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INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT

ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT

ON A

PROPOSED LOAN

IN THE AMOUNT OF US\$50 MILLION

TO

BARBADOS

FOR THE

BARBADOS EDUCATION SECTOR TRANSFORMATION OPERATION

February 27, 2026

Education Practice Area

Latin America And Caribbean Region

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ABBREVIATIONS

TERM	EXPANDED TERM/ DEFINITION
BERT	Barbados Economic Recovery and Transformation Plan
BEST	Barbados Education Sector Transformation Program
CARICOM	Caribbean Community
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
C-ESMP	Contractor Environmental and Social Management Plan
DLI	Disbursement-linked Indicators
E&S	Environmental and social
EIA	Environmental Impact Assessment
ESHS	Environmental, Social, Health and Safety
ESSA	Environmental and Social System Assessment
GIIP	Good international industry practice
GRM	Grievance Redress Mechanism
HRD	Human Resource Development
IADB	Inter-American Development Bank
IEE	Initial Environmental Evaluation
IETWC	Inter-departmental Education Transformation Working Committee
ILO	International Labour Organization
MEdT	Ministry of Education Transformation
OSH	Occupational Safety and Health
PAP	Program Action Plan
PDO	Program Development Objective
PforR	Program for Results
PPE	Personal Protective Equipment
SBRC	Sustainable Barbados Recycling Centre
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SSA	Sanitation Service Authority

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Executive Summary

1. The Barbados Education Sector Transformation (BEST) Program is a flagship initiative of the Government of Barbados, which is part of the education transformation agenda to modernize the education system and improve learning outcomes for all children. Anchored in the Strategic Plan (2022–2027), the Program seeks to enhance foundational learning and expand access to modern, climate-resilient, and inclusive learning environments at the pre-primary and primary levels. It aligns with national priorities under the Barbados Economic Recovery and Transformation Plan (BERT) and global commitments under the Education 2030 Framework and the UN Sustainable Development Goals.

Purpose of the ESSA

2. The Environmental and Social Systems Assessment (ESSA) is a core requirement under the World Bank's Program-for-Results (PforR) financing instrument. It evaluates the country's systems for managing environmental and social (E&S) risks and impacts, identifies gaps, and recommends actions to strengthen these systems. The ESSA ensures that the Program maximizes E&S benefits while minimizing risks and informs the Program Action Plan (PAP).

Program Objectives and Structure

3. The Program Development Objective (PDO) is to enhance foundational learning and improve access to modern, climate-resilient, and inclusive learning environments for children at the pre-primary and primary levels in Barbados. The Program is organized around two results areas:

- a. **Results area 1: Enhanced Foundational Learning** through targeted literacy and numeracy programs, integration of educational technology, improved assessment systems, strengthened teacher development, and by expanded access to early childhood education (ECE) for 3- and 4-year-olds as a critical foundation for their school readiness and foundational learning.
- b. **Results Area 2: Improved Access to Modern, Climate-Resilient, and Inclusive Learning Environments** by refurbishing primary school facilities, strengthening digital connectivity, and ensuring climate resilience and energy efficiency, and by ensuring that primary schools are prepared to support students with special educational needs.

4. These interventions aim to benefit approximately 23,000 students who will be enrolled in public nursery and primary schools across Barbados during the Program period, and reinforce Barbados' commitment to inclusive, high-quality education.

Environmental and Social Effects

5. The ESSA concludes that the Program will generate predominantly positive impacts, including improved learning outcomes, gender-sensitive and inclusive education, and climate-resilient infrastructure. Environmental benefits include energy efficiency, green building practices, and enhanced resilience to climate risks.

6. Potential environmental risks are localized and reversible, primarily associated with small-scale refurbishment works (construction waste, dust, noise, and occupational health and safety hazards). Social risks include potential exclusion of vulnerable groups (students with disabilities and low-income households), risks of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) during construction, and temporary disruptions to learning. These risks can be effectively mitigated through targeted measures integrated into Program design.

