

State of Palestine Ministry of Education

PHASE 1 OF THE MULTI-PHASE PROGRAMMATIC APPROACH

SUPPORTING AN EDUCATION REFORM AGENDA FOR IMPROVED TEACHING, ASSESSMENT AND CAREER PATHWAYS (SERATAC)

Project No: (P177299)

Social Impact Assessment

(SIA)

June 28th, 2022

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Acronyms and Abbreviations

D.G. Directorate General/ Director General
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- ESF Environmental and Social Framework
- ESP Environmental and Social Policy
- ESS Environmental and Social Standard
- GBV Gender Based Violence
- GM Grievance Mechanism
- LMP Labor Management Procedures
- MOE Ministry of Education
- PAD Project Appraisal Document
- PCU Project Coordination Unit
- PWD People with Disabilities
- SEA Sexual Exploitation and Abuse
- SEP Stakeholders Engagement Plan
- SERATAC SUPPORTING AN EDUCATION REFORM AGENDA FOR IMPROVED TEACHING, ASSESSMENT AND CAREER PATHWAYS
- SH Sexual Harassment
- SIA Social Impact Assessment
- SMP Social Management Plan
- STEM Science Technology Engineering and Mathematics
- TBD To be determined
- WB&G West Bank and Gaza

Executive Summary

The West Bank & Gaza Supporting an Education Reform Agenda for Improved Teaching, Assessment and Career Pathways Project (SERATAC) includes three phases focused on three thematic areas that address the most pressing education challenges in West Bank and Gaza (WB&G).

The Project will be implemented by the Ministry of Education (MOE) in West Bank and Gaza and in accordance with the provisions of the relevant Environmental and Social Standards (ESSs) of the World Bank's Environmental and Social Framework (ESF). In order to assess and manage social risks and impacts identified under ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), MOE is preparing this Social Impact Assessment (SIA) for the Project.

The methodology used for conducting this assessment includes: desk review of project documents (PAD, SEP, ESCP), online interviews, and interviews and data collected from the MOE and the Palestinian Central Bureau of Statistics (PCBS).

Face-to-Face Meetings were conducted with different DGs at MOE. A total of 7 online discussion sessions were conducted with representatives from the directorates of the MOE and schoolteachers from the West Bank and Gaza to include all 18 directorates in the West Bank and 7 in the Gaza strip.

The assessment verified that the main social risks pertain to exclusion (of select vulnerable groups including persons with disabilities (PWD), people living in remote and access restricted areas); sexual exploitation and abuse, sexual harassment, and gender-based violence (SEA/SH/GBV); online data security issues; and community health and safety concerns. Issues of exclusion and most vulnerable categories in this regard were identified on the basis of data provided by the MOE and verified through online interviews with the target community. The assessment highlights that it is crucial for the project to address the learning issues/challenges for PWDs in order to ensure that PWDs are not excluded from project benefits.

A mitigation plan, including recommended mitigation measures for each risk, is presented at the end of this assessment. It is proposed that mitigation measures will be considered and included in the design of relevant project interventions (e.g. ToRs, capacity building and technical support activities, strategies, policies etc.) and the cost of implementing these measures will be included in the cost of the said interventions.

Introduction and Background

SERATAC includes three phases focused on three thematic areas that address the most pressing education challenges in WB&G. Phase 1 will, on the one hand, respond to medium-term needs resulting from missed learning due to the COVID-19 pandemic and the Gaza conflict, and on the other, lay the foundations for long term reform of the system. Each phase will gradually and progressively contribute towards the program development objective. There will be a logical scale up of initiatives from primary level (in phase 1) to lower secondary (phase 2) to upper secondary (phase 3). All three phases will be fully anchored in student learning data: phase 1 will establish the first internationally recognized measurement of student learning in over a decade, with PISA 2022 and TIMSS 2023, while subsequent international assessments in phases 2 and 3 will enable the establishment of learning trends. Similarly, phase 1 will see student career guidance improved, while the following phases will increase secondary students' pathways to tertiary education and the labor market.

The Phase 1 project includes the following components:

Component 1: Building strong foundational skills for learning and wellbeing. SERATAC will finance WB&G's efforts to raise foundational skills and wellbeing of Palestinian primary school students, providing each child with a strong foundation for their future learning. In Phase 1, this will be achieved through (i) the development of an Arabic literacy

strategy to set quantifiable goals for children's Arabic language learning outcomes along with the roles of key actors; (ii) improvements to early grade Arabic language arts instruction (reading, writing, speaking, and listening in Grades 1–4); (iii) strengthening of preservice teacher education in classroom practices to improve foundational skills; and (iv) promotion of positive school and classroom climates, including extracurricular activities, so they are conducive to student learning and wellbeing. Through the learning associated with implementing the Phase 1 activities, scaling up would take place in Phases 2 and 3 to reach higher levels and grades for Arabic language arts and positive school and classroom climates, to expand to mathematics and science in the early grades, and to support efforts to sustain and embed improvements in these areas through strengthening of key system mechanisms such as teacher policies, school evaluation, and school improvement planning.

Component 2: Harnessing technology to improve STEM learning and better equip students for the labor market. Through this program component, SERATAC will improve Science Technology Engineering and Mathematics (STEM) teaching and learning and better equip students to make informed career choices and find jobs. To achieve this objective, under Phase 1, the program component will aim to (i) strengthen and operationalize MOE's STEM Framework, (ii) improve upper primary (Grades 5 and 6) students' mathematics, science and digital skills through improved pre-service and in-service teacher training as well as an adaptive learning program, and (iii) lay the foundations for an effective career guidance system that helps secondary students make informed career choices and be better equipped to pursue them. Phases 2 and 3 will build on the technical and implementation knowledge gained in the first phase and will focus on scaling up the package of STEM interventions gradually to lower secondary (Grades 7 to 9), and then to upper secondary (Grades 10-12), phase in the adaptive learning program in mathematics to benefit Grade 9 and Grade 11 students, and then expand the scope and reach of the career guidance system to include tertiary education students.

Component 3: Strengthening the student learning assessment system. Through the third program component, SERATAC will strengthen the Palestinian student assessment system so that it promotes and incentivizes learning at all grade levels. To achieve this objective, under Phase 1, the component will: (i) strengthen the national assessment framework and Arabic national assessment in Grade 5; (ii) lay the foundations to reform the secondary school leaving examination (Tawjihi) and create a more inclusive pathway to the labor market for secondary school students; and (iii) finance participation of WB&G in two ILSAs to obtain high-quality learning data. In phases 2 and 3, the lessons learned during phase 1 will be applied to support the gradual rollout of Tawjihi reform measures, including the creation of inclusive and more flexible pathways for secondary students to enter into technical vocational colleges and higher education. These phases will also ensure the continued availability and effective use of high-quality data from national and international assessments. This approach will enable the construction of comparable trends in Palestinian student learning outcomes over time, that continuously inform policymaking and provide a powerful tool to hold education stakeholders accountable for student learning.

The Project will be implemented by the MOE in West Bank and Gaza and in accordance with the provisions of the relevant ESSs of the World Bank's ESF. In order to assess and manage social risks and impacts identified under ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), MOE is preparing this SIA.

