank, the ESSA team could not visit Bhutan to have on ground assessment on these matters. However, there were extensive discussions with the ministries on the matter. The RGoB, on 26 December 2017, launched an online grievance redressal system where people can express their dissatisfaction, problems and provide feedback on public services offered in the country. Known as |

| Sl. No. | Name and Appointment | Issue Raised | Reply from Ministry/ESSA Team |
|---------|--|--|---|
| | | | eKaaSel , the system has been developed to serve as a one-stop platform with the primary objective of streamlining the grievance redressal aspect of service delivery through an online channel of communication. The system is very effective and the citizens are satisfied with its outcome. On SEA/SH and GBV related matters, there exists a number of channels of reporting incidents. These include: Royal Bhutan Police, the NCWC, health or counselling services or any relevant Civil Society Organization. Walk-in complaints, reporting by telephone and complaints through the Toll-Free Helplines of RBP (113) and the NCWC (1098). It is heartening to note that MoLHR has developed a 'Stand Alone' GRM including an online platform that would also address GBV and SEA/SH matters. MoESD is also encouraged to adopt similar measures as adopted by MoLHR. |
| 2. | Karma Sonam, Director, Rural Development Training Center, MoAF 20 October 2021 | What would be the Reporting Mechanism for initiating implementation reports? Would it be centralized at the ministry level? What would be the role of TTCs/Training Institutions? | Mr. Sangay Dorji, Specialist, Department of Technical Education, MoLHR informed that the matter will be handled by the ministry centrally and it will not trickle down to the implementation level. |
| 3. | Tshewang Lhamo, Senior Program Officer, NCWC | If the courses have been identified based on Gender Disaggregated Data or not. How conducive would be the training environment to reduce the risk of dropouts by female participants? | Mr. Sangay Dorji, Specialist, Department of Technical Education, MoLHR informed that the courses have been identified not only following gender disaggregated data but a lengthy exercise was conducted by MoLHR on Skill Development Plan (SDP), Build Bhutan Project (BBP), and the Youth Engagement and Livelihood Program (YELP) and Technical and Vocational Education and Training (TVET) beside taking inputs from the potential job providers so to increase chances of employability upon completion of training. The Cabinet has already approved the courses and the youth including women, adolescent girls would be benefitted from these courses. The TTIs have already been instructed to maintain a conducive environment at the Training Centers so that there is no dropout of |

| Sl. No. | Name and Appointment | Issue Raised | Reply from Ministry/ESSA Team |
|--|--|--|--|
| | | | female trainees for mismanagement on the part of the TTIs. |
| <p align="center">Key discussion issues and replies in the Meeting – MoESD</p> <p align="center">28 October 2021</p> | | | |
| 1. | Pema Tshomo, Representative UNICEF | <p>UNICEF wanted to be included in the project as they too are implementing a program called a multi-sectoral roadmap and wanted clarifications on whether the current plans for the ECCD were part of this multi-sectoral roadmap, or whether this was a separate project.</p> <p>Is the National ECCD Plan different from the National Multisectoral Strategic Action Plan?</p> | Mr. Karma Gayleg, ECCD, MoESD replied to the question. He informed that the National ECCD Action plan originates from the National Multisectoral Strategic Action Plan. MoESD is addressing the ECCD program financed by the World Bank. |
| 2. | Lham Tshering, Thimphu Dzongkhag | <p>The ECCD program is being scaled up. However, ECCD centers do not have adequate facilitators to conduct the program. How about somebody from RCSC appointing facilitators for the program in the rural areas?</p> <p>Dzongkhag Education Officers (DEOs) are concerned because of non-operational ECCD centers around the country. Around 150 ECCDs are still vacant. How the MoESD is planning to address the Environmental and Social concerns of the ECCD program?</p> | <p>Mr. Karma Gayleg, ECCD, MoESD informed the House that this is truly a genuine concern that is haunting MoESD too. As of now some 150 ECCD centers are not operational for over a year. MoESD is presently engaging with the Royal Civil Service Commission (RCSC) and Ministry of Finance (MoF). MoESD is working out an arrangement to balance fund within the ministry to recruit facilitators. MoESD is also working on how these funds could be re-allocated.</p> <p>Mr. Karma noted that MoESD is working with NCWC and MoH on matters of strengthening Health, Nutrition and Protection issues of the students of ECCD and others associated with the program. He informed that MoESD is working on attaining the environmental benchmark at the ECCD centers. Reliance on PLASTIC TOYS have already been reduced and MoESD is promoting self-reliance whereby things acquired from Bhutan are given preference as training aids.</p> |