Assessment of National Systems

7. The ESSA is guided by six Core Principles established under the World Bank’s PforR Policy. These principles set minimum standards for managing environmental and social risks and promoting sustainability:

- a. Promote environmental and social sustainability in Program design, avoid or mitigate adverse impacts, and ensure informed decision-making.
- b. Protect natural habitats and cultural resources, avoiding activities that could cause significant conversion or degradation.
- c. Ensure public and worker safety, including managing risks from construction, hazardous materials, and natural hazards.
- d. Avoid or minimize displacement and loss of livelihoods by managing land acquisition and access to resources.
- e. Promote equitable access to Program benefits, paying special attention to vulnerable groups and cultural appropriateness.
- f. Prevent exacerbation of social conflict, particularly in fragile or sensitive contexts.

8. The ESSA assesses Barbados’ systems against these principles, identifies gaps, and proposes measures to strengthen alignment.

9. Barbados’ legal and regulatory framework broadly aligns with the six core principles of the PforR Directive. However, gaps exist in institutional capacity, stakeholder engagement, management of grievances and standardized E&S procedures for small-scale works. The Ministry of Education Transformation (MEdT) does not have dedicated E&S specialists and formalized protocols for managing risks.

Consultation Process

10. The consultation process was conceived as a genuine platform for dialogue to foster meaningful engagement between government agencies, key stakeholders and the World Bank team. This process began in September 2025, with a series of conversations and written exchanges with the MEdT that informed the development of the first draft of the ESSA and Program Action Plan. Building on this foundation, the dialogue continued throughout October and November, culminating in three formal workshops on November 6th and December 11th, 2025, and January 19th, 2026.

11. The draft ESSA report was publicly disclosed by the Bank on December 3rd, 2025, and by the Government of Barbados on January 7th, prior to Program appraisal. Stakeholders’ perspectives and suggestions have been considered to finalize the ESSA.

Key Recommendations and Actions

12. To strengthen E&S systems and ensure sustainable outcomes, the ESSA recommends:
- a. Establishing an institutional grievance mechanism accessible to all stakeholders.
 - b. Engaging E&S, gender, and stakeholder engagement specialists and providing capacity-building training.

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- c. Developing a stakeholder engagement strategy to ensure meaningful participation of teachers, unions, and communities.
 - d. Implementing environmental screening for refurbishment works and requiring contractor E&S management plans as well as integrating E&S requirements into procurement documents, including codes of conduct, OHS measures, and waste management plans.
13. The Program excludes activities involving land acquisition, work in protected areas, or use of hazardous materials. These measures aim to strengthen Barbados' systems, promote sustainability, and ensure equitable access to education benefits.

DRAFT for consultation

1. Introduction

1. The Government of Barbados is implementing a comprehensive education transformation agenda anchored in the Ministry of Education Transformation’s Strategic Plan. The 2022-2027 Strategic Plan was developed to facilitate strategic planning and the implementation of comprehensive changes within the Barbadian educational system. By identifying five strategic goals encompassing twenty-two priority areas, the Strategic Plan operationalizes the Government of Barbados’ education transformation agenda. Initially developed for 2022-2027, it is being updated and extended until 2030.

2. The Barbados Education Sector Transformation (BEST) Program will particularly support Strategic Goals 1 through 3 of the Strategic Plan aimed at: (i) enhancing overall student learning and achievement outcomes across the national education system (Goal 1); (ii) enhancing teacher quality and development, as well as overall school leadership (Goal 2); and, (iii) improving the physical infrastructure and the technological, digital, and innovative profile of the education system (Goal 3). Therefore, the Strategic Plan will serve as the overall program boundary for the BEST Program which is processed as a Program for Results (PforR).

3. For each proposed PforR operation, the Bank assesses at the Program level, the potential Environmental and Social (E&S) effects of the operation (including direct, indirect, induced, and cumulative effects, as relevant); the borrower’s capacity (legal framework, regulatory authority, organizational capacity, and performance) to manage those effects; and the likelihood that the proposed operation achieves its E&S objectives.