Identified Risks in the project target areas:

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The program is expected to have overall positive social impacts. The program does not involve any civil works or land acquisition and resettlement. The overall social risk is assessed as moderate. Key social issues and risks of the project are related to exclusion of certain beneficiary groups, data privacy breach in the use of digital technologies, SEA/SH and GBV, and health and safety of communities due to potential exposure to COVID-19 for example during face-to-face trainings. Preliminary description of these issues/risks is as follows:

i. Exclusion - The primary social risk across all components is of exclusion and inequitable access to program benefits. There is a potential risk that schools and staff (teachers, principals, supervisors, counselors), and consequently

students and parents/families, in underserved and marginalized areas in the West Bank and more specifically in Gaza, due to the political situation, (e.g. rural and remote locations, access restricted areas (ARAs etc.)) might not benefit equitably from the interventions supported under the program (e.g. provision of books, trainings, piloting of score card, use of digital technology for learning, provision of digital skills etc.). Similarly, there is a risk that requirements of children with disabilities, learning and physical, and concerns and needs of underserved and marginalized groups (e.g. children living in single-parents' households, the poor, people in remote locations etc.) might be overlooked in the development of learning strategies, stakeholder engagement and information dissemination mechanisms included in the program design.

ii. SEA/SH/GBV – The program will also be implemented in rural/remote locations where the risk of SEA/SH is potentially higher and there is reduced access to GBV support service providers. In the PMA Phase 1, there is a risk of SEA/SH during face-to-face trainings. Furthermore, while the use of digital technology for learning is an extremely important intervention, particularly during the Covid-19 pandemic, there is some risk of sexual harassment (SH) and sexual abuse and exploitation (SEA) in the digital space. At project appraisal stage, based on preliminary design information, the SEA/SH/GBV risk was rated as moderate. However, this risk needs to be properly assessed and requisite mitigation measures (e.g. implementation of Code of Conduct (CoC) for workers; special features in the project GMs (for beneficiaries and workers) to address potential cases of SEA/SH/GBV and provision of requisite training to personnel in this regard etc.) need to be proposed and included in the design of activities, E&S instruments etc., as required, and implemented.

iii. Data privacy issues— The program will make use of digital technologies for trainings and learning and there is a potential risk of data privacy breach in the use of such technologies. This risk is evaluated in this assessment so that requisite mitigation measures can be included in the design of relevant activities and E&S instruments.

iv. Community Health and Safety - There is a potential health risk of community exposure to COVID-19 during faceto-face training activities. In addition, there is a risk of SEA/SH both during face-to-face trainings and activities and in the digital space. The supply and installation of equipment to enhance digital infrastructure may also entail health risks related to exposure to COVID-19. Measures and guidelines to minimize community health and safety risks related to exposure to COVID-19, and other risks will be included in the ESHS section or the specifications of the supplies bidding documents.

Some additional risks pertain to health and safety of workers and labor and working conditions. These risks were assessed, and requisite mitigation measures provided in the Labor Management Procedures (LMP) prepared for the project.

The project Stakeholder Engagement Plan (SEP) identifies the various categories of project stakeholders, including vulnerable groups. The SEP also provides details of the project Grievance Mechanism (GM) which also includes measures to address any SEA/SH/GBV related complaints, including survivors' referral mechanisms.

Institutional Framework

The MOE will have the primary responsibility for overseeing the overall implementation of SERATAC. The PCU currently managing the Bank's education projects will be entrusted with managing program activities. Specifically, the PCU will be responsible for coordinating implementation, ensuring compliance with fiduciary and environmental and social (ES) Bank requirements, ensuring the overall technical coherence of program activities across the MOE's departments, and liaising with respective district offices and municipalities. Since MOE is in charge of monitoring and supervising education in Palestine and due to the fact that there are remote areas and congestion in the schools, the Ministry has established a directorate office for localities in each governorate. There is a total of 17 governorates, 11 in the West Bank and 6 in Gaza strip. Table 1 below shows the distribution of the governorates.

A total of 24 directorates was established by MOE, including 18 in the West Bank and 6 in the Gaza strip (which is more than the actual number of governorates), as this is established based on certain criteria depending on number of teachers and commute to remote areas. Through its directorates' offices, the MOE implements all its national, curricular, and school monitoring in Palestine. MOE is in charge of primary and secondary education supervision in the West Bank and Gaza for all public and private schools leading up to the Secondary High School Diploma (Tawjihi).

There are 3107 schools in West Bank and Gaza of which 2,343 schools are in the West Bank and 764 schools are in the Gaza strip. Public schools constitute about 73% in total (1,863 in the West Bank and 422 in Gaza). (Annual Statistic for Education Book,2020-2021). Table 1 below shows Directorates of the MOE in West Bank and Gaza.

Jerusale Hebror	Jerusalem Suburbs Hebron North Hebron
	Jerusalem Suburbs Hebron North Hebron
Hebror	North Hebron
Hebror	ו
	Yatta
Ramallah and	Ramallah and Al-Bireh
	Birzeit
West Bank Nablus	Nablus
	South Nablus
Jericho) Jericho
Bethlehe	em Bethlehem
Salfit	Salfit
Tulkare	m Tulkarem
Qalqily	a Qalqilya
Jenin	Jenin
	Qabatya
Tubas	Tubas
	Gaza North
	Gaza West
Gaza	Gaza Middle Area
	Gaza East
	Khan Younis

Table 1: Governorates and Directorates of MOE in the WB&G

East Khan Younis
Rafah



Figure 1 Governorates distribution in West Bank (https://ontheworldmap.com/palestine/west-bank)

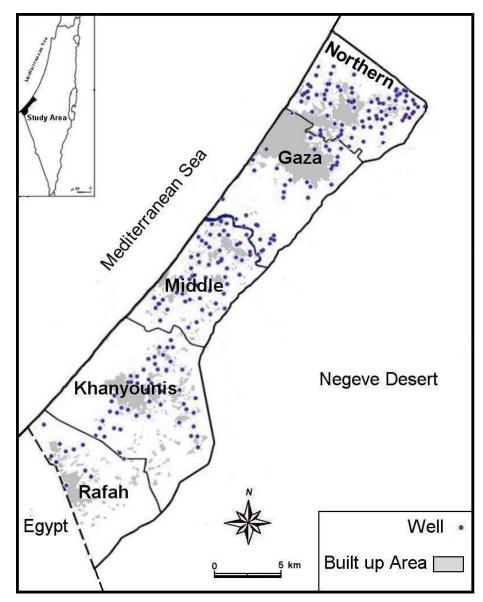


Figure 2 Governorates Distribution in Gaza Strip (https://www.refworld.org/docid/45d171362.html) UNHCR

Objectives of the SIA

The objective of this SIA is to determine and analyze – including nature and extent – project related social issues and risks pertaining to i. exclusion, ii. SEA/SH and GBV, iii. data privacy, iv. community health and safety, and v. any other risks identified during the assessment. Mitigation measures recommended in the SIA will be used to inform the design of activities/interventions (as appropriate) and included in the Project Operational Manual (POM), and any relevant guidelines, Standard Operating Procedures (SOPs) and technical specifications prepared for implementation. In order to address/mitigate exclusion challenges, the program will also explore the possibility of using innovative solutions to reach students in remote areas, including use of mobile libraries and laboratories.