| Sl. No. | Name and Appointment | Issue Raised | Reply from Ministry/ESSA Team |
|---------|------------------------------------|--|--|
| 3. | Pema Tshomo, Representative UNICEF | <p>What would be criteria for selecting E&S and Communication Specialists in the IAs as suggested in the ESSA recommendations?</p> <p>How is the IA constituted?</p> | <p>The bank staff replied that these specialists are recommended to be employed from the program fund to act as a bridge between the ministry and the field level and feed the ministry on violations/risks involving environmental and social matters. The Communication specialist would also act as a bridge between the ministry and the CSO/CBO and the community and educate the community of the program of the ministry and give feedback to the ministry on people's perception of how efficiently the program is managed.</p> <p>When agreed upon, MoESD would advertise specifying selection criteria and academic qualifications through a "Terms of Reference" for the Specialists. The Bank Staffs are ready to support the ministries in this regard.</p> <p>The bank staff informed that this was solely the issue of MoESD. Work of IA is an operational matter. Generally, a Project Director (PD) is chosen and he/she is assisted by a Deputy Project Director (DPD) and other staff. The specialists report to the IA for their action. The Bank Task Team Leader (TTL) works out the monitoring and evaluation (M&E) mechanism of the program with the ministries.</p> |

List of Key Stakeholders Consulted -MoLHR 20 Oct 2021

| Sl. No. | Name | Designation | Organization/Agency |
|---------|-----------------|---------------------|--|
| 1 | Sangay Dorji | Specialist | Department of Technical Education, MoLHR |
| 2 | Damcho Thinley | Sr. Program Officer | Department of Technical Education, MoLHR |
| 3 | Kezang Pelden | Program Officer | Department of Technical Education, MoLHR |
| 4 | Pelden Tshering | Training Director | JWPTI-Dekiling, MoLHR |
| 5 | Kinley Penjor | Principal | College of Zorig Chusum, Trashiyangtse |
| 6 | Youten Pelzang | Principal | Technical Training Institute-Khuruthang |
| 7 | Sonam Wangdi | Principal | Technical Training Institute-Rangjung |

| | | | |
|----|-----------------|---------------------|--|
| 8 | Sonam Wangmo | Principal | Technical Training Institute-Thimphu |
| 9 | Pema Tshering | Principal | Technical Training Institute-Chumey |
| 10 | Sangay Tshewang | Principal | Technical Training Institute-Samthang |
| 11 | Karma Sonam | Director | Rural Development Training Center, MoAF |
| 12 | Chimi Dema | Lecturer | Paro College of Education, RUB |
| 13 | Ugyen Dorji | Lecturer | Royal Institute for Tourism & Hospitality |
| 14 | Tsendup Zangmo | Instructor | Agricultural Machinery Training Center, MoAF |
| 15 | Pem Lham | Instructor | Agricultural Machinery Training Center, MoAF |
| 16 | Pema Loday | Adm. Officer | Agency for Promotion of Indigenous Crafts |
| 17 | Tashi Wangmo | Specialist | Respect, Educate, Nurture & Empower Women (RENEW) |
| 18 | Pema Chopel | Program Officer | Royal Textile Academy (RTA) |
| 19 | Rinchen Namgay | Program Coordinator | Ugyen Wangchuck Institute for Conservation & Environment Research (UWICER) |
| 20 | Bikash Rai | Program Coordinator | Thimphu TechPark |
| 21 | Tandin Wangmo | Consultant | World Bank |

21 Oct 2021 - MoLHR

| Sl. No. | Name | Designation | Organization/Agency |
|----------------|------------------|---------------------|---|
| 1 | Sangay Dorji | Specialist | Department of Technical Education, Ministry of Labour and Human Resources |
| 2 | Damcho Thinley | Sr. Program Officer | Department of Technical Education, Ministry of Labour and Human Resources |
| 3 | Kezang Pelden | Program Officer | Department of Technical Education, Ministry of Labour and Human Resources |
| 4 | Tandin Wangmo | Consultant | World Bank |
| 5 | Tenzin Wangchuk | Manager | Bhutan Chamber of Commerce and Industry |
| 6 | Choki Gyeltshen | Manager | Bhutan Chamber of Commerce and Industry |
| 7 | Tenzin Gyeltshen | Program Officer | National Film Commission |
| 8 | Sonam Tobgay | Legal Officer | National Film Commission |

| | | | |
|----|-------------------------|-------------------------------|--|
| 9 | Singye Wangmo | Chief Program Officer | National Film Commission |
| 10 | Dechen Tshering | Chief Post Production Officer | National Food |
| 11 | Ugyen | Director | Greener Ways |
| 12 | Tshewang Lhamo | Sr. Program Officer | National Commission for Women and Children |
| 13 | Keshab Pradhan | Acting Executive Director | Guide Association of Bhutan |
| 14 | Drungtsho Sangay Wangdi | Dean | Faculty of Traditional Medicine |
| 15 | Sonam Jamtsho | Head, Infra Division | Construction Development Corporation Limited |

List of Key Stakeholders Consulted -MoESD 28 Oct 2021

| Sl. No. | Name | Designation | Organization/Agency |
|---------|---------------------|------------------|------------------------|
| 1 | Sherub Phuntsho | Chief ECCD & SEN | MoESD |
| 2 | Karma Gayleg | ECCD & SEN | MoESD |
| 3 | Yeshey Lhendup | | DSE |
| 4 | Sangay Tshering | | DCPD |
| 5 | Phuntsho Norbu | | DCPD |
| 6 | Tshering Penjor | | Haa Dzongkhag |
| 7 | Pema Tshomo | | Representative, UNICEF |
| 8 | Lham Tshering | | Thimphu Dzongkhag |
| 9 | Yeshey Lham | | NCWC |
| 10 | Sangay Yangchen | | PPD |
| 11 | Sonam Choden Wangdi | | World bank Consultant |

Consultation During WB Teams Visit to Bhutan 12-14 Dec 2022 (including discussion on ESSA for AF)

The World Bank Team, comprising of the TTL and the Environmental and Social ADMs visited the Program area and had a number of meetings with MoESD counterpart and the NEC officials. The

team also visited a number of ECCD centers in various locations including meeting with ECCD facilitators. Discussion focused on the following:

During the visit to ECCD sites the team conversed with ECCD facilitators who presented various aspects of ECCD management including children enrolment, curriculum, intended outcome, prospects and challenges. The ECCD facilitators requested for capacity development training for better delivery. The ECCDs are simple one-story structures with local materials which will be replicated by future ECCDs. There are classrooms for children, toilets and WASH facilities. These are located in and around localities for easy access by students and parents. A number of ECCDs require refurbishment.

A meeting with the MoESD officials and the Bank team was held. Discussion centered around the Additional Financing activities including the management and operations of ECCDs. Teachers, facilitators recruitment and training was discussed. The construction modalities and policies of ECCD centers was also presented. Bank team also discussed the likely ES risk and impacts for the construction of ECCD and WASH facilities which was deemed Low.

The Team also met the NEC officials who are responsible for overseeing environmental clearance, implementation of environmental regulations etc. It was informed that the ECCDs would be under green category and hence the clearance may not be needed. Various aspects of clearance procedure under RGoB laws were also illustrated by the officials. Consultation also included the proposed AF and the risks and impacts related to the AF.

A training session for the MoESD officials was also arranged by the Bank team on PforR and ESF/IPF requirements. The Bank team provided a comprehensive overview of the ESF and PforR as part of the capacity enhancement measures which included discussion on AF and the preparation of ESSA for the AF. The Bank team assured the Client of extensive cooperation for ES capacity building measures, document development and implementation.

Consultation with MoESD Officials, ECCD Facilitators and Students on AF and the Preparation of ESSA (Mar 01, 0223)

The World Bank Team, comprising the TTL and the Environmental and Social ADMs had a meeting with the ECCD Facilitators, Students and MoESD Officials to discuss AF and the development of ESSA. The discussion included the ECCD center construction, WASH Facilities and the possible ES risks and impacts and mitigation measures.

The students and the Facilitators wanted better WASH Facilities with running water and sanitation. They also requested the access road be repaired where necessary. A request was also made to use sign posts as well as refurbishment of walls where required in old ECCD centers.