4. The ESSA refers both to the process for evaluating the acceptability of a borrower’s system for managing the Program’s E&S risks of the operation, as well as to the final report that is an output of that process. Alongside the ESSA, the PforR preparation process includes a Technical Assessment, which reviews the Program’s strategic and operational soundness, and a Fiduciary Assessment, which examines financial management and procurement systems.

5. The ESSA aims to ensure that the Program maximizes E&S benefits while minimizing risks. It identifies gaps and informs the Program Action Plan (PAP) to strengthen E&S management systems. The assessment also considers occupational health and safety and evaluates access barriers for vulnerable groups, such as students with disabilities.

1.1 Government Program

6. The “Reimagining Education in Barbados – Every Child Barbados” Program is aligned with the BERT 2022 Plan and the Education 2030 Framework of Action. It advances the United Nations 2030 Agenda for Sustainable Development including Sustainable Development Goals, as well as the Caribbean Community (CARICOM) Human Resource Development (HRD) 2030 Strategy Outcome 3: Improved quality and delivery in all HRD sectors. The program aims to modernize the education system to meet evolving socio-economic needs, focusing on foundational learning, inclusive education, and climate-resilient infrastructure. Key initiatives include curriculum reform, teacher professional development, expansion of early childhood education, integration of educational technology, and investments in school infrastructure. The government program covers all education levels through secondary education, serving approximately 45,000 students and financed under the Ministry of Education Transformation (MEdT) budget lines, including domestic funds and financing of development partners.

7. The education transformation agenda is anchored in the MEdT’s Strategic Plan. The 2022-2027 Strategic Plan was developed to facilitate strategic planning and the implementation of comprehensive changes within the Barbadian educational system. It emphasizes the importance of a structured approach

to planning, ensuring that changes are aligned with long-term goals and effectively implemented. The BEST Operation will particularly support Strategic Goals 1 through 3. It will not directly support the achievement of Goal 4, which is to strengthen MEdT, and Goal 5, which is focused on strengthening the regulatory framework for the education sector.

1.2 ESSA Objective

8. The ESSA seeks to ensure that program supported by PforR financing is implemented in a way that maximizes potential E&S benefits, while avoiding, minimizing, or mitigating adverse E&S impacts and risks. The findings of the ESSA contribute to the preparation of the PAP, which outlines actions to address significant gaps in E&S management systems, in line with the sustainability principles of the Program-for-Results Policy.

1.3 ESSA Methodology

9. According to the Program for Results Guidance, the ESSA:
- a. analyzes the E&S effects, including indirect and cumulative effects, of activities associated with the defined Program
 - b. analyzes the borrower’s systems for managing the identified E&S effects, including reviewing practices and performance track record
 - c. compares the borrower’s systems—laws, regulations, standards, procedures, and implementation performance—against the core principles and key planning elements to identify any significant differences between them that could affect Program performance
 - d. formulates recommended measures to address capacity for and performance on policy issues and specific operational aspects relevant to managing the Program risks
10. The Core principles establish the minimum requirements a program must meet to ensure that E&S impacts are properly managed. They also aim to strengthen country systems and promote sustainable development outcomes.
- a. Core Principle #1: Program E&S management systems are designed to (i) promote E&S sustainability in the Program design; (ii) avoid, minimize, or mitigate adverse impacts; and (iii) promote informed decision-making relating to a Program’s E&S effects.
 - b. Core Principle #2: Program E&S management systems are designed to avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program. Program activities that involve the significant conversion or degradation of critical natural habitats or critical physical cultural heritage are not eligible for PforR financing.
 - c. Core Principle #3: Program E&S management systems are designed to protect public and worker safety against the potential risks associated with (a) the construction and/or operation of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.
 - d. Core Principle #4: Program E&S systems manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards.

- e. Core Principle #5: Program E&S systems give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of Indigenous Peoples/Sub-Saharan African Historical Underserved Traditional Local Communities, and to the needs or concerns of vulnerable groups.
 - f. Core Principle #6: Program E&S systems avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.
11. The ESSA determines whether all core principles, or only a subset, are applicable to the Program. It then analyzes the system by comparing it against these principles to assess alignment and identify any gaps that may require additional measures.

1.4. ESSA consultation process

12. The consultation process was conceived as a platform for dialogue to foster meaningful engagement between government agencies, key stakeholders and the World Bank team. Its purpose was to ensure that the ESSA reflected real institutional practices and stakeholder perspectives, while shaping targeted actions under the PAP.
13. This process began in September 2025, with a series of conversations and written exchanges with the MEdT and its Transformation Unit. These early interactions provided critical insights into existing E&S management practices, institutional arrangements, and stakeholder experiences. Guided by a structured questionnaire, these discussions generated valuable documentation and sparked dialogue on MEdT's experience with other donors and opportunities for improvement.
14. Building on this foundation, the dialogue continued throughout October and November, culminating in a formal workshop on November 6, 2025, with representatives of multiple government departments. Prior to the meeting, participating agencies had received the draft ESSA report to allow for informed discussion. The World Bank team presented the BEST Program, the findings of the ESSA, and preliminary recommendations. The workshop was highly interactive, with participants raising questions, sharing concerns, and offering constructive suggestions. Key contributions included:
- Strengthening the gender lens of the Program through equitable access, gender-sensitive content, and gender-disaggregated data
 - Ensuring inclusive and participatory processes for meaningful engagement.
 - Highlighting the societal impact of educational transformation and its alignment with initiatives from other ministries.

The workshop also underscored the need for dedicated personnel within MEdT to manage E&S aspects, stakeholder engagement, and gender equity. Concerns about the risk of excluding economically vulnerable students—due to limited technology access or unequal family support—were integrated into the ESSA analysis. These insights prompted MEdT to *recommend* reinforcing its team with specialists in gender and participation, directly influencing the PAP's design.

15. Further engagement took place on December 11, 2025, when the Bank presented the updated program design and revised ESSA, incorporating feedback from earlier consultations. Discussions focused on proposed E&S actions for the PAP, including:
 - Establishing an institutional grievance mechanism for stakeholders.
 - Strengthening MEdT’s capacity by engaging professionals in environmental and social risk management, stakeholder engagement, and gender inclusion.
 - Developing and implementing a stakeholder engagement strategy.
 - Creating a screening checklist for E&S risks in school refurbishment.

16. A third consultation meeting was held on January 19th, 2026, with representatives of teachers’ unions, who engaged actively with the Program team. The Bank presented the Program and the ESSA findings, prompting a constructive dialogue in which unions raised questions and shared informed perspectives. Union representatives sought clarification on the scope of training activities. The MEdT confirmed that training will also include new teachers, school principals, and other personnel with leadership roles. Participants expressed interest in the Program’s transparency, accountability mechanisms, and stakeholder engagement approach. They welcomed the inclusion of a grievance mechanism and E&S protections, noting that these contribute to strengthening trust in the process. Responding to a query on availability of human resources, the MEdT explained that it is assessing internal capacity first, supplementing with external hires only if necessary. The Bank team encouraged participants to submit additional comments in writing and emphasized that consultation and dialogue will continue throughout implementation. Overall, the meeting contributed meaningfully to ensuring that union perspectives are integrated into Program design and oversight.

1.3.2 Disclosure of the ESSA Report

17. Before appraisal began, on December 3rd, 2025 the Bank made the draft ESSA Report publicly available at: <https://documents1.worldbank.org/curated/en/099120425100012246/pdf/P511038-e90b6cdb-40ee-4d85-857d-884182974fbf.pdf> and on January 7th, 2026 the Government of Barbados at: <https://change.education.gov.bb/wp-content/uploads/2025/10/BEST-Programme-Draft-Environmental-and-Social-Systems-Assessment-ESSA.docx>. This final version of the ESSA will be disclosed before Board approval.

2. Program description

18. The Program Development Objective (PDO) is to enhance foundational learning and improve access to modern, climate-resilient and inclusive learning environments for children at the pre-primary and primary levels in Barbados.

19. The BEST Program is designed to align with and reinforce the government's first three strategic goals of the 2022-2027 Strategic Plan.

20. The BEST operation will be structured around two results areas, namely: (i) enhanced acquisition of foundational learning, and (ii) improved access to climate-resilient and inclusive education.

- a. **Results Area 1: Enhanced Foundational Learning** focuses on improving literacy and numeracy outcomes for all primary students through the utilization of targeted literacy and numeracy programs, including the integration of EdTech, enhanced teaching practices, and the introduction of formative and large-scale assessments for ongoing monitoring and tailoring teaching to learners' needs. Particular attention will be paid to students who tend to struggle more in the acquisition of these foundational skills, including boys and students with special educational needs. In addition, RA1 supports expanded access to early childhood education for 3- and 4-year-olds as a critical foundation for their school readiness and foundational learning. This RA will incentivize specific interventions within the Strategic Plan's Priority Action Area 5 (Transition to Contemporary, Authentic and Competency-based Forms of Assessment) and Priority Action Area 7 (Provision of High-Quality Academic Support Services and Tools) under Strategic Goal 1 (Enhance overall student learning and achievement outcomes across the national education system), as well as Priority Action Area 9 (Establishment of National Standards for Teacher Development and Professionalization) and Priority Action Area 10 (Developing and Professionalizing Teachers) under Strategic Goal 2 (Enhance teacher quality and development, as well as overall school leadership).
- b. **Results Area 2: Improved Access to Modern, Climate-Resilient, and Inclusive Learning Environments** addresses outdated infrastructure, inadequate resources, and support for students with special education needs by refurbishing primary school facilities to meet modern standards, including by strengthening digital connectivity and incorporating climate-resilient and energy-efficient design features. It also promotes inclusive education through equipping primary schools with assistive technology and specialized furniture, developing individualized learning plans for students with special education needs, and providing teacher training in inclusive pedagogy and classroom adaptation. This RA is aligned with Priority Action Areas 13 (Working on Physical Infrastructural Improvements and Maintenance), 14 (Developing Green and Energy Efficient Facilities), 15 (Modernization and Integration of Technological Infrastructure and ICTs), and 16 (Expanding Access to Technological and ICT-related Resources and Training Support) under Strategic Goal 3 (Improve the physical infrastructure and the technological, digital, and innovative profile of the education system) of the Strategic Plan.

2.1 Results Areas and Disbursement Linked Indicators (DLIs)

21. The following table summarizes the disbursement linked indicators for each Result Area of the BEST Program.

Table 1: Results Areas and Disbursement Linked Indicators

Results Area 1: Enhanced Foundational Learning
DLI 1. Increased share of Class 4 public primary school students achieving above minimum proficiency in literacy
DLI 2. Increased share of Class 4 public primary school students achieving above minimum proficiency in numeracy
DLI 3. Enhanced assessment practices for individual- and system-level learning progress are implemented
DLI 4. Increased score on standardized primary level classroom observations, as measured by standardized protocols
DLI 5. Increased net enrollment rate in public nursery for children aged 3-4 years
Results Area 2: Improved Access to Modern, Climate-Resilient, and Inclusive Learning Environments
DLI 6. Refurbished primary schools are modern, climate-resilient, energy-efficient, and digitally connected
DLI 7. Increased number of primary schools prepared to accommodate students with special educational needs

2.2. Institutional arrangements

22. The BEST Operation will leverage existing implementation arrangements within the MEdT, supplemented by additional support to strengthen implementation capacity. MEdT will be the implementing agency for the Program through the Change Management Unit (CMU) under the supervision of the MEdT Permanent Secretary. Strategic guidance and oversight for the BEST Operation will be provided by the two bodies already engaged in these roles: (i) the multi-sectoral Policy and Oversight Committee (POC) will provide strategic direction for the Program; and (ii) the Inter-departmental Education Transformation Working Committee (IETWC) of MEdT will undertake broad oversight of the Program. The POC is chaired by the Minister of Education Transformation, with the Permanent Secretary of MEdT assuming leadership in the absence of the Minister. The POC comprises, but is not limited to public, private, and civil society sector representatives. The IETWC comprises but is not limited to representatives of Office of the Chief Education Officer, Planning and Development Unit, Strategic Innovation Unit, Schools Unit, Corporate Services Division, and the CMU.

23. Although the MEdT does not have experience with the World Bank Environmental and Social Standards and core principles, it does have experience working with other development partners with similar E&S frameworks. The Inter-American Development Bank (IADB), for example, has been supporting the development of an inclusive education policy, special needs services, screening instruments, capacity building, and assistive technology through the projects “Skills for the future” I and II. For those projects, specific E&S instruments were developed in accordance with IADB regulations, and environmental, social, and occupational health and safety requirements were included in the bidding documents for the works to be carried out under those operations¹. However, it is important to note that these E&S instruments apply exclusively to the projects financed by that entity and, therefore, do not apply to the interventions that will be part of this Program.

24. The MEdT does not have an E&S unit. For infrastructure works the MEdT will also rely on other Ministries (Ministry of Environment and the Ministry of Health and Wellness) for specific responsibilities. While leveraging the expertise of these other agencies is beneficial, it also introduces institutional risks

¹ The IADB-financed Skills for the Future Project was classified as Category C, given that it involved no new construction and was expected to generate minimal environmental or social impacts. Consequently, no dedicated environmental and social specialist was assigned to the project team. The Project Coordination Unit engineer is responsible for safeguards reporting once civil works commence, including contractor compliance with environmental, social, health, and safety (ESHS) provisions.

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since there are other actors apart from the MEdT who have direct responsibility for activities that are central to the Program. This is particularly relevant for the refurbishing works under Results Area 2.

3. Environmental and social effects of the Program

25. Due to its nature and design, the Program is expected to generate predominantly positive impacts. The main social risks are related to potential barriers that may prevent vulnerable groups from accessing the Program's benefits. However, the Program's design itself helps mitigate this risk by incorporating various measures to foster the inclusion of students with disabilities.

26. The primary environmental risks are associated with the refurbishing of school buildings and digital connection. These include potential impacts on physical and cultural resources, as well as risks related to occupational health and safety. In all cases, the impacts are expected to be localized, reversible, and short-term, and, therefore, can be effectively managed.

3.1 Exclusions

27. None of the activities linked to the proposed PforR fall under the policy exclusion definition in Paragraph 14 of the Bank Guidance Program-for-Results Financing: Environmental and Social Systems Assessment. The activities that are "judged to be likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people are not eligible for financing and are excluded from the Program".

28. Nevertheless, the following activities - agreed upon with the Government² - will not be included in the Program:

- a. works that require land acquisition
- b. works within or adjacent to protected areas, marine reserves, coastal buffer zones, or designated ecologically sensitive sites; in areas classified as critical natural habitats under ESS6 (e.g., mangroves, wetlands, turtle nesting beaches)
- c. works in zones prone to coastal erosion, landslides, or flooding, unless robust engineering and climate resilience measures are integrated into the project design
- d. works involving the use of prohibited materials or technologies, such as the use of asbestos-containing materials (e.g., for roofing or insulation), lead-based paints, or hazardous chemicals prohibited under international conventions (e.g., Stockholm, Rotterdam)

3.2 Social benefits

29. The project will generate substantial social benefits by enhancing educational access, quality, and infrastructure across Barbados. These benefits include:

- a. **Improved learning outcomes.** Young children will benefit from expanded access to quality early childhood education. Students in primary schools will benefit from literacy and numeracy programs and formative assessments that support their learning, and the development and implementation of large-scale assessments, that will include measures to support students with disabilities.

² These exclusions are consistent with the Government of Barbados's environmental, social, and climate resilience policies and reflect Barbados's firm commitment to sustainable and responsible national development.

- b. **Teacher and education staff development and training.** Teachers, early childhood educators, and school authorities will receive training to strengthen their professional capacity and improve teaching quality.
- c. **Enhanced school infrastructure.** Communities will benefit from infrastructure improvements such as the conversion underutilized primary classrooms into nursery spaces and refurbishment of selected primary schools. These upgrades will improve the overall education context and make it more resilient to climate-related and other shocks. Universal accessibility, with a focus on students with disabilities, and gender-inclusive design contribute to creating inclusive school infrastructure.
- d. **Community-level impact.** School communities, especially those where infrastructure works are implemented, will experience positive changes. More resilient and better-equipped schools can lead to improved educational outcomes and stronger community engagement.

3.3 Environmental benefits

30. The PforR presents environmental opportunities, particularly through its emphasis on modernization and resilience:

- a. **Energy efficiency gains.** Retrofitting buildings with energy-efficient lighting, cooling systems, and potentially renewable energy (e.g., solar panels) can reduce electricity consumption and greenhouse gas emissions, contributing to Barbados' national climate goals.
- b. **Green building practices.** Rehabilitating schools using environmentally sustainable design and materials can lower lifecycle costs, reduce environmental footprints, and serve as educational models for sustainable practices.
- c. **Climate resilience.** Improvements to physical infrastructure offer opportunities to incorporate climate-resilient design (e.g., stormwater management, wind-resistant roofing, passive cooling), reducing vulnerability to hurricanes, flooding, and heatwaves.
- d. **Improved indoor environmental quality.** Upgrades to ventilation, lighting, and building materials can enhance indoor air quality and comfort, contributing to better health and learning conditions for students and teachers.

3.4 Social risks and mitigation measures

31. While the Program is expected to generate overall a positive social impact in the education sector and communities, it can create negative impacts if appropriate measures are not timely established. Main social risks identified during the preparation of the PforR are:

- a. **Exclusion of some students from the benefits of the Program, especially those belonging to vulnerable groups.** The Program itself, aligned with the Government of Barbados' 2022-2027 Strategic Plan for Education, aims at reaching all students, particularly those facing challenges. Amongst groups that will require special attention to prevent exclusion are the students with disabilities, those from migrant families and lower income households. In terms of infrastructure, access barriers are primarily due to the lack of accessibility identified in some educational facilities. This issue is addressed in the program's design, as both the government's strategy for improving educational infrastructure and the related infrastructure plans must incorporate accessibility for persons with disabilities and gender-sensitive design. Regarding inclusion from a pedagogical perspective, barriers may arise from teachers' insufficient preparation to identify disabilities that affect learning or from the lack of resources needed to provide appropriate support to students with disabilities. The same applies to the teaching materials developed to enhance student

learning, whether digital or printed. If these materials are not suitable, they could constitute a barrier preventing students with disabilities from fully benefiting from the Program. The inclusion of persons with disabilities has advanced significantly in recent years, reflected in the *Rights of Persons with Disabilities Bill (2025)* and the recently updated Inclusive Education Policy. The latter was revised following consultations and is currently under review by the MEdT before being submitted to the Cabinet for approval (expected in early 2026). Once approved, funds from the World Bank Preparation Grant will be used to assist the MEdT with the operationalization and implementation of the Policy. Children from migrant families may encounter barriers to accessing the education system due to the lack of proper documentation, as well as pedagogical and socio-emotional challenges arising from cultural differences and the limited capacity of their families to provide support. These specific circumstances should be considered in parental engagement activities, relevant aspects of curriculum evaluation (if applicable), and in the design of the grievance redress mechanism. Finally, although Barbados' school system guarantees equal access in terms of socioeconomic status and gender, students from lower-income households may still face barriers. These include challenges in maintaining regular attendance due to parents' unstable work conditions, or lack of access to electronic devices and learning materials at home which limits their ability to participate on equal terms with other students. The Barbados Education Strategy explicitly aims to ensure equitable access to education, and this issue is generally addressed across activities, even if not through a dedicated intervention.

- b. **Potential for tension with teachers and the associated reputational risk if appropriate spaces for meaningful engagement are not available to them.** It will be necessary to maintain and strengthen existing participation channels to ensure effective involvement of teachers and to foster positive relationships with unions.
- c. **Concerning interactions with the educational community in infrastructure works, particularly children and teachers, including risks associated to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).** Given that construction activities will take place within school premises - and may coincide with the academic calendar in areas that are either unused or temporarily vacated - there is a risk of inadequate conduct during refurbishment works, including the risk of SEA/SH and inadequate behaviors with minors. To mitigate this, the Program will establish and implement appropriate protocols and codes of conduct that ensure respectful, safe, and transparent relations with all members of the educational community. The Program will also seek to schedule refurbishment works outside of school hours.
- d. **Possibility that inquiries and grievances associated with the program are not adequately received or managed.** Although the MEdT has developed a system for projects financed by other donors, such as the IADB³, it will be necessary to either expand the existing system to an institutional mechanism or establish a new one to ensure effective handling of complaints and inquiries that may arise in the context of the Program.
- e. **Risks associated with the temporary disruption to learning.** Infrastructure works carried out on active school sites may lead to temporary disruptions to teaching and learning or create safety risks for students and staff if not properly phased and supervised. The Program will also seek to schedule

³ The Grievance Redress Mechanism (GRM) developed under the Inter-American Development Bank-financed Skills for the Future Project provides the framework currently used by the MEdT to manage stakeholder inquiries and complaints. The system operates at two levels: contractors receive, document, and address grievances related to on-site activities, while the Project Execution Unit monitors compliance, ensures resolution, and maintains a grievance registry. The GRM procedures are communicated to affected communities through the project's stakeholder engagement and communication plan, including digital channels and printed materials. This mechanism can be adapted or expanded into an institutional GRM for the BEST Program to ensure consistent and transparent management of feedback and complaints.

refurbishment works outside of school hours and coordinate with school authorities to reduce the possibility of disruptions to learning.

- f. **Risks associated with labor and working conditions.** Construction activities may involve small-scale contractors and laborers who require oversight to ensure fair wages, compliance with labor laws, and access to grievance mechanisms. Labor conditions and Environmental, Social, Health and Safety (ESHS) requirements will be integrated into bidding documents and contracts and will be monitored during implementation of works.

32. The Program will not build schools that require land acquisition or involve any social or economic impacts associated with land acquisition – such impacts are explicitly stated in the exclusion list (please refer to 3.1. for more detail), which will be part of the criteria to select infrastructure interventions.

3.5 Environmental risks and mitigation measures

33. Most of the environmental risks are related to DLI6. Rehabilitation and improvement of school buildings may likely generate limited adverse effects on physical and cultural resources and risks to the community and workers' safety. Since the schools scheduled for refurbishment works have not yet been confirmed, it is possible that some older buildings may have historical value or constitute cultural heritage. In such cases, appropriate precautions should be taken to ensure their protection during construction, including measures to address any chance findings related to the building's history. These civil refurbishment works will be limited in number and located in areas that have already been developed and, hence, their effects will be short-term, localized and reversible and can be easily addressed through standard mitigation measures and good international industry practice (GIIP). These localized risks will be considered in the context of climate change challenges faced by Barbados.

34. More specifically, anticipated environmental risks include:

- a. **Construction and demolition waste.** Rehabilitation works will generate solid waste, including concrete, metal, packaging, and potentially hazardous materials (e.g., old paint, fluorescent lights). