

**KINGDOM OF CAMBODIA  
NATION RELIGION KING**

**Ministry of Youth, Education and Sport  
Project ID: P162971**

## **HIGHER EDUCATION IMPROVEMENT PROJECT (HEIP)**

### **ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK**

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## LIST OF ACRONYMS

<b>AEC</b>	Asean Economic Community
<b>DIA</b>	Designated Implementing Agency
<b>DSR</b>	Department of Scientific Research
<b>FDI</b>	Foreign Direct Investment
<b>EA</b>	Environmental Assessment
<b>ESP</b>	Education Strategic Plan
<b>EP</b>	Equity Plan
<b>ECOP</b>	Environmental Code of Practice
<b>ESHS</b>	Environmental, Social and Health and Safety
<b>ERC</b>	Education Research Council
<b>ESMF</b>	Environmental and Social Management Framework
<b>ESMP</b>	Environmental and Social Management Plan
<b>FM</b>	Financial Management
<b>FPIC</b>	Free, Prior and Informed Consultation
<b>ITC</b>	Institute of Technology of Cambodia
<b>HEI</b>	Higher Education Institution
<b>HEIP</b>	Higher Education Improvement Project
<b>IDA</b>	International Development Association
<b>IP</b>	Indigenous Peoples
<b>IPP</b>	Indigenous Peoples Plan
<b>IPPF</b>	Indigenous Peoples Planning Framework
<b>M&amp;E</b>	Monitoring and Evaluation
<b>MOE</b>	Ministry of Environment
<b>NGO</b>	Non-Governmental Organizations
<b>OP</b>	Operational Policy
<b>PAH</b>	Project Affected Households
<b>PAP</b>	Project Affected Persons
<b>PMC</b>	Project Management Committee
<b>PMO</b>	Project Management Office
<b>PMT</b>	Project Management Team
<b>PT</b>	Project Team
<b>RUA</b>	Royal University of Agriculture
<b>RGC</b>	Royal Government of Cambodia
<b>RUPP</b>	Royal University of Phnom Penh
<b>STEM</b>	Science, Technology, Engineering, Mathematic
<b>TOR</b>	Terms of Reference
<b>UHS</b>	University of Health and Sciences
<b>WB</b>	World Bank
<b>WBG</b>	World Bank Group

# CAMBODIA HIGHER EDUCATION INSTITUTIONS CAPACITY IMPROVEMENT PROJECT

## ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

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### 1. PROJECT DESCRIPTION

Realizing education's potential to spur growth is a priority for Cambodia. The country's National Socio-Economic Development Plan (2014-2018) and Industrial Development Policy (2015-2025) call for creating a competitive economy through knowledge and innovation. Strong export performance has been sustained with manufacturing exports growing about 16 percent p.a. in real terms over the 2000-2014 period. This success has been built largely on the expansion of relatively low-technology, low wage/skill production in such industries as textiles, apparel, and basic electronics, and sustained by a steady flow of foreign investment.

However, Cambodia's comparative advantage in these industries will be eroded as wages rise unless productivity rises as well. So, to maintain growth prospects in the long term, the country will need to maintain its competitiveness and move up the value chain to produce more sophisticated knowledge intensive products. This means exploiting opportunities to create new business and expand jobs for Cambodian among the backward- and forward-linkages, especially to the FDI-financed export industries. Moving from low-wage cut and assembly to design, manufacturing systems control engineering, identification and provision of related products (packaging, marketing, inexpensive back-office services, among others) requires employees with high-quality, relevant skills for the sector. To create these skills, Cambodia must address an increasingly serious mismatch in the types, amounts, and quality of scientific, technical, and managerial/organizational skills among tertiary graduates.

Therefore, to overcome the above mismatch, the Government of Cambodia has requested IDA financing from the World Bank for Higher Education Improvement Project (HEIP). *The project development objectives are to improve the quality, relevance and equity of education and research at targeted higher education institutions, improve governance in the sector, and to provide immediate and effective response in case of an eligible crisis or emergency.* There are two main components and sub-component of the proposed project include:

Component 1: Improving STEM and Agricultural Teaching, Learning, and Research (approximately US\$ 80 million equivalents through traditional input-based disbursement approach)

This component aims to enhance quality of teaching and research capacity of selected HEIs in the fields of science, technology, engineering, mathematics (STEM), and agriculture, while other complementary areas deemed necessary for economic development would also be supported. The proposed sub-components are: 1.1: Improving teaching and learning, 1.2: Improving research, and 1.3: Improving Institutional Capacity. A private sector advisory board will be involved in the formulation and implementation of the sub-components 1.1 and 1.2 to improve the relevance of activities.

This component will support six target HEIs that have potential to produce graduates in response to labor market needs. These include: four HEIs that have substantial experience of delivering quality outputs in these priority areas and two provincial HEIs near Cambodia's Special Economic Zones (SEZs), which directly support industrial diversification in the country. The institutions include: The Institute of Technology Cambodia (ITC), the Royal University of Agriculture (RUA), the Royal University

of Phnom Penh (RUPP), the Svay Rieng University (SRU), University of Battambang (UBB), and University of Health Science (UHS).

Sub-component 1.1: Improving Teaching and Learning (approximately US\$ 60 million equivalent through traditional input-based disbursement approach). This sub-component aims to improve the quality of teaching and learning in target departments within the six HEIs based on Institutional Improvement Plans (IIP). Through partnership agreements with international/domestic HEIs, this sub-component will improve three main areas: curriculum, faculty, and facilities. In addition, the partnership agreement will support the establishment of new post-graduate programs. The Partner HEI will review and revise the curriculum in collaboration with industry, and new teaching and learning materials will be provided. Faculty members' qualification will be upgraded through a range of programs with partner HEIs. Facilities will be improved through: (a) construction and rehabilitation of university buildings, laboratories, and classrooms; and (b) equipment, learning materials, and office supplies. The partnership agreements are expected to entail (a) technical assistances for curriculum review and facility assessment, (b) provision of short courses, twinning programs, mentoring programs, and (c) implementation of collaborative research and faculty exchanges.

Subcomponent 1.2: Improving Research (approximately US\$ 12 million equivalent through traditional input-based disbursement approach). This sub-component aims to improve the quality and relevance of research in STEM and agricultural fields by supporting HEIs to develop and implement research projects that result in peer reviewed publications. Research projects, implemented by teams of researchers from target HEIs are selected and approved by HEIP, will be designed and/or implemented in collaboration with industrial partners, international HEIs, and/or generate scientific evidence for public policy making. The project will finance: research equipment and facilities/laboratories; research consumables; research operation costs; and researcher incentives. The researcher incentives will be financed by counterpart funds.

Subcomponent 1.3: Improving Institutional Capacity (approximately US\$ 8 million equivalent through traditional input-based disbursement approach). This sub-component aims to improve the internal and external accountability of the six target HEIs as well as increase equity. Accountability is improved by strengthening the institutional governance, the capacity of financial and human resource management, and monitoring of graduates' participation in the labor market. Equity is improved by supporting students from disadvantaged backgrounds who study in Phnom Penh. This sub-component will finance technical assistance, equipment, training, operational costs, and construction (e.g. student dormitory) in line with IIP. Through these activities, HEIs are expected to improve institutional capacity in line with the accreditation standards; produce consolidated annual financial reports and tracer studies to be accountable to the Royal Government of Cambodia, industry, and other external stakeholders. The completion rate of disadvantage students is also expected to rise because of the subsidized or free accommodation in Phnom Penh.

Component 2: Strengthening Sectoral Governance and Project Management (approximately US\$10 million equivalent).

This component aims to strengthen the system of higher education sector to produce graduates equipped with transferable skills and knowledge, especially in STEM and agriculture. The proposed sub-components are: 2.1: Strengthening sectoral governance, and 2.2: Project management and monitoring and evaluation.

Sub-component 2.1: Strengthening Sectoral Governance (approximately US\$8 million equivalent). This component aims to strengthen the system of higher education through the improvement of quality assurance mechanisms; expansion of information systems; and support the development of legislation for autonomous HEIs. The sub-component will specifically support (a) the implementation of institutional accreditation; (b) the development of quality assurance guidelines for HEIs; (c) the expansion of HEMIS to be used for policy and planning; and (d) provision of technical support to develop/process needed policy documents including HEI autonomy, PhD standards, Human Resource Master Plan. These areas will build on the strategic setting developed by MoEYS as well as the sectoral foundations supported by HEQCIP. These activities will be implemented by DGHE and the ACC.

Connecting the EEP to the country financing system of MoEYS staff salaries ensures (a) that the series of trainings under this sub-component will support active MoEYS staff who are on the payroll; (b) government ownership of the sub-component's activities as they will be designed and implemented by MoEYS and monitored closely by MEF, (c) the sustainability of these programs as they will be financed by government funds, and (d) the flexibility of these two programs for future expansion with additional donor funding. In short, this arrangement seeks to support greater ownership and focus on results by using the country's system in the financing of this sub-component activities while targeting the Bank's implementation support to their outputs and outcomes through DLIs results-based financing mechanism and streamlined judiciary design.

Sub-component 2.2: Project Management and Monitoring and Evaluation approximately (US\$ 2 million equivalent through traditional input-based disbursement approach). This sub-component will support day-to-day implementation, coordination, and management of project activities on planning and execution, financial management (FM), procurement, supervision and reporting, internal and external audits, environmental and social safeguards management, and monitoring and evaluation. These activities will ensure efficient project management and early identification of corrective measures to solve implementation problems. In addition, this component will provide necessary vehicles, training/workshops, logistics and operational costs, data collection survey, and critical/strategic technical assistance (TA) to the relevant MoEYS departments and HEIs.

To support monitoring and evaluation of project activities and sector wide indicators, the project will strengthen the existing mechanisms for monitoring and data collection, and supporting project specific data collection when needed. This component will finance TA and training, and the development and use of monitoring tools to the monitoring and evaluation offices in targeted HEIs and DHE.

## **2. PURPOSE OF ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)**

The purpose of the ESMF is to identify and address measures to avoid and minimize environmental and social impacts, as much as possible, and where they cannot be avoided, the impacts are adequately identified/assessed and necessary mitigation measures designed and implemented following relevant Cambodia environmental and social legislation and the World Bank's safeguards policies.

The implementation of projects will be subject to the processes defined in this ESMF. The ESMF defines how safeguards will be taken into account and managed for all project activities that may have safeguards requirements. During implementation, the project activities with potential safeguard issues

will be screened to determine the scope and types of safeguards instruments that would be required. When the location of the project is defined, site specific EMP and Equity Plan (EP) need to be developed.

This ESMF identifies the responsibilities of project stakeholders, procedures for environmental and social safeguards screening, review and approval, monitoring and reporting requirements, GRM at national and local level as well as plans to enhance institutional capacity. The ESMF serves as an overarching environmental and social safeguards instrument to provide the framework for safeguards implementation to mitigate negative social and environmental consequences from construction activities as well as the need for screening and developing specific tools for sub-project monitoring.

### **3. RELEVANT PROJECT ENVIRONMENTAL AND SOCIAL CONTEXTS**

The project will be carried out in four Higher Education institutions (HEIs) in Phnom Penh. At the end of this assessment and the development of the ESMF, client requested to Bank to add two new provinces in the project scope, known as Battambang and Svay Rieng, which the inclusion of new locations may alter the nature of this ESMF. As this drafting of ESMF is advancing, the team suggested that further discussion with client on types and nature of the investment in the two new provinces will be explored during pre-appraisal mission scheduled for mid of October 2017, and the update of this instrument will be finalized and disclosed before appraisal.

The proposed project will involve technical assistance and capacity building activities to promote STEM and agricultural education, as well as strengthening the higher education system. While the activities to improve academic physical facilities, under sub-component 1.1, will involve civil works, the locations and designs of these investments will not be known before project appraisal stage. However, the four selected institutions are visited during August-September 2017 for rapid environmental and equity assessment of the proposed activities such as Royal University of Agriculture (RUA), University of Health and Science (UHS), Institute Technique du Cambodge (ITC), and Royal University of Phnom Penh (RUPP). As of end of August 2017, i.e., when this assessment has already been commenced, the project added two new provinces in the scope (Svay Rieng and Battambang Province). However, the type and scale of investment is not known. Thus, this ESMF is subject to further update when the task team obtains sufficient information during pre-appraisal mission schedule for October 2017.

During the project identification mission, it was identified that two Bank's safeguards policies including environmental assessment (OP/BP 4.01) and Indigenous peoples (OP/BP 4.10) are triggered. The adverse environmental impacts are deemed to be minor, temporary and site specific which can be mitigated through applying good construction practices. While the project is to benefit individuals who may belong to ethnic minority groups by facilitating their access to higher education, the equity assessment and equity plan has been prepared in order to comply with the requirements in the OP/BP 4.10. Thus Environmental and Social Management Framework (ESMF) was developed for the project. ESMF included Environmental Code of Practices (ECoPs) and Equity Plan (EP). In addition, site specific environmental management plan (EMP) would be prepared if locations for the sub-projects are defined.

The findings of the field assessments were reported in separate reports and enclosed in annexes of this ESMF. The proposed project, however, has no anticipation of resettlement issue since all four HEIs have their own land for construction, and no land acquisition, business disruption, will be involved at the assessment time. But if there is a possibility that such impacts occur, the World Bank's operation policy on involuntary resettlement (OP 4.12) applies, and resettlement action plan (RAP) would need to be prepared.



## 4. REGULATORY AND INSTITUTIONAL FRAMEWORK

### 4.1 CAMBODIA REGULATORY FRAMEWORKS

**Cambodia Constitution (1993)** supports the right to education, Education for All and 9 years basic education (Article 65, 66, 67 and 68). Article 48 states “the State shall protect the rights of children as stipulated in the Convention on Children, in particular, the right to life, education, protection during wartime, and from economic or sexual exploitation.” Article 46 states “the state and society shall provide opportunities to women, especially to those living in rural areas without adequate social support, so they can get employment, medical care, and send their children to school, and to have decent living conditions.” Article 31.2 stipulates that “Khmer citizens shall be equal before the laws and shall enjoy the same rights, freedom and duties, regardless of their race, color, sex, language, beliefs, religions, political tendencies, birth of origin, social status, resources, and any position”.

**National Policy on the Development of Indigenous People:** The Policy was approved by the Council of Ministers on April 24, 2009 and sets out government policies related to indigenous peoples in the fields of culture, education, vocational training, health, environment, land, agriculture, water resources, infrastructure, justice, tourism and industry, mines and energy. One of its policy objective is to provide at least basic education (complete 9 years of education) to all indigenous people and provide suitable vocational training and skill based on need of the geographical location of their community.

**Sub-decree No. 174 on Provision of Scholarship to students in public institutes** approved on May 5, 2014. The Sub-decree aims at providing scholarship and stipend for some students who undertaken their study. The scholarship will be given to i) outstanding students, ii) orphanage students, iii) students from indigenous families, and iv) students from poor families. In principle 60% of the scholarship are given to outstanding students; 20% given to female students; 15% given to poor students; and 5% given to remote students.

**National Strategic for Development Plan (2014-2018).** NSDP is carrying forward the agenda of Rectangular Strategy Phase 3, which as unfolded in September 2013. Education and Gender Equity is among the core strategy. The ultimate goal of the NSDP is to fight poverty in Cambodia and move Cambodia economy from low income to middle income country in 2030.

**Sub-decree on Environmental Impact Assessment Process (EIA), 1999:** The sub-decree is to determinate and Environmental Impact Assessment upon every private and public project or activity and determine the size of the proposed project (s) and activities including existing and on-going activities in both private and public prior to undertaking the process of EIA. This sub-decree also encourages public participation in the implementation of EIA process and taking into account of their conceptual input and suggestion for re-consideration prior to the implementation of any project.

**Sub-decree on Air Pollution Control and Noise Disturbance, July 2000:** Article 1: The purpose of the sub-decree is to protect the environment quality and public health from air pollution and noise pollution through and curb and mitigation activities.

Article 7: The standard of noise emission from various sources like vehicle, manufacturing place and the standard for minimum noise emission for public and residential areas shall be specified in the Annex 5, 6 and 7 of this sub-decree.

Article 12: This article stated that “The discharge or leakage or various flammable substance, fuel-oil, radio active or chemical substance into the atmosphere, water and soil shall be strictly prohibited”.

**Sub-decree on Solid Waste Management, April 1999:** The purpose of this sub-decree is to regulate the solid waste management with proper technical manner and safe way in order to ensure the protection of human health and the conservation of biodiversity. This sub-decree applies to all activities related to disposal, storage, collection, transport, recycling, dumping of garbage and hazardous waste.

**Sub-decree on Water Pollution Control, April 1999:** This sub-decree is to regulate water pollution control in order to prevent and reduce the water pollution of public water areas so that the protection of

human health and the conservation of biodiversity should be ensured. It applies to all sources of pollution and activities that cause pollution of public water areas.

Article 8: Disposal of solid waste or any garbage or hazardous substances into public water areas or into public drainage system shall be strictly prohibited.

Article 9: The discharge of sewerage from dwelling and public buildings into public water areas without passing through public sewerage system or other treatment system shall be strictly prohibited.

Article 10: The discharge or transport of wastewater from any sources of pollution to other places for any purpose is subject to prior permit from the Ministry of Environment (MoE). The application for this permit shall be copied to the concerned ministries or agencies. (Annex 3: type of pollution sources required having a permission from MoE before discharging or transporting their wastewater: Laboratory and research center).

**Labor Law, March 1997:** Article 229: All establishments and work places must always be kept clean and must maintain standards of hygiene and sanitation or generally must maintain the working conditions necessary for the health of the workers.

Article 230: All establishments and work places must be set up to guarantee the safety of workers. Machinery, mechanisms, transmission apparatus, tools, equipment and machines must be installed and maintained in the best possible safety conditions. Management of technical work utilizing tools, equipment, machines, or products used must be organized properly for guaranteeing the safety of workers. The Prakas covered in Article 229, shall also determine the measures for enforcing this article, particularly regarding:

- risks of falling;
- moving heavy objects;
- protection from dangerous machines and apparatus;
- preventive measures to be taken for work in confined areas or for work done in an isolated environment;
- risks of liquids spilling; and
- fire prevention.

**Law on Social Security, August 2002:** Article 1: This law aims at organizing the Social Security Schemes for persons defined by provisions the provisions of the Labour Law of the Kingdom of Cambodia as follows:

- 1- Pension scheme which is in charge of providing old age benefit, invalidity benefit and survivors' benefit.
- 2- Occupational risk which is in charge of providing employment injury and occupational disease benefit.

The other contingencies shall be subsequently determined by Sub-decree base on the actual situation of the national economy.

Article 15: Benefit for occupational risk are:

- a- Medical care services for occupational risk caused by employment injury or commuting accident or occupational diseases whether the accident interrupt the work or not.
- b- Provide daily allowance for employment injury or commuting accident or occupational diseases causing temporary disability.
- c- Provide disabled pension or allowance for employment injury or commuting accident or occupational diseases causing permanent disability.
- d- Provide funeral benefits and survivors' pension.

## 4.2 APPLICABLE WORLD BANK SAFEGUARD POLICIES TRIGGERED BY THE PROJECT

With focus on sustainability of the project, and considering the fact that Government's safeguards policies are at premature stage (for example EIA sub-decree is being revised), the client (MoEYS) suggested that Bank's safeguards policies and procedure are applied for this HEIP project. At the stage of the project appraisal, location and design are not yet determined, an ESMF serves as safeguards mechanism to provide assurance that due consideration has been given to potential project impacts.

For referencing, the WBG classifies sub-projects into four safeguard policy categories, depending on the type, location, sensitivity, scope and scale of the project as well as the nature and magnitude of potential environmental and social impacts.

**Category A:** applied to proposed sub-projects where development is likely to have significant adverse environmental and social impacts that are sensitive, diverse or unprecedented.

**Category B:** applied to proposed sub-projects which have the potential for adverse environmental impacts on human populations or environmentally important areas (i.e., wetlands, forests, grasslands, and other natural habitats) but are less adverse than those of "Category A" projects. These impacts are site-specific; few if any of them are irreversible; and, in most cases, mitigation measures can be designed. Category "B" sub-projects are guided by applicable Bank safeguard instruments similar to Category "A" but with narrower scope.

**Category C:** applied to proposed sub-projects which have minimal or no adverse environmental and social impacts. In this case, Bank safeguard instruments do not apply and only periodic site environmental screening would be conducted.

**Category F1:** the proposed tripartite HEIP Project will be funded through a Bank financial intermediary, the International Development Association (IDA), and proposed sub-projects may have significant, yet unknown, environmental and social impacts. Consequently, the appropriate safeguard instrument is an Environmental and Social Management Framework (ESMF). The ESMF provides an overarching safeguards policy guideline document governing the approach, processes and specific instruments to be used during sub-project appraisal.

This project is classified as **category B** for environmental assessment since the proposed investment is not expected to create significant environmental adverse impacts on local environment and local community (including ethnic minorities and vulnerable groups). The proposed construction/rehabilitation of facilities such as construction/rehabilitation of student classrooms, building for a business incubation center, laboratories, student training center, an agro-industry lab, and upgrading lab facilities would be carried out on existing HEIs campus. No full scale Environmental Impact Assessment (EIA) is required. But two safeguard instruments are triggered by the project are (i) environmental assessment OP/BP 4.01 and indigenous peoples OP/BP 4.10.

**Environmental Assessment (OP/BP4.01):** The project is not expected to have any major environmental impacts and is therefore classified as a Category "B" project. OP/BP 4.01 is triggered and only partial assessment is required. The MoEYS has prepared ESMF (and ECOPs), and equity plan for this project. When locations are identified and negative impacts are likely to be anticipated, specific instruments such as EMP and IPP would be developed. Considering the nature and small scale of construction activities, EMP and ECoPs will be incorporated in the bidding document to inform the contractors their role and responsibility to comply with the safeguard instruments.

**Indigenous People Policy (OP/BP4.10):** It requires that special planning measures be established to protect the interests of indigenous peoples with a social and cultural identity distinct from the dominant society that may make them vulnerable to being disadvantaged in the development process. A social assessment will be conducted, to inform the preparation of an indigenous people plan, which will be embedded in an equity plan for higher education. Also, during preparation, the borrower will conduct a process of free, prior and informed consultation in order to ascertain broad support among ethnic communities for the project. The process of social assessment and free, prior and informed consultation will include participatory discussions on the possible project impacts and culturally appropriate inclusion mechanism in a representative sample of ethnic communities in Cambodia. These discussions will be structured to ensure the voice of women and young people likely to benefit from the project are given priority.

**Gender and Development (OP/BP 4.20):** To address gender disparities and inequalities, the ESMF will provide guidelines for a gender responsive social assessment which will ensure that an inclusive, equity-focused and gender-responsive lens is used for assessing impacts of proposed sub-projects on different populations. Throughout the public engagement, different populations will be apprised of their right to free, prior and informed consultation to ensure a considered decision choice.

**Gender and Environmental and Social Health safety (ESHS):** HEIP is committed to address environmental, social, health and safety risks as well as to promote gender equality through the promotion of women participation in works (rehabilitation and maintenance). Where relevant, HEICIP will promote good ESHS practice through the use of relevant aspects of the revised World Bank standard bidding documents (as of Feb 2017).

## 5. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

Potential environmental and social impacts arising from the project were identified, at this stage, by comparing project activities and/or activities with the surrounding environment and social context during the site visit to the HEIs. GDH of MoEYS has carried out the environmental and equity assessment at the four selected HEIs during August-September 2017. These HEIs are (i) Royal University of Agriculture (RUA), (ii) University of Health and Science (UHS), (iii) Institute Technique du Cambodge (ITC), and (iv) Royal University of Phnom Penh (RUPP). As of end of August 2017, i.e., when this assessment has already been commenced, the project, during project preparation mission (September 05-14, 2017), added two new provinces in the scope (Svay Rieng and Battambang Province). However, the type and scale of investment is not known. Thus, the ESMF, that prepared for this project, is subject to further update when the task team obtains sufficient information during pre-appraisal mission schedule for October 2017.

From the field assessment, no major environmental and social impact are expected. Some minor and site specific issues may occur during construction such as dust, vibration, noise and debris, and disposal of construction waste. On the other hand, this project will benefit individuals who may belong to ethnic minority groups that triggers indigenous peoples OP/BP 4.10 and requires to prepare equity plan to ensure that disadvantage individuals, indigenous students would also benefit from the activities of the HEIP.

**Table 1 Summary of Operational Policies and Their Implication for the Project**

OP/BP	Summary of Safeguard and Other Operational Policies	Triggered (Y/N) and How	Implication
4.01	<p><b>Environmental Assessment:</b> covers impacts on natural environment (air, noise, dust, vibration, water and land, etc.), waste management, and human health and safety.</p> <p>Social impacts related to equal access to higher education for disadvantage and vulnerable groups,</p>	<p style="text-align: center;"><b>Y</b></p> <p>The project will finance construction activities, which may include the rehabilitation/construction of student classroom or buildings, construction of business incubation center, student training center, and agro-industry laboratory, as well as upgrading of existing laboratory facilities. Some of the likely environmental adverse impacts are possible to anticipate includes dust, noise and construction waste and management of laboratory waste (storage and disposal).</p> <p>Along with the civil works, the project will also have broader social impacts, particularly in relation to lowering the access threshold to higher education for women and disadvantaged group.</p>	<p>MoEYS has prepared ESMF (and ECOPs), and equity plan for this project. The scope of construction of facilities for each HEIs is unknown". However, It is expected that all proposed sites will be located within the campus or land owned by the HEIs. When locations are identified and negative impacts are likely to be anticipated, specific instruments such as ESMP would be developed.</p> <p>EMP will be incorporated in the bidding document to inform the contractors their role and responsibility to comply with the safeguard instruments.</p>
4.10	<p><b>Indigenous Peoples:</b> These are defined to be a distinct, vulnerable, social and cultural group possessing a number of characteristics including collective attachment to geographically distinct habitats or ancestral territories.</p>	<p style="text-align: center;"><b>Y</b></p> <p>The project is likely to benefit individuals who may belong to ethnic minority groups by facilitating their access to higher education, the World Bank's Policy on Indigenous People was triggered.</p>	<p>It requires that special planning measures be established to protect the interests of indigenous peoples with a social and cultural identity distinct from the dominant society that may make them vulnerable to being disadvantaged in the development process.</p> <p>A social assessment will be conducted, to inform the preparation of an indigenous people plan, which will be embedded in an equity plan for higher education.</p> <p>The process of social assessment and free, prior and informed consultation will include participatory discussions on the possible project impacts and culturally appropriate inclusion mechanism in a</p>

			representative sample of ethnic communities in Cambodia. These discussions will be structured to ensure the voice of women and young people likely to benefit from the project are given priority.
4.12	<b>Involuntary Resettlement:</b> This policy aims to address and mitigate risk of physical relocation, loss of land and other assets, sources of incomes and means of livelihood by local people due to proposed project.	<b>N</b>  The project will not trigger this involuntary resettlement policy as all civil works will be within HEIs existing campus and no affected person is identified at the project preparation stage.	No people will be affected by the project. However, if the location is determined and land or livelihood are affected, then resettlement action plan (RAP) has to be prepared.
4.20	<b>Gender and Development:</b> The objective of this policy is to assist the borrower country to reduce poverty and enhance economic growth, human wellbeing, and development effectiveness by addressing gender disparities and inequalities that hinder development, and by assisting the borrower country in formulating and implementing their gender and development goals.	<b>Y</b>  The gender inequality exists at the higher education and there is needs to improve participation, completion and quality of teaching-learning practices for female student and faculty members.	Gender is a critical cross cutting theme of the project. Equity assessment and equity plan shall pay more attention to gender dimensions to improve participation, completion, and quality of teaching-learning practices for female students and faculty members.  The Institutional improvement plan need to prepare and shall address the context specific gender disparities in target HEIs; and the construction of student dormitories will have separate male and female quarters. Gender strategy will be prepared during year 1 of project implementation; the strategy will be embedded in the social safeguards instruments.



## 5.1 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The investment under this project may involve rehabilitation /construction of student classroom/ buildings, construction of business incubation center, student training center, and agro-industry laboratory, as well as upgrading of existing laboratory facilities in the current HEIs' campus. The impacts are temporary and may affect the environment temporary in different ways. For example, environment concerns can stem initially from poor building design and planning, delayed of construction works, lack of construction camp maintenance, storage and handling of construction wastes and hazardous materials, and drainage and sewerage system. The impacts are straight forward and can be simply mitigated by applying good construction practices.

The lack of clear practical plans for environmental management will create opportunities for inappropriate disposal of solid waste and could lead to lack control of noise, vibrations and dust which can create a nuisance for individual/ teachers/students and communities. All these impacts can be mitigated through applying a good construction practice and closed supervision is critical during implementation. An ESMF including generic environmental management plan (EMP) and ECoPs have been prepared in such a way to address the impacts within local context. And when locations of sub-projects are known and adverse impacts are anticipated, site specific instruments such as EMP would be developed.

The ESMF suggests environmental and social checklist for screening the likely adverse impacts of sub-projects and includes relevant information on the management of environmental and social issues in the project. The generic EMP cover mitigation measures for impacts on construction and operations related activities, and the provisions for chance finds procedures for addressing physical cultural resources encountered during implementation. The ESMF and generic EMP contain contractor specifications to address environmental issues, including construction dust and noise control, construction waste management, site management, safety controls, provision of clean water and sanitation facilities, unexploded ordinance removal, and asbestos containing material demolition management.

## 5.2 SOCIAL IMPACTS

### 5.2.1 Equity Assessment and Equity Plan

The Bank's OP/BP 4.10 is triggered for this project as it is likely to benefit members from ethnic minority groups by facilitating their access to higher education. Thus, Equity Assessment has been carried out in order to comply with the requirements of the World Bank's Indigenous Peoples Policy to prepare a Social Assessment and Indigenous People's Plan based on a process of Free, Prior and Informed Consultation. This assessment included a review of the administrative data available on participation among these groups in STEM programs at the relevant institutions, representatives from HEIs, as well as focus group discussions with representatives of students from these groups at these institutions (four focus group discussions was held with total 77 poor students from provinces and remote areas of Cambodia including students who identified belonging to an ethnic minority group). The results of the assessment are:

1. **Demand for accommodation:** students face difficulty finding place for living when they first come to Phnom Penh for their higher education. Majority of them have never come to Phnom Penh before they start university. They could not have access to university

dormitory. Rental of an appropriate house is expensive and not affordable by most of students.

2. **Concern over living in the big city:** Students found it difficult to adapt to the busy traffic, that they are not familiar with locations and road directions, that they were scared travelling along the congested roads, and did not like living in a congested and noisy living environment.
3. **Lack of financial support:** It is very critical as all students are from families that are poor or just above the poverty line. Some students did not want their parents to financially support them, while some students said their parents are not willing to support their study financially. A group of students said their parents could not afford their study in Phnom Penh.
4. **Lack of foreign languages skill:** All participated students said they have no or little English comprehension. They hardly able to read, write, and listen while most of the course materials are in English or French despite the fact that instructors offer verbal instruction in Khmer. More seriously, almost all text books, reference books, research materials are available in English or other languages. Very few are available in Khmer.
5. **Lack of computer and IT related skill:** Like foreign language, students from provinces and remote areas have no or little computer and IT literacy. Majority of students have never used computer before they enter university. This is also a challenge for their research and assignment.
6. **Lack of support for disabled student:** There are also students with disabilities hoping to attain a university degree. There are complaints that the universities have insufficient facilities to support disabled students i.e. lift, ramp or visual equipment during teaching. Recently RUPP is constructing two lifts in order to support disabled students and senior instructors. Provision of facilities under the Project i.e. dormitory, library and laboratory will carefully be considered accessibility by all types of disabilities.
7. **Lack of modern and up-to-date laboratory and library:** Students also complained about the lack of modern laboratory and equipment for their experiment and library and research materials. Some universities have no Internet access or Internet access is very limited with slow speed and unstable.
8. **Lack of electricity supply:** Electricity is cut-off very often causing interruption during teaching and more seriously during the experiment work. Students requested that there should be a backup generator.

Based on these findings the equity plan (EP) has been prepared for the project that include key measures to address the equity issues. At the MoEYS level, General Department of Higher Education (GDHE) needs to put more effort to attract more student from remote area to apply for higher education. However, at university level some key measures shall be taken to address equity issues and to prevent student from dropout at higher education level.

### 5.2.2 Indigenous Peoples

The proposed project is not located in the province where indigenous people communities exist. However, this is because improving equity and access to STEM and agricultural subjects, for whom access can be improved are member of ethnic group in Cambodia, who are considered indigenous



people, based on the four criteria laid out in the World Bank's operational policy (OP/BP 4.10). Because the ethnic people are not the only marginalized group to benefit from these activities, it is therefore, an Equity Assessment and Equity Plan (EP) need to be carried out.

### 5.2.3 Involuntary Resettlement

The World Bank's policy on Involuntary Resettlement will not be triggered for this operation. Land acquisition, resettlement, or impacts on livelihoods are not expected to result from the civil works that will be financed from the project. An initial social screening of the proposed sites for civil works confirmed that they will be taking place on land owned by the HEIs, and are unencumbered by residential or livelihood activities.

### 5.2.4 Gender Considerations

As the higher education sub-sector is characterized by a degree of gender inequality for girls, each component activity will pay more attention to gender dimensions to improve participation, completion, and quality of teaching-learning practices for female students and faculty members: Institutional Improvement Plans will address the context-specific gender disparities in target HEIs; and the construction of student dormitories will have separate male and female quarters. Gender strategy will be prepared during year 1 of project implementation; the strategy will be embedded in the social safeguard instruments.

## 6. ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

The purpose of the ESMF is to manage potential adverse impacts by establishing a guidance document which will inform the RGC, MoEYS/related departments and local stakeholders to administer and implement mutually agreed sets of environmental and social safeguards procedures and measures. The ESMF will facilitate necessary environmental and social management (including risk assessment and management of environmental and social impacts) procedures and measures of targeted higher education institutions which may be financed by this project, and whose technical design and location is unknown and may change during project implementation. The ESMF comprises the guidance document required for the ESMP and other planning instruments (i.e., Equity Plan, or IPP) to be applied at project appraisal and formulation when detailed feasibility studies and technical design details become available. The ESMF is a guidance and decision-support tool for the MoEYS, stakeholders and different populations.

As an overarching guidance document, the ESMF should provide assurance that:

- The proposed projects shall consider potential environmental and social issues, especially for different populations who would be directly impacted or benefit (positively or adversely) by the project;
- The project considers socio-cultural, gender, and environmental values prevailing in areas where the proposed project would be implemented;
- Environmental and social safeguard instruments such as ESMP, EP, ECoP are suitably prepared and followed;
- ESMF provides assurance that safeguard instruments are compliant with the WBG environmental assessment (OP/BP 4.01) operational policies and procedures as well as national laws and regulations.
- ESMF provides guidance for Chance Finds Procedure and GRM, and

- Gender and Environmental, Social and health Safety (ESHS)

## 6.1 DESCRIPTION OF PROPOSED PROJECT

The Royal Government of Cambodia (RGC) has requested International Development Association (IDA) financing from the World Bank for the Higher Education Improvement Project (HEIP). The proposed project aims to enhance Cambodia's ability to meet the needs of the industries it serves as well as enhance competitiveness in the new Asian Economic Community (AEC), by increasing the relevance and quality of higher education provision in key target areas. To respond to this need, the proposed project will target two priority areas. During its project preparation mission from September 5<sup>th</sup> to September 14<sup>th</sup>, 2017 the Mission reconfirmed project main scopes as below.

**Project Development Objective:** is to improve the quality, relevance and equity of education and research at targeted higher education institutions, to improve governance in the sector, and to provide immediate and effective response in case of an eligible crisis or emergency.

Sub-components 1.1 and 1.2 involves the construction and rehabilitation of facilities within existing campus such as constructing and rehabilitating university buildings, classrooms, and student dormitories and financing research equipment and facilities/laboratories; research consumables; research operation costs; and researcher incentives.

## 6.2 SCREENING AND APPROVAL

Environmental and social screening is designed to identify and document potential impacts arising from proposed sub-projects. The environmental and social screening informs decision-makers about the need to implement measures or actions [if any] which avoid, minimize, mitigate or compensate for adverse impacts. Sub-projects are categorized according to the screening procedure. The procedure classifies projects into one of three environmental assessment categories (A, B, and C) depending on the type, location, sensitivity and scale of the project and the nature and magnitude of its potential environmental and social impact. The HEIP projects have been characterized as Category "B" for environment.

Once the location and type of investment is identified then, a site specific Environmental and Social Management Plan (ESMP) can be prepared as well as other safeguard measures if relevant and applicable. The technical team/project team under, led by a Program Officer, under the DHE of MoEYS, in collaboration with provincial departments, local communities and relevant stakeholders, is responsible for proposed sub-projects screening and ensuring that free; prior and informed consultation is carried out, and adequate environmental and social safeguards performance instruments are implemented. The technical team will prepare proposed sub-project(s) descriptions, conduct environmental and social screening of proposed sub-project(s), and assess requirements for necessary environmental and social management instruments (i.e., ESMP, Equity Plan/IPP and ECoP).

The DHE of MoEYS should conduct environmental and social due diligence for each proposed sub-project, including: (i) sub-project description; (ii) identification of sub-project area of influence; (iii) establish an environmental and social baseline as the benchmark for identifying and comparing potential impacts from proposed sub-project; (iv) assessment of environmental and social impacts and risks of a proposed sub-project during both construction and operation phases; (v) engaging stakeholders and different populations during public consultations, as necessary, and disclosure; and (vi) application of ECoP and/or identification of avoidance, minimizing, mitigation measures, and preparation of environmental and social management plans (i.e., ESMP, and IPDP) as necessary, including implementation arrangements, monitoring requirements, budgeting and grievance redress mechanism(s).

### 6.3 SCOPING ENVIRONMENTAL AND SOCIAL ISSUES

Under the HEICIP Project, proposed sub-projects in the four Higher Education Institutions would include the rehabilitation/construction of student classroom/buildings, construction of business incubation center, student training center, and agro-industry laboratory, as well as upgrading of existing laboratory facilities. However, at the project concept stage the location for these proposed civil works are not yet defined. So far, MoEYS consultants visited four higher institutions (RUPP, RUA, ITC and UHS). The main objectives of the visit were to: i) site screen the proposed civil works location, ii) inform concerned parties about the project and assess their commitment to the project to improve learning outcomes. The consultant team noted high level of enthusiasm from the sites visited and confirmed no potential adverse environmental and social impacts. Further assessment of types and nature of investment would be conducted during project appraisal stage. MoEYS Project Management Team (PMT) PT (Project Team or Technical Team) will be responsible for analyzing the level and extent of environmental and social issues relevant to the HEIP proposed civil works under sub-component 1.1. The analysis will determine whether:

- The civil works of proposed construction/rehabilitation under the sub-component 1.1 and 1.2 has the potential to cause any social or environmental impact, whether directly or indirectly;
- Any other Bank safeguards policies would be triggered by the nature of the HEIP proposed sub-project(s) initiatives and/or activities; and
- Could there be any activities under a proposed sub-project that could cause significant impacts, beyond what is acceptable under the WBG Category “B” Environmental Assessment classification.

As mentioned, the screening process will identify the nature of potential impacts, both positive and adverse, that the potential sub-project could generate within its region of influence (ROI). This will inform the selection of safeguards instruments that would be required to assess the potential impacts in further detail. The choice of safeguards instrument or measure primarily depends on the degree of significance of anticipated environmental and social impacts as well as the associated environmental and social risks.

Scoping confirms the key environmental and social issues, risks and potential impacts identified during the screening process. The scoping stage can highlight potential issues at an early phase of sub-project development so as to allow planners to design changes which will mitigate potential environmental and social impacts as well as, possibly, the project location to be modified.

The significance rating of potential impacts scoped will determine the level of the environmental and social safeguards instruments needed in order to undertake further assessment as well as to propose adequate mitigation measures to comply with its Category “B” environmental assessment (OP 4.01) classification. Environmental and social safeguards instruments may include ESMP, Equity Plan and ECoP.

### 6.4 APPLICATION OF SAFEGUARDS PLANS AND MEASURES

The proposed sub-projects will require several safeguards instruments to be applied at project appraisal and formulation. Some safeguards instruments will range from abbreviated, checklist type of ESMPs for rudimentary repair works while others will require more comprehensive ESMPs, Equity Plan within clearly delineated sub-project footprints. All sub-projects activities involving some form or another of civil engineering works will require environmental and social management safeguards instruments.

### 6.4.1 Lessons Learned

MoEYS has been implementing a number of Bank financed-education projects, where capacity in project preparation and safeguards implementation has been improved overtime. This cannot be separated from on-going capacity development (including on-the-job-training) provided by the Bank's safeguards team. However, there are still gaps that need to be improved, and can be drawn upon as below:

**Site safety:** budget for site preparation and site safety requirements (fence, sign board, etc.) is included in the civil works of SESSP (Second Education Sector Support Project), and will be considered to do so for HEICIP. And it is important that the project will comply with the Environmental, Health, and Safety guideline of the IFC.

**Waste Management:** Construction waste often left over at construction site after completion of the civil works. Normally, the EMP addressed this matter, and will implement through serious monitoring to be conducted by safeguard focal persons of MoEYS. This ESMF provides measures to mitigate impacts as well as site cleaning and management. Contractor must ensure that EMP is implemented, where site supervisor/Department of Construction (DoC) will conduct close monitoring.

**Dust Control:** Dust is the temporary disturbance during construction/rehabilitation period. However, if not well managed, it will be a big nuisance during course hours or experiment in the laboratory. It is suggested that under HEIP activities that generate dust shall be avoid during course hours or laboratory time.

**Wastewater Discharge:** Possible discharge of wastewater from HEI education facilities including laboratory and research center of the visited four HEIs to the the existing drainage/sewerage system. According to the sub-decree of the Ministry of Environment (MoE), Article 10 of the sub-decree on Water Pollution Control, April 1999 states that "The discharge or transport of wastewater from any sources of pollution to other places for any purpose is subject to prior permit from the Ministry of Environment (MoE). The application for this permit shall be copied to the concerned ministries or agencies. (Annex 3: type of pollution sources required having a permission from MoE before discharging or transporting their wastewater: Laboratory and research center). It is however confirmed that no major harmful substances will be used in the laboratories of the four HEIS. Where relevant, MoEYS shall discuss with MoE with regards to the construction/extension of laboratory or research center for necessary measures to be prepared.

**Monitoring and reporting:** HEICIP will ensure that the safeguards focal persons of MoEYS will conduct regular monitoring in collaboration with relevant stakeholders including HEIs and contractor and incorporating the results into the progress report and also copy to each institutions. Bank's safeguard team continue to provide support to the monitoring and reporting.

**Capacity building:** Seeing the need, Bank provided capacity building on Bank's policies and needed instruments (ESMF and EMP), monitoring and reporting to HEIs/MoEYS staff and engineer prior to the commencement of HEIP. Under HEIP, capacity development will continue to be carried including on-the-job-training on safeguards screening, monitoring, and reporting.

### 6.4.2 Environmental and Social Management Plan

The HEICIP proposed construction under sub-component 1.1 will require an ESMP once locations are determined. The ESMP would become part of the civil engineering and physical works contract (see Annex 4: Generic Environmental Management Plan [EMP]), establish the environmental and social

standard and compliance mechanisms, and serve as the contractual basis for supervision and enforcement of good environmental and social practice during subsequent sub-project civil engineering and physical works.

The environmental analysis, design and preparation of an ESMP for each target school must be conducted in close connection with the feasibility and engineering design of the sub-project and/or each individual building. As the proposed construction of HEIs facilities will involve rural access to education, the analysis should concentrate on environmental and social issues associated with direct impacts of the students from vulnerable groups and indigenous communities.

The proposed sub-project will be subjected to an environmental and social screening. The environmental and social screening will include, but not be limited to, the analysis of available information concerning the general population distribution, concentrations of students from indigenous communities, concentrations of low-income/disadvantage communities, sensitive and/or critical natural habitats, major rivers and waterways, recorded cultural heritage sites, and any other potentially sensitive areas, based on recent census, official data and information garnered from civil society organizations as well as detailed site visits.

#### **6.4.3 Indigenous Peoples and Equity Plan**

Students in the HEIs are from various groups of society: indigenous communities, disadvantage/vulnerable group, poor family. Disabled students will face difficulty for attending the HEIs and they need help from other students. And these groups of people will benefit from this project.

The HEICIP will trigger the Indigenous Peoples OP/BP 4.10 and it needs to ensure that:

- Ethnic minority students are afforded meaningful opportunities to participate in planning that affects them;
- Opportunities to equitable access to education with appropriate support from HEIs; and
- Any sub-project impacts that adversely affect them are avoided or otherwise minimized and mitigated.

Because the project is involved these groups of people, the equity assessment and equity plan has been prepared. The objective is to conduct a rapid assessment of the barriers faced by women, people from remote areas, and members of ethnic and other disadvantaged groups in participating in STEM and Agriculture subjects, and to design a plan to help students from these backgrounds to overcome these barriers. The Equity Assessment and Plan was also prepared to ensure the disadvantage individuals, other indigenous students would also benefit from the activities of HEIP. This assessment should be based on a process of Free, Prior and Informed Consultation.

#### **6.4.4 Resettlement Action Plan**

At this stage there is no displacement of people since the proposed construction are within the HEIs campus. Therefore, Involuntary Resettlement OP/BP 4.12 is not triggered and resettlement action plan (RAP) is not required for the HEICIP.

#### **6.4.5 Environmental Code of Practice**

The Environmental Code of Practice (ECoPs) is updated from previous project of MoEYS (HEQCIP) for this project. It is trusted to be simpler and practical for safeguarding the construction of facilities (see

Annex 5). The Contractor shall be aware of the ECoPs and implement it as part of their professional practice. While HEIs committee, site engineers, and other relevant stakeholders will need to check construction site before starting civil works and appropriately advise to the contractor if there is any wrong doing. It is the contractor's responsibility to implement ECoPs and the ESMP provisions. However, all activities should not harm to people and environment.

ECoPs users will comprise: project planners, designers, managers, construction engineers, consultants of the Executive Agency, private consulting firms and contractors, academic and research institutions, government ministries and institutions, and stakeholders.

#### 6.4.6 Chance Find Procedures

The proposed sub-projects are not expected to yield archaeological, paleontological or cultural findings of any significance because HEICIP proposed construction will occur in the existing HEIs campus. However, there remains a possibility for (as yet undiscovered) sites of local cultural significance (i.e., sacred sites, cemeteries) and archaeological sites to exist with sub-project areas.

Chance find procedures will be used as follows: (i) stop construction activities in the area of the chance find; (ii) delineate the discovered site or area; (iii) secure the site to prevent any damage or loss of removable objects; (iv) notify the supervisory Engineer who, in turn, will notify the responsible local authorities; (v) responsible local authorities would conduct a preliminary evaluation of the findings to be performed by archaeologists who will assess the significance and importance of the findings according to various criteria, including aesthetic, historic, scientific or research, social and economic values; (vi) decisions on how to handle the finding shall be taken by the responsible authorities which could result in changes in layout, conservation, preservation, restoration and salvage; (vii) implementation for the management of the finding communicated in writing; and (viii) construction work could resume only after permission is given from the responsible local authority concerning safeguard of the heritage. The aforementioned procedures need to be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer will monitor the above procedures relating to the treatment of any chance find encountered.

In general, the process of project implementation includes:

- Initial Project screening which will be conducted by PMC of MoEYS. It is to find out whether the project has potential impacts on social, environmental, and indigenous people at a certain level. Local people and different populations are encouraged to participate through free, prior and informed consultation (FPIC);
- If the project has no adverse impacts, the full project feasibility will be conducted. However, if the project has adverse impacts, a team of social and environmental safeguards specialists will conduct detailed impact assessment and provide recommendations to the project design team to avoid the impacts; and
- The safeguards team will monitor the process of design, implementation, and post project implementation.

## 7. INSTITUTIONAL AND IMPLEMENTATION ARRANGEMENTS

The project will be implemented at the national and institutional levels over a period of five years from the date of effectiveness. MoEYS will assume overall responsibility for coordination and implementation



of the project, including procurement, disbursement and financial management (FM) and in close collaboration with target HEIs. The implementation arrangements will be based on the existing MoEYS structure with clear responsibilities.

At the highest level, the project management arrangements will require strong support from MoEYS leadership. Under the current arrangement for ongoing projects, the Minister has established a Project Management Committee (PMC) responsible for the oversight of the ESP. The PMC is led by Minister of Education and the Secretaries of State responsible for all sectors in the ministry. This management structure has been designed to ensure that overall educational policy direction is analyzed from a variety of angles; and that policy decisions are followed into implementation through the overall coordination of the Directors General. Since the PMC also has the mandate to provide oversight responsibility for all donor-financed projects, and given the existing structure, the PMC will be responsible for: (a) approving the project's annual activities, operational plan, and budget allocations; and (b) overseeing progress and compliance with agreed project guidelines. Project Director of HEIP would be the member secretary of the PMC for providing adequate information for decision making.

At the project coordination level, the Project Management Team (PMT) will be chaired by the Secretary of State (or the Under Secretary of State) responsible for the Directorate General of HE. He will be the Project Director, with overall responsibility for project direction and management and act as key point of liaison with IDA. The Director General of Higher Education will be the Project Manager. The PMT will include senior representatives from targeted HEIs, ACC, and DGHE. It will be responsible for: (a) monitor the overall project implementation and its adherence to the project objectives; (b) day to day implementation oversight and liaise with Project Teams at each targeted HEI on all operational matters; (c) monitoring financial management and procurement, (d) commissioning and approving required accounts and reports; (e) ensuring project audit requirements are satisfied; (f) approving quarterly progress reports, and procurement plans; (g) conducting quarterly progress monitoring of project targets; (h) overseeing M&E of the project (i) reviewing the annual operation plan with recommendations of approval or disapproval to the Project Director; (j) providing oversight for civil works programs, (k) ensuring compliance with safeguards policy.

Management structure. MoEYS/PMC will ensure close coordination and collaboration among project implementers and relevant RGC agencies (including the Ministry of Economy and Finance (MEF), MAFF, and MoH) and other people and entities involved with the project and will report the overall project progress to IDA and related RGC agencies.

Reporting arrangements and supervision. The PTs at HEIs will report to their line ministries, MoEYS, MEF, MAFF, and MoH, for overall monitoring and PMT for information, which in turn will report to the MoEYS. To ensure that the project is implemented with the full participation of and close coordination between the PMT and PTs and between line ministries and PTs at HEIs, regular field visits and workshops will be conducted by the PMT/PT managers, staff, and consultants throughout the year. IDA will conduct its formal supervision mission at least every six months with more frequent on the ground support from the field based project team. The project midterm review will be conducted about two and a half years following the start of project implementation.

Each Institute will also appoint Environment and Equity focal persons, who will be responsible for monitoring the implementation of the actions laid out in the ESMP and reporting on their implementation – ideally a senior member of Faculty or the University Administration.

## 8. CONSULTATION AND INFORMATION DISCLOSURE

The Project supports a participatory and consultative approach involving meaningful engagement with different populations (i.e., students from ethnic minorities and vulnerable groups – women and female/male youth and children, men, the elderly and disabled, etc.). The approach was intended to enhance general understanding of different populations through public access to information for the ESMF and safeguard management instruments (i.e., ESMP, ECoPs, EP as necessary), roles and responsibilities, and perceptions as a basis for improving coordination and achievement of the HEICIP objectives. The participatory and consultative approach should ensure effective communication and coordination with all stakeholders and different populations at national and local levels.

Participation is an active and continuous process of interaction among the key stakeholders, including the communities directly affected (whether positively or adversely), national agencies and line ministries, the project consultants, civil society and international donor agencies. Participation as a generic term usually encompasses two distinct dimensions: information exchange (i.e., dissemination and consultation) and varying forms of joint decision-making (i.e., collaboration or participation).

In compliance with the World Bank guideline and RGC ESIA sub-decree, once the final ESMF and EP are accepted by the World Bank, the documents must be made available for public and will be disclosed (in both English and Khmer languages) on the MoEYS website, and at locality. The documents will be disclosed in the World Bank InfoShop.

## 9. GRIEVANCE REDRESS MECHANISM

Communities and individuals who believe that they are adversely affected by the project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS).

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

**Project Level Grievance Redress:** During implementation, in the event that there are issues related to environment issues affecting local people or community or issues related to disadvantaged students who believe they do not have equitable access to the activities of the project, they can provide complaint or feedback to the Environment and Equity focal person at each institution. The focal persons should seek to resolve the issue raised within 1 week. If they do not feel that they can resolve it in that time frame, they should convene a meeting with a representative of faculty, the Institute administration, and a representative of the student body agreeable to the affected student. If this procedure does not resolve the complaint to the satisfaction of the student, it should be raised to the PMT. The environment and equity focal person should keep a written record of all feedback received and how it was responded to.

## 10. MONITORING AND REPORTING

Monitoring is a key component of the ESMF during the HEICIP Project implementation. Quarterly, and semi-annual reporting will be undertaken as per specific activities in order to:

- Improve environmental and social management practices;



- Ensure the efficiency and quality of the environmental and social assessment processes;
- Establish evidence- and results-based environmental and social assessment for the project; and
- Provide an opportunity to report the results of safeguards, impacts, and proposed mitigation measures' implementation.

In regard to proposed sub-project initiatives and/or activities' implementation under sub-component 1.1, the MoEYS PMT PT will conduct internal monitoring activities during the design and feasibility studies and ESMPs to determine the extent to which mitigation measures are successfully implemented. Monitoring will focus on three key areas, including:

### **Compliance Monitoring**

Compliance monitoring is to verify that the required mitigation measures are considered and implemented. During the sub-project preparation phase, compliance monitoring activities will focus on ensuring effective ESMF implementation and respect of procedures. The MoEYS PMT PT Environmental and Equity focal person will ensure that sub-project studies are properly and expeditiously conducted in compliance with RGC laws and regulations and the WBG policies.

During the implementation phase, compliance monitoring would include inspections during construction of the sub-project initiatives and/or activities to verify the extent with which conditions and licenses are issued and adhered.

### **Impacts Monitoring**

Once the project is under implementation, monitoring of sub-project initiatives and/or activities' impact mitigation measures should be the duty of the PMT. It is expected that the environmental and social safeguards documents will be given to the contractor and the department of implementation agency (DIA) will monitor to ensure that works are preceding in accordance with the agreed (between RGC and WBG) mitigation measures. Monitoring and evaluation of the social impacts will measure the following:

- Gender differentiated impacts to be avoided, minimized or addressed;
- Post project Socio-economic status of communities affected by the project; and
- Management of complaints, disputes or conflicts.

In order to measure these impacts, the pre-feasibility studies will identify:

- Specific indicators to be monitored with gender disaggregated data;
- Define how indicators will be measured on a regular basis; and
- Identify key monitoring milestones.

### **Cumulative Impacts Monitoring**

Impacts of the sub-project initiatives and/or activities on the environmental and social resources for the proposed building construction/rehabilitation will also be monitored in consideration of other developments which might be established in the area.

## **11. ESMF IMPLEMENTATION**

### **11.1 CAPACITY BUILDING AND TRAINING PLAN**

Environmental and social sustainability of the proposed sub-projects to be formulated is largely dependent upon the capacity of the implementing agencies to coordinate the planning and supervision of service providers. MoEYS has wide experience implementing projects funded by various donors (i.e. ADB, WBG, EU, and JICA). Each donor and financier has its own guidelines and regulations. The MoEYS has strong familiarity with WBG's policies and procedures including guidelines on procurement, project implementation, environmental and social safeguards, and other related procedure and instruction manuals. MoEYS also has formulated a code of conduct for the project implementation staffs.

The implementation of Bank supported-education projects have contributed to increasing environmental safeguards capacity to sub-project component staff. For sustainability of safeguards management, the Bank will continue to support the safeguards capacity development within GDH of MoEYS, including young staff.

MoEYS understands the importance of environmental protection and avoiding, minimizing, mitigating or compensating for adverse social impacts particularly as a precondition for obtaining WBG financing. In order to ensure effective implementation of safeguards at planning, pre-construction, construction and operations phases, it is imperative to have capable and properly trained staff in place. Accordingly, an institutional strengthening and capacity building training program will include on-the-job training, workshops, field visits and external training opportunities.

MoEYS PMT has their PT to be responsible for leading the preparation of safeguards instruments, monitoring, and ensuring compliance. During the implementation, MoEYS will ensure overall monitoring of the EMP (ECOPs), and EP. EMP (ECOPs) will be carried out and EMP will be incorporated in the bidding documents to inform the contractor/ and MoEYS PMT PT about their role and responsibility in complying with agreed safeguard instruments.

At each HEIs the appointed Environment and Equity focal persons will also help on daily monitoring the implementation of the actions laid out in the ESMP and reporting on their implementation – ideally a senior member of Faculty or the University Administration.

**Table 2 Key responsibilities for ESMF implementation.**

Sub-project Cycle	MoEYS Responsibility	PMT PT
Screening	<ul style="list-style-type: none"> <li>▪ Advise applicants and other stakeholders of environmental and social safeguard procedures.</li> <li>▪ Review the concept note/idea and screen for potential safeguard issues, and advise applicants regarding the nature and content of safeguard documents, measures and actions to be prepared.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Assess any potential safeguard issues early in the preparation process, including screening for the presence of indigenous peoples.</li> <li>▪ Describe potential safeguard issues in the safeguard screening form to be attached to the sub-project proposal.</li> </ul>
Preparation	<ul style="list-style-type: none"> <li>▪ Advise applicants on safeguard issues, as needed.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Undertake safeguard preparation actions as required, such as consultations with local communities and/or collection of data.</li> <li>▪ Design safeguard measures and prepare documents, such as an ESMP, EP, ECoP, etc. as agreed with MoEYS. If applicable, disclose draft safeguard documents with the sub-project proposal to affected communities prior to final review of proposal by the MoEYS.</li> </ul>
Review and approval	<ul style="list-style-type: none"> <li>▪ Review sub-project proposal for safeguard impacts and social risks.</li> <li>▪ Assess the adequacy and feasibility of the safeguard assessment and consultation process. If needed, request further steps.</li> <li>▪ Assess the adequacy and feasibility of the safeguard measures and documents. If needed, request appropriate changes to these and reassess prior to final approval.</li> <li>▪ If Indigenous Peoples (OP/BP4.10) are involved, ascertain that they have provided free, prior and informed consent to sub-project activities affecting them.</li> <li>▪ If applicable, publicly disclose safeguard related information on the website after sub-project approval</li> </ul>	<ul style="list-style-type: none"> <li>▪ Submit sub-project proposal with safeguard measures and documents as agreed. If requested by MoEYS take additional steps to meet ESMF and safeguard policy provisions. Re-submit proposal with revised safeguard measures and documents, as needed. All national and local legislation and regulations will be complied with.</li> </ul>
Implementation	<ul style="list-style-type: none"> <li>▪ Supervise and review safeguard documents and issues during sub-project implementation. If needed, request changes to safeguard measures.</li> <li>▪ Review and approve Plan of Actions that are required to be prepared during implementation of sub-projects.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Disclose final safeguard documents, if any, to affected communities.</li> <li>▪ Monitor and document the implementation of safeguard measures.</li> <li>▪ When Indigenous Peoples (OP/BP4.10) are involved, include them in participatory monitoring and evaluation exercises.</li> </ul>
Evaluation	<ul style="list-style-type: none"> <li>▪ Ensure inclusion and review of environmental and social safeguard issues and outcomes in mid-term and final sub-project evaluation and reporting, including concerning any lessons learned on the sustainability of each sub-project.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Evaluate the implementation and outcomes of safeguard measures.</li> <li>▪ When Indigenous Peoples (OP/BP4.10) are involved, include them in participatory evaluation exercises.</li> </ul>

## 11.2 INDICATIVE BUDGET FOR ESMF IMPLEMENTATION

ESMF implementation cost will be limited to monitoring activities aimed at ensuring that the sub-projects activities of HEICIP align with the WB operational policies in this document. For sustainability of safeguards management, the Bank will continue to support the safeguards capacity development within GDH of MoEYS, including young staff and key stakeholders. The total indicative cost is estimated and presented in below table.

**Table 3 ESMF Implementation Costs**

No	Activity	Description	Unit	Quantity	Unit Cost	Amount (USD)
<b>A Supervision, Monitoring, Training on ESMF</b>						
1		PT and safeguards focal persons to provide training and quarterly monitoring including preparation of annual safeguards monitoring report for 3 years	Year	3	28,800.00	86,400.00
2		Focus group consultation with students from disadvantage and vulnerable group including students from ethnic minority groups at preparation of ESMP (6 times)	time	6	1,700.00	10,200.00
<b>B Research and Specific Training on Environmental and Social Issues</b>						
1		PT and safeguards focal persons to provide workshop on related Cambodia laws and regulations for only 1 time	time	1	6,000.00	6,000.00
2		Refreshing workshop on Bank's Operational Policies to PT and safeguards focal persons (1 time)	time	1	6,000.00	6,000.00
3		Recruitment of national consultant(s) (partime) to assist MoEYS PMT PT to prepare ESMP, EMP for specific site	days	50	300.00	15,000.00
<b>TOTAL</b>						<b>123,600.00</b>

- Annex 1: Field Rapid Environmental Assessment
- Annex 2: Equity Assessment
- Annex 3: Environmental Screening Checklist
- Annex 4: Generic EMP
- Annex 5: Environmental Code of Practice