Methodology and Limitations

Figure 3 demonstrates the methodology for the Environmental and Social Assessment (ESA) process for conducting the analysis that followed the World Bank guidelines that governed this study. In the preliminary project design phase, it was stated that the physical environmental elements will not be affected by the project components hence this study shall be based on the social aspects and risk mitigation in the targeted communities.

Key limitations during the preparation of the assessment were that (i.) not all stakeholders could be interviewed in follow-up face-to-face meetings to discuss any potential further comments/additional feedback; and (ii.) the latest available data, used for this assessment, is from 2020/21 and hence, there may be a small margin of error regarding the expected situation in 2022 and 2023.



Figure 3 Stages of the ESA process, World Bank, 2022

The methodology for the assessment includes, (i.) desk review of relevant project documents (also including the PAD, SEP and ESCP), (ii.) online interviews, and (iii.) data collected from the MOE and the Palestinian Central Bureau of Statistics (PCBS).

The assessment enabled verification of project stakeholders by studying the social context, flow of information, the hierarchy of the decision-making process in the educational system, and potential social risks (also elaborated in the stakeholder engagement plan). The assessment also helped verify project affected people, other interested parties, and vulnerable groups.

The direct stakeholders that were interviewed during the preparation of this SIA include: the General Education Department, Supervision and Education Qualification Department, D.G of Assessment, Evaluations and Examination, School Principals and Teachers, Educational Supervisors, Governorates Education Departments, Active Educators, Education Experts, Vulnerable and remote schools and Bedouin teachers and supervisors., Gender department at MOE, Special Education Department at MOE and the department of the Overall School Health at the MOE.

Additional key actors - such as MOE departments (responsible for education, child development, finance, IT and planning), university faculties of education, technical colleges, teacher professional organizations, educators, trainers, STEM Experts, developers of curriculum and teaching and learning materials (public and private), children's book authors, publishers, producers of children's entertainment, relevant NGOs and researchers - will be engaged with and consulted during the implementation of the program activities.

Face-to-Face meetings were conducted with different DGs at MOE, and a total of 7 online sessions were conducted with representatives from the directorates of the MOE and schoolteachers from the West Bank and Gaza to target all 18 directorates in the West Bank and 6 in the Gaza strip. The system for collecting data was established under the guidance of and in collaboration with the MOE. Between May 26th, 2022 and June 2nd, 2022, a total of 7 online sessions were conducted to include all 24 directorates of the MOE in the West Bank and Gaza. These directorates, along with the teachers and students, are identified as the direct stakeholders of the project. From each directorate at least one

field supervisor and one schoolteacher were interviewed through 'Teams' meetings. Total number of participants was 57. The main topics discussed included the potential risks of exclusion and inequitable access to program benefits, SEA/SH risks during face-to-face trainings, data privacy and information protection, community health and safety and any other or additional location specific problems which may constitute a risk to the project implementation. A summary of Social Risks/ Challenges and Mitigation Measures are included in Annex 1. Further risks that might hinder the implementation of the activities were also discussed for example, limited access to technology in schools in access restricted and remote areas (e.g. Gaza and other northern and southern West Bank governorates) due to lack of relevant digital infrastructure such as fiber optic lines.

> Analysis and Findings

This section includes the identified risks, based on the vulnerability of each community and the severity of each risk. The recommended mitigation measures are also proportionate to the level of the risk

The risks were identified with the support of specialized departments of MOE. For example, the general directorate for School Health which is responsible for monitoring and observing the learning progress of people with disabilities, gender and GBV/SH/SEA helped identify associated risks and recommend requisite mitigation measures. It was also agreed that monitoring from MoE and the PCU and effective implementation of an accessible, contextually suitable and responsive grievance mechanism (GM) will enable the risk mitigation and management system to function effectively.

Overall, the main issues raised during the online discussion sessions for the assessment are the same as the issues identified during the consultations, across locations, for the preparation of the SEP. Briefly, it was found that in middle districts of the West Bank and the West part of Gaza (i.e. Gaza city) the educational system is characterized by stable growth, a steady and established learning process, use of innovative ideas, and availability of more advanced electronic and technological services to students and teachers. In contrast, in the northern and southern districts of the West Bank and the availability of Gaza the communities face several difficulties on different levels. In these districts, the exclusion risk is higher, and the availability of technological services is not constant or reliable. Therefore, an education gap exists between the residents of these areas, particularly with regard to applying STEM and integrating technology into the educational system. Table 2 shows the questions/lines of inquiry discussed during the meetings.

Risks	Inquiries: ESO notes			
Exclusion (not being able to benefit equitably from project benefits)	 Teacher's background: are there qualified teachers to handle children with disabilities? Availability: are teachers available to train outside working hours including online courses? 			
	 Access to information: are there any marginalized/underserved areas in your location? 			
	• Special needs cases: is it possible for them to access technology in addition to that is their attendance at school on a regular basis?			
	 Marginalized groups: how, poverty and other social problems affect children's access to education in your community (example: children raised by single parents)? 			

Table 2 Issues discussed during the meetings

SEA/SH/GBV: (sexual exploitation and abuse, sexual harassment, gender-based violence)	 Women: can outside of working hours (study hours) cause increase in violence against women? Availability of protection against GBV? what are the current applied measures? Rural areas: is it socially acceptable for female students to be instructed by male teachers in your community?
	 E-Learning: Any heard of documented or undocumented GBV/SEA/SH through online sessions in the past years especially during lockdown? Digital space safety: is being engaged in online community accepted? Examples: Facebook groups, Instagram, social media in general.
Data privacy issues (information protection/breach)	 Digital Space: awareness and protection Access to technology: internet connectivity, school facilities and classrooms compatibility/adaptability to new technology, are there any hindering factors?
Community health and Safety	 Safety measures: in the face-to-face training, Digital space safety for women/Gender related concerns During Covid-19/ and any future health risk that might arise where protection and safety measures applied and is there a contingency plan?
Other location specific risk	 It is elaborated on in the sessions as a case-by-case scenario.

i. Exclusion

The main stakeholders under the risk of exclusion from the project benefits according to obtained data are:

- a. People with Disabilities, and
- b. Remote communities/ people in access restricted areas.

a. People with Disabilities

The MOE general directorate for special education is responsible for training educators and monitoring the special needs of children with disabilities in all governmental schools. The main objective of the directorate that coincides with the governmental strategy is to include all cases of disability into the average classrooms based on their age. To help students, reach their peers' level, the MOE created the resource rooms, in which the student learns based on his/her ability to comprehend the subjects. The resource rooms are a supplementary tool used to enhance knowledge of the students with disabilities in certain subjects. In each resource room there is a special trained teacher responsible for the room and for educating the student. However, these teachers are not specialized in language acquisition nor STEM learning which constitutes a risk for students with disabilities particularly in terms of language and STEM learning.. Therefore, it is recommended to include these teachers in the design of trainings as part of the project components. Based on how to: approach PWD through the new learning methodologies that are proposed in the project components; and provide language and STEM learning effectively to PWD. This process will enable students with disabilities to assimilate in regular classes with their peers and ensure their inclusion. In addition, the directorate team created the tool for educational assessment for learning difficulties; it is available in PDF format such that the

special education teacher can go through training to assess the students based on a criterion to identify the students with learning disabilities. Basically, the tool helps the teacher identify the disability in 3 manners: sensory, semisensory and abstract forms and can be used in identifying language and STEM abilities for the students. The model is available and can be applied in all schools, but the teachers would need special training to use the tool.

There are 7 types of disabilities present at the governmental schools in WB&G including articulation disorders, physical disabilities, visual impairment, partial hearing loss, deafness, blindness and mental disorders. According to the data obtained from the MOE, the total number of people with disabilities in the governmental schools is (5979 in the West Bank and 2375 in the Gaza strip). Figure 4 and Figure 5 demonstrate that the highest percentage is of articulation disorders in both the West Bank and Gaza. The exact number is (1612 cases in the West Bank and 702 in the Gaza strip). Since the project component 1 for the first phase is about building strong foundations for learning and wellbeing, it can be concluded that this particular type of disability requires attention in order to ensure achievement of subcomponent goals. Therefore, mitigation measures should be incorporated in designing the materials and methods of teaching and take into consideration the type of disability present among students in Palestinian schools. This will also have a positive impact on the total of 592,161 and 263,058 students registered in the governmental schools in West Bank and Gaza respectively, and will build on establishing the baseline towards achieving the second component goals. To ensure that students with disabilities are not left behind, Section 9 below includes a list of mitigation measures that are consistent with the seven types of disability identified. Examples of such measures include adapting printable materials for students with visual and hearing impairment to include Braille and audio learning.

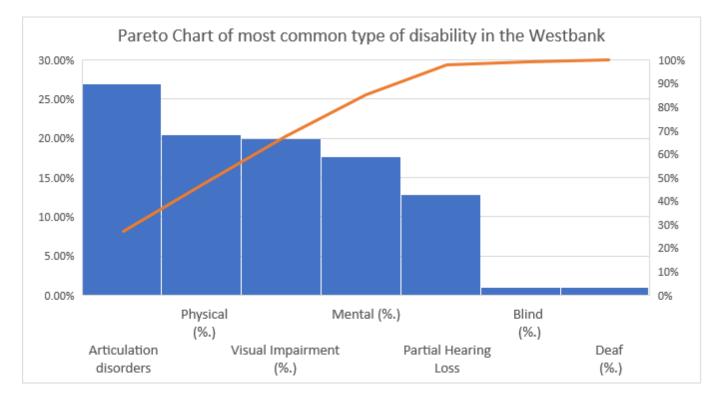


Figure 4 Type of Disability Distribution Percentage in the West Bank based on statistical data (2020-2021)

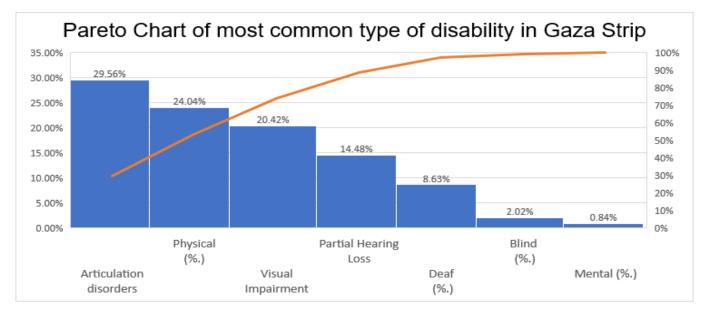


Figure 5 Type of Disability Distribution Percentage in the Gaza strip based on statistical data (2020-2021)

Data on the distribution of disabilities based on geographic area in the West Bank and Gaza, Figure 6 and 7, show that the percentage is highest in Nablus in the WB and in Khanyounis and Gaza middle area in the Gaza strip with the majority of the cases of visual and hearing impairments.

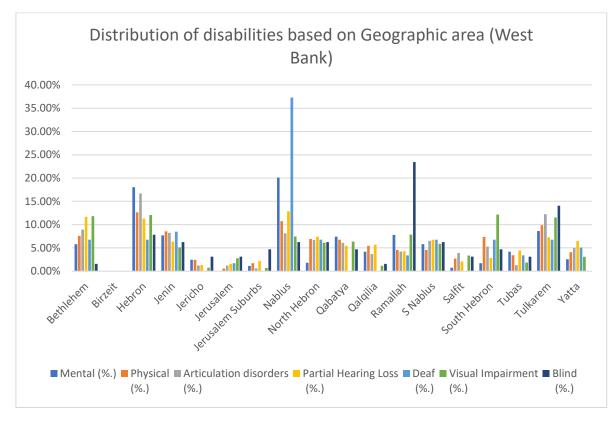


Figure 6 Distribution of disabilities based on Geographic area in the West Bank based on data from the MOE



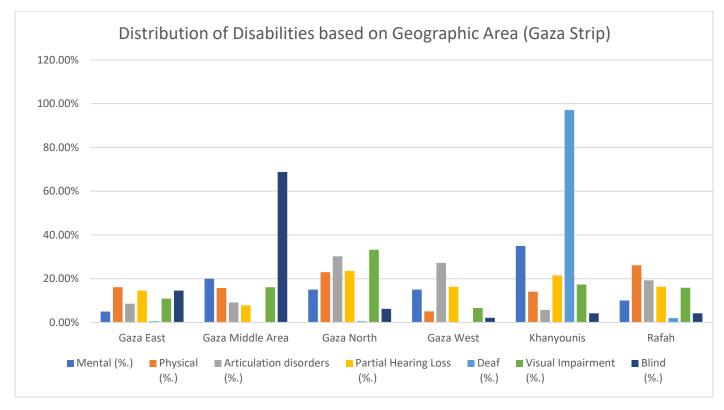


Figure 7 Distribution of disabilities based on Geographic area in the Gaza strip based on data from the MOE

b. Remote Communities/People in Access Restricted Areas.

As for the remote communities/People in Access Restricted Areas, Figure 8 and Figure 9 demonstrate the risk level. The lowest risk is rated "1" and the highest risk is rated "4" based on the data analysis. It is evident that the following communities face the risk of exclusion due to the presence of remote areas and the presence of communities that are in access restricted areas:

- West Bank: Qalqilia, South Nablus, Jerusalem, Bethlehem, Hebron, Yatta, South Hebron.
- Gaza: Gaza East and Gaza North are the directorates that face the risk of exclusion due to political boundaries and the presence of communities that are near clash areas.

Communities located in access restricted areas face seasonal factors that hinders their ability to attend schools and to commute and this can affect the progress of the first and second components of the project in those specific areas, therefore the mitigation measure needs to have a backup plan of special toolkits that can be distributed among students at the beginning of the scholastic year that contains elaboration with texts/audio and visual materials that helps them grasp the concept for each scheduled lecture in the case of missing out school days.

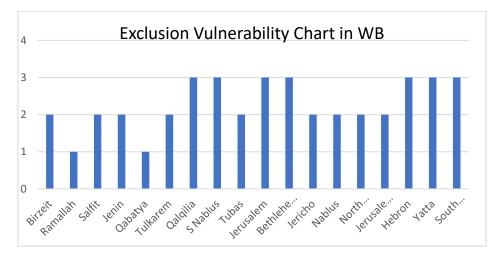


Figure 8 Exclusion vulnerability chart in the West Bank area

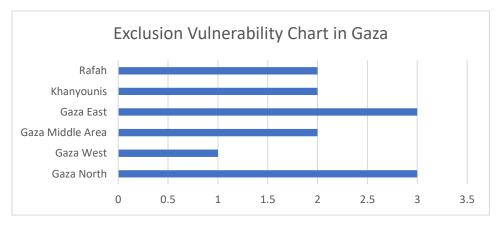


Figure 9 Exclusion Vulnerability chart in the Gaza strip area

ii. SEA/SH/GBV

The data on violence based on gender in Palestine can be observed in Figure 10 where it shows that 25% of children in the age group of (12-17) experienced violence at school, and Figure 11 shows that 17% of students experienced physical violence at school while 15% of students experience psychological violence. It shows that male students are even more susceptible to violence than women at educational institutions. Figure 12 shows the percentage of cyber violence against women and children in the West Bank and Gaza where the West Bank rates were higher. Figure 13 shows the percentage of children experiencing cyber violence through the use of social media networks where the female rates were higher than males. These findings highlight that it is extremely important to mitigate this problem with the inclusion of cybercrimes units at the police stations and provide awareness on cyber security in the community, as a whole, and at schools in particular. Consultation with the department head of the school health at the MOE indicated that, all schools follow the "policy of violence reduction" which is disseminated among all schools. The policy also includes the mechanisms for dealing with cases of violence against children both in school or outside school, including from family members. Depending on case severity, the child protection networks get involved in cases of violence against students inside or outside the premises of the school including the homes of the children. In some instances, such involvement of authorities can lead to relocation of vulnerable child survivors to "safe houses".

The methods/mechanisms used by MoE to increase students' awareness on violence issues is determined by age group. For example, plays are written and performed for children up to the fourth grade. Additional, age appropriate, awareness materials are available to increase awareness on dealing with bullying, cyber security and safeguarding issues. In addition to the policy of reduction of violence, there are two guidance manuals available for use by students and guidance counselors: "the guidance manual on safety using the internet" and "the guidance manual on protection against SEA and SH". A recommendation by the MOE, directly related to project components, is regarding career orientation for females. It is found that female students face difficulties in choosing their career path due to the stigma of working in male dominated professions. Not only is working in male dominated professions unacceptable to families, especially in rural areas, but working in such professions can also potentially increase the risk of GBV/SEA/SH for women as it is considered as an act of 'rebellion' against families and social norms. Women are therefore limited to working in sectors and professions that are seen as "acceptable" by society. It is therefore recommended that the project design will include activities such as career exploration and discussions that will help female students to approach career education in a mindful but effective way. It is further recommended that parents should also be in awareness sessions to reduce the potential risk of GBV/SEA/SH incidents.

The assessment also identified GVB violence experienced by teachers, including both men and women. It is recommended that the project design include activities in the school environment to allow students and teachers to interact in a responsible and respectful manner.

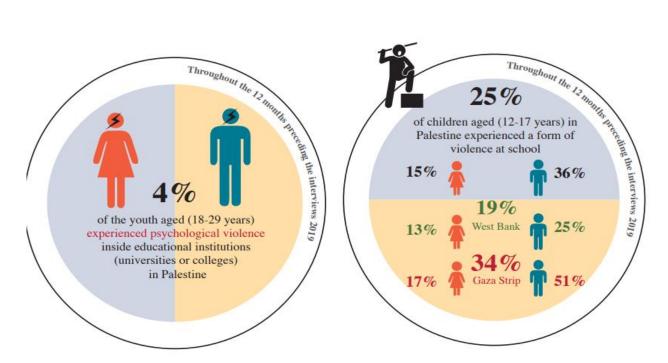


Figure 10 Gender Based Violence Statistics (GBV) at Schools, 2019 data PCBS

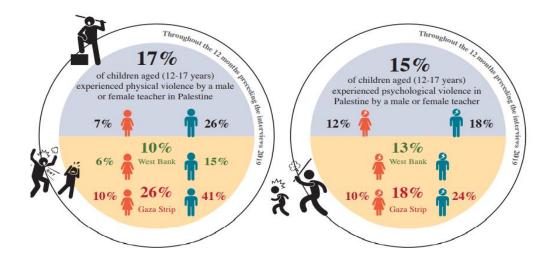


Figure 11 Gender Based Violence (GBV) at schools, 2019 data PCBS

1. 8% of currently married or ever married women (18-64 years) experienced a type of Cyber violence by others through their use of social media networks

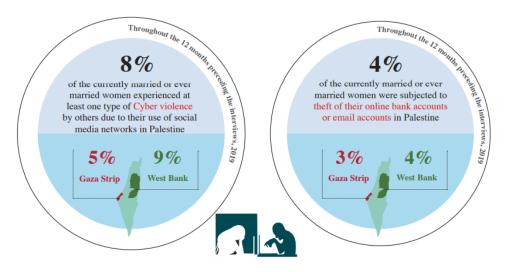


Figure 12: Cyber violence on Women, 2019 data PCBS

4. 9% of children (12-17 years) experienced a form of Cyber violence by others through their use of social media networks

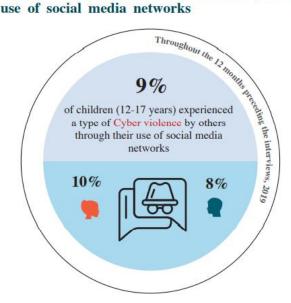


Figure 13: Cyber violence on children, 2019 data PCBS.

iii. Data privacy issues (information protection/breach)

Data privacy and security breach cases were encountered at the beginning of the Covid-19 lockdown and in the early stages of online teaching. However, with the help of the IT departments and in collaboration with the directorates, the system is now secure, and no further incidents have been reported. This improvement has been seen across the West Bank and Gaza. It is recommended that existing measures to maintain data privacy should be strengthened and further measures to build awareness of and provide training to avoid breach of data privacy should be supported under the project.

iv. Community health and Safety

Schools are constantly under the direct supervision of the MOE through its directorates and therefore facilities are regularly maintained. Throughout the Covid-19 pandemic there were regular health inspections to monitor the hygiene and sanitation practices of teachers and students, and the level of commitment throughout the West Bank and Gaza was high.

The social risks identified in the project are to be addressed in case of occurrence by the MOE. The MOE has departments for special education, overall school health and gender that targets the risks aforementioned. Each department has manual that deals with the cases that might appear and throughout previous years data has been recorded for any type of risks i.e. GBV/SH/SEA or any other incident that occurred and the mechanism for solving the problem was recorded.

Grievance Mechanism

There is a Complaints Unit at the Ministry of Education. The unit is part of the ministries' organizational structure and administered by Heads of Unit and equipped with trained staff. The Complaints Unit work is regulated by the Council of Ministers Decision No. (8) of 2016 and by the Procedure Manual No. (20/17) of 2017. Both documents are made public and published in Arabic on the ministries' websites. All schools follow the protocol for GM under the supervision of the advising counselor of the directorates of the MOE and all cases are reported and documented in the directorates' offices throughout the WB&G. Similarly, Il grievances received by the Complaints Unit in relation to the Project will be communicated to the ESO for handling and follow up.

The PCU has established a complaints system to meet the Early Childhood Development (ECD) project requirements. The grievance mechanism (GM) that was developed for and is being implemented for the ECD Project shall be strengthened to receive and facilitate the resolution of concerns and grievances in relation to the MPA Phase 1 SERATAC Project, in accordance with ESS10. The GM shall also receive, register and address concerns and grievances related to GBV/SEA/SH in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers. A detailed GM manual that includes guidelines on filing and handling complaints at the project's level has been prepared. MOE shall ensure that the mechanisms for submitting grievances will be communicated to all stakeholders and affected parties.

Recommendations and mitigation measures

This project shall have an overall positive impact on the Palestinian educational system. The risks indicated require special attention in some directorates, but they constitute less than 2% of total number of students. Therefore, they can be integrated into the system with modifications on the component output materials. Table 3 includes the risks and mitigation measure required to avoid each risk. These mitigation measures have been discussed within the PCU and the relevant technical teams at MOE and will be incorporated in the design of the relevant interventions. Briefly, the majority of the PWD at schools can be helped with the right tools provided for special learning. For the second type of risks of GBV/SEA/SH, the MOE has a clear plan for awareness, identification and mitigation measures for potential cases that can happen based on three protocols and in collaboration with the Juvenile court. The same applies for the data privacy and community health and safety issues. Regular monitoring visits are scheduled by the directorates' supervisors in WB&G and the level of commitment of the schools was observed to be high. Finally, the GM provides an additional mechanism to effectively deal with cases, including reporting, monitoring and follow up.

The SIA recommends the following mitigation measures:

i. Exclusion

The mitigation plan would be to target excluded groups and design measures to ensure that these groups have equitable access to project benefits across relevant intervention. These measures would be essential for the project to achieve its goals. Specifically, the following measures are recommended based on exclusion type:

People with Disabilities:

The guidelines for establishing the resources and sensory rooms by the MOE cover all 7 disability types (Articulation disorders, physical disabilities, visual impairment, partial hearing loss, deafness, blindess and mental disorders). These disability types are also covered in this assessment and recommended mitigation measures are provided such as: establishing sensory rooms for students with visual impairment, blindness, partial hearing loss, deafness and any mental disorder and providing the resources room with necessary equipment and materials to support students with all kind of disability. Other mitigation measures include:

- Improving the visibility of the project and have the E&S instruments well displaced at the MOE website. Distribute a note (handout) about the project activities among the beneficiaries.
- Creating a resources room in each school that does not have one for the grades (1-4) based on the guidelines from the special education directorate; the MOE created the guidelines for the teacher of the resources room and the guidelines for the resources room.
- Inclusion of the resources room teacher into the capacity building components of the project.
- Enhancing Knowledge exchange within MENA region and superimposing of successful countries' system of educating PWD onto Palestine.

- Having a sensory room, in addition to the resources room, where people with sensory disabilities can benefit. Such rooms are present in a few schools, but they require special computer programs with annual subscription and are expensive to construct (one room exceeds 25,000 USD). Therefore, it is recommended to have the IT program either embedded into the MOE's system or be available as open source.
- Adapting printable materials with visual and hearing impairment such as Braille and audio learning.
- Annual training and capacity development for resources room teachers in addition to generalizing the method of dealing with PWD to other home room teachers.
- Digital accessibility of students with disability is to be ensured by providing materials required for online teaching. During COVID-19 such students were unable to receive online learning due to their disabilities.
- Ensuring universal access to all facilities (Labs, canteen, resources rooms etc.) for PWD including technology rooms such as computer labs and its features.
- Establishing a general guideline for the directorate on the standards for evaluating PWD, currently there is no such system due to the lack of capacity in identifying the criteria and methodology of evaluation as the PWD undergo the standardized testing imposed by the government with no regards to their special needs.
- Help in providing the tools for diagnosis and rehabilitation of students with disabilities as a complete governmental center.
- > Women and people in Access Restricted and Remote Areas:
 - Inclusion of awareness sessions on professional guidance regarding certain career paths that is considered a male/female dominated industry
 - Provide additional bus or a new route to reach community in areas with restricted access.
 - Design special toolkits that can be distributed among students in restricted access areas at the beginning of the school year which contain explanations/guides with texts and audio and visual materials. Such material will help students to learn and keep up with concepts in case they miss some school days.

ii. SEA/SH/GBV:

To address this risk, it is recommended the relevant guidelines and policies available with the MOE should be used effectively. Specific GBV/SEA/SH grievance redress channels should also be developed, and where they exist these should be strengthened, to ensure complaint and victim's anonymity and information confidentiality. Assigned staff and trainers will sign the CoC and MOE/PMU will ensure that these personnel read and understand the clauses of the CoC highlighting those aspects related to public service, obligations and responsibilities. The assessment also identified GVB experienced by teachers, both men and women. It is recommended that the project design include activities that allow students and teachers to interact in a respectful and responsible manner.

iii. Data Privacy Issues

Students and teachers shall receive trainings/awareness raising about data privacy issues, how to protect themselves, and how to report cases/instances of potential data breach attempts. Online security is applied to all schools, directorates and the MOE through password protection and single use access number password. It is necessary to continue stakeholder engagement, as required and appropriate, and to update the stakeholders on the progress of the project implementation and inform them of the social risks. Ensure a well-functioning and accessible grievance mechanism system including uptake channels for GBV/SEA/SH and data breach related complaints in line with the SEP.

iv. Community Health and Safety

Provide trainings and workshop to educators and teachers on the identified health and safety risks and mitigation measures. Ensure the availability of a well-functioning GM. Health and safety procedures are available by the MOE and apply to all schools. Workers' safety regulations apply (refer to LMP).

Each identified risk mentioned in the sections above shall be taken into consideration in mitigation action with respect to the following project components:

- 1. Building strong foundations for Learning and Wellbeing:
 - a. Develop an Arabic literacy strategy
 - b. Improve grades 1-4 Arabic language arts instruction (reading, writing, speaking and listening)
 - c. Further develop preservice teacher education
 - d. Promote positive school and classroom climates conducive to student learning and wellbeing
- 2. Harnessing Technology to improve STEM learning and better equip students for the labor market
 - a. Strengthen and operationalize MOE's STEM framework
 - b. Improve upper primary (Grades 5 to 6) students' mathematics, science and digital skills
 - c. Lay the foundations for an effective career guidance system that helps secondary students make informed career choices and be better equipped to pursue them.
- 3. Strengthening the student learning assessment system:
 - a. Strengthen the policy framework and 5th Grade NLSA
 - b. Support the Tawjihi reform and increase secondary students' career pathways
 - c. Promote participation in international assessment.

The following table summarizes the findings and the mitigation actions to be taken:

Risk	Target group	Details	Mitigation measure	Cost/USD
Risk Exclusion	Target group PWD(Articulation Disorders, Physical Disabilities, Visual Impairment, Partial Hearing Loss, Deafness, Blindness and Mental Disabilities	Details Rooms of resources is not available in all schools and it only covers grades (1-4), the materials provided should include universal	 Mitigation measure Creating a resources room in each school for the grades (1-4) based on the guidelines from the special education directorate; the MOE created the guidelines for the teacher of the resources room and 	Cost/USD Resources Room: 7,000 per room Sensory room: 25000 per room Additional costs to be determined during the detailed design of relevant activities.
		access to all disabilities	 the guidelines for the resources room. Inclusion of the resources room teacher into the capacity building components of the project. 	

Table 3 Summary of Risks and Recommended Mitigation Actions

 Knowledge exchange within MENA region and superimposing of successful countries' system of educating PWD onto Palestine. Having a sensory room in addition to the resources room, where people with sensory disabilities can benefit. Such rooms are present in few schools but they require special computer programs with annual subscription therefore it is recommended to have the program either embedded into the MOE's system or be available as open source. Adapting printable materials with visual and hearing impairment such as Braille and audio learning. Annual training and capacity development for resources room teachers. Digital accessbility of budget with 	[,
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			on professional guidance regarding certain career paths that is considered a male/female dominated industry	
	Access restricted areas,	Bus from the MOE is available for commute, one bus per community and when it breaks down no other alternative available	Provide additional bus/mobile library or a new route to reach community. Design special toolkits that can be distributed among students in restricted access areas at the beginning of the school year that includes explanations/guides and audio and visual materials to help students catch up with learning and concepts in case they miss some days of learning or school.	Mobile library: 35,000 USD per unit. Additional costs to be determined during the detailed design of relevant activities.
	Gender	Attendance for males/females to school can be seasonally affected	Ensure attendance monitoring and mobility library that helps students remain concise with curriculum	TBD by the technical team during the design of activities.
SEA/SH/GBV	Females and Males		MOE will apply its Protocol to prevent SEA/SH/GBV incidents in schools. Protocol includes: 1. The policy of violence reduction 2. The guidance manual on safety using the internet 3. The guidance manual on protection against SEA and SH Assigned staff and trainers shall sign the CoC and MOE/PMU will ensure that	Under the responsibility of the MOE

		they read and understand the clauses of the CoC highlighting those aspects related to public service, obligations and responsibilities. The assessment also identified GVB experienced by teachers, both males and women. It is recommended that the project design include activities in the school environment to allow students and teachers to interact in a respectful and responsible manner.	Cost to be determined by the technical team during the design of activities
Data Privacy Issues	Students and Teachers data	 Students and teachers shall receive trainings/awareness raising about data privacy issues, how to protect themselves, and how to report cases/instances of potential data breach attempts Online security is applied to all schools, directorates and the MOE through password protection and single use access number password. It is necessary to continue stakeholder engagement, as required and appropriate, and to update the stakeholders on the 	If additional security is required cost to be determined by the technical team during the design of activities.

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			progress of the	
			project	
			implementation and	
			inform them of the	
			social risks.	
		•	Ensure a well-	
			functioning and	
			accessible grievance	
			mechanism system	
			including uptake	
			channels for	
			GBV/SEA/SH related	
			complaints in line	
			with the SEP.	
Community Health and		•	Provide trainings	
Safety		-	and workshop to	
			-	
			teachers on the	
			identified health	
			and safety risks and	
			mitigation	
			measures. Ensure	
			the availability of a	
			well-functioning	
			GM.	
		•	Health and safety	
			procedures are	
			available by the	
			MOE and apply to all	
			schools.	
		•	Workers' safety	
			regulations apply	
			(refer to LMP).	

ANNEX 1

Summary of Social Risks/ Challenges and Mitigation Measures

Risks	Inquiries: ESO notes	Main problems/ Challenge	Mitigation Measures
Exclusion (not being able to benefit from project benefits)	Teacher's background: are there qualified teachers to handle children with disabilities?	Remote areas, poverty, mobility, problems of continuing education after 4th grade	 Providing mobility and safe access to their community Creating a resources room in each school for the grades (1-4) based on the guidelines from the special education directorate; the MOE created the guidelines for the teacher of the resources room and the guidelines for the resources room. Inclusion of the resources room teacher into the capacity building components of the project. Knowledge exchange within MENA region and superimposing of successful countries' system of educating PWD onto Palestine. Having a sensory room in addition to the resources room; where people with sensory disabilities can benefit from; such rooms are present in few schools but they require special computer programs with annual subscription therefore it is recommended to have the program either embedded into the MOE's system or be available as open source. Adapting printable materials with visual and hearing impairment such as Braille and audio learning.

		 Annual training and capacity development for resources room teachers in addition to generalizing the method of dealing with PWD to other home room teachers. Digital accessibility of students with disability is to be ensured by providing materials required for online teaching; during COVID-19 such students were unable to receive online learning due to their disabilities. Ensure all facilities (Labs, canteen, resources rooms, etc) are compatible with PWD including technology rooms such as computer labs and its features. Establishing a general guideline for the directorate on the standards for evaluating PWD, currently there is no such system due to the lack of capacity in identifying the criteria and methodology of evaluation as the PWD undergo the standardized testing imposed by the government with no regards to their special needs. Help in providing the tools for diagnosis and rehabilitation of students with disabilities as a complete governmental center.
	Training did not include all schools	propose training schedule to schools in dealing with special needs

		Not enough expertise in dealing with special needs (especially autistic cases) Lack of training for teachers to work with Students with Disabilities	Special training for teachers (inclusion beyond the 4th grade)
	·	School facilities are not compatible with the disability needs	Require special handling of students with disabilities
		Integration of people with disabilities into the school	awareness sessions for students and parents to confront and integrate people with special needs and their integration with the school
		no inclusion of deaf students in the governmental schools	Inclusion and training for teachers is required, specified training materials for students to be provided (written material, visual material)
		Teams+ E-schools training requirement	need for a comprehensive training schedule to use Teams elements in an efficient way
		The teaching staff face problems during their commute to the areas due to the military trainings	alternative online option of the training
available to	are teachers train outside urs including ses?	Electricity cut off which is more than 8 hours per day hinders online learning. (Gaza)	try to make any training in the times the electricity is on, or to reschedule when needed, or make sure training sessions are recorded to be used when electricity is on
		male teachers often can't commit for they have other commitments	try to make any trainings in the most acceptable time for all
		for some female teachers this can be a problem	provide instructions and information to assure for females and their families that it is safe and valuable
		some teachers don't know how to use online resources	may ask for specific training or transfer of knowledge in the area from those who know; to those who doesn't

		Lack of Technology labs in schools	Try to provide access from alternatives
		Bedouin community, under threat of demolish from military of occupation, no established amenities	provide alternative premises
		during clashes with military occupation there is no access to schools	 Provide Electronic-online sessions Provide additional bus or a new route to reach community
		access to online sessions depends on number of siblings at school, number of devices	schedule online sessions for siblings on different times
	Access to information: are there any marginalized/underserved areas in your location?	Economic situation, school environment and culture may hinder access to information	Design special toolkits that can be distributed among students in restricted access areas at the beginning of the school year that includes explanations/guides and audio and visual materials to help students catch up with learning and concepts in case they miss some days of learning or school.
		for some areas, they use a special bus provided by the MoE other than that they can't get to the schools, when the bus breaks down it is considered as a day off from school	Make sure there's always a bus for these areas to be used; or an alternative online option when needed
		Electricity cut off in some areas/ like Gaza	provide recorded sessions/ printed materials to make sure there's access to any information
	Some areas barely have electricity so there is no internet connections, some have no cellphones or technology (Bedouin communities)	for such places, procedures must be taken to ensure access of these groups to information, printed materials; filed visits to their places and conducting face to face sessions	

	Special needs cases: is it possible for them to access technology in addition to that is their attendance at school on a regular basis?	Visual disability problems	need to provide audio recordings, talking computers/ devices, special printouts
		social out casting The coverage of remote areas is not smooth, and the schools of the old city (H2 area) are among the difficult areas to communicate and reach	students and social awareness is needed try alternatives to reach them
		Lack of special needs student data and contact info to communicate with them	try to benefit from other institutions who work with special needs cases, and obtain data from them
		the economy is the hindering factor	try to provide alternatives for those with poor economic situation
		access to internet is through Palestinian telecommunications but it is not constant and there are cut offs (not just for special needs)	better quality internet
		inclusion at schools is sometimes difficult for handicapped due to lack of facilities	try different alternatives; to reach them at homes, or promote students social responsibility
		in some areas schools are behind the wall are difficult to monitor due to restrictions to movement and checkpoints	provide internet and remote learning
	Marginalized groups: how, poverty and other social	lack of technology labs (mandatory in the curriculum) in some schools	try to provide alternatives at school or from other institutions in the area
	problems affect children's access to education in your	Attendance for girls is higher than of boys	Special buses provided by the MoE

	community (example: children raised by single parents)?	in some areas technology is limited in some areas, there are family restrictions to the use of social media on moral basis	 Ensure attendance monitoring and mobility library that helps students remain concise with curriculum try to provide alternatives instructions and procedures on use of socail media for education and disseminating these to the parents to ensure their female kids are safe (closed groups, females groupsetc)
		some people with hearing/ vision impairments, or slow learners affect their access to education	Audio programs and audio material to be produced for people with visual impairments, slow learning, dealing with written and highly detailed material
		poverty in some areas leading to dropping out of schools	awareness to students and their parents
SEA/SH/GBV: (sexual exploitation and abuse, sexual harassment, gender based violence)	Women: can outside of working hours (study hours) cause increase in violence against women? Availability of protection against GBV? what are the current applied measures?	Difficulty outside working hours/ not GBV related- mobility issue to reach areas outside small communities	 SEA,SH and GBV incidents in schools. Protocolinclude .: 1. The policy of violence reduction 2. The guidance manual on safety using the internet 3. The guidance manual on protection against SEA and SH Assigned staff and trainers shall sign the CoC and MOE/PMU will ensure that they read and understand the clauses of the CoC highlighting those aspects related to public service, obligations and responsibilities.
		Usually women teachers avoid working outside normal working hours to avoid GBV,SEA,SH	try to commit to their working hours, or provide online sessions if possible

		no documentation, privacy and secrecy is high in some areas, There is psychological pressure and cases of verbal violence, but no cases were officially registered	ensuring the data privacy, and that it remains in the schools premises and gender department
	Rural areas: is it socially acceptable for female	there is a problem with that and in some parts there is a bigger load on the female teachers to teach high school males	commit to community boundaries, or provide alternatives, social awareness
students to be instructed by male teachers in your community?	co-ed in general is a cultural issue not accepted in many areas, mostly It is unacceptable for high school students, only primary	commit to community boundaries, or provide alternatives, social awareness	
	E-Learning: Any heard of documented or undocumented GBV/SEA/SH through online sessions in the	Yes, GBV in words, during online sessions	set clear regulations when conducting online sessions
past years especially during lockdown?	some intermissions due to inappropriate conduct but is controlled		
	Digital space safety : is being engaged in online community accepted? Examples: facebook groups, Instagram, social media in general.	Accepted within certain boundaries, non- co-ed communities	cyber security training
Data privacy issues (information protection/breech)	Digital Space: awareness and protection	in some areas, previous records showed breach of information in the early stages of online teaching	 Students and teachers shall receive trainings/awareness raising about data privacy issues, how to protect themselves,

		 and how to report cases/instances of potential data breach attempts Online security is applied to all schools, directorates and the MOE through password protection and single use access number password. It is necessary to continue stakeholder engagement, as required and appropriate, and to update the stakeholders on the progress of the project implementation and inform them of the social risks. Ensure a well-functioning and accessible grievance mechanism system including uptake channels for GBV/SEA/SH related complaints in line with the SEP. laws and regulations are to be provided at the beginning of each online session, and more precautions should be taken by IT staff
Access to technology:	internet is slow in some areas	try to provide more speed, if could be, or provide alternatives, like use of other institutions in the area as a king of social responsibility
internet connectivity, school facilities and classrooms	some areas lack devices and technology labs/ computers	provide alternatives, like use of other institutions in the area as a king of social responsibility
compatibility/adaptability to new technology, are there any hindering factors?	some people have little knowledge in using technology	training on the use of certain programs and portals, teachers, students and parents
	some areas have poor electricity	try to provide alternatives, recorded sessions, printed materialetc

Community health and Safety	Safety measures: in the face to face training, Digital space safety for women/Gender related concerns During Covid-19/ and any future health risk that might arise where protection and safety measures applied and is there a contingency plan?	occupation hazard - constant threat for civilians in these communities there are more than 50 students per classrooms which makes it difficult to adhere to hygienic standards	 Provide trainings and workshop to educators and teachers on the identified health and safety risks and mitigation measures. Ensure the availability of a well-functioning GM. Health and safety procedures are available by the MOE and apply to all schools. Workers' safety regulations apply (refer to LMP).
		Mobility, occupation check points and hazards Schools close to the military point - clashes and threats on students from the occupation forces	
		remote villages and schools behind the separation wall	
		co-ed is not acceptable within the community	
Other location specific risk	Case by case scenario	Psychological issues of the special needs cases	
		STEM is weak at schools, grades 10+ 11 have no guidance about what career path to take	Additional tools for teaching to be embedded into the educational system
		Current issue: electronic games is causing students to underperform at school	mitigate current challenges and technology into an advanced teaching methodology
		some schools are caravans and not actual buildings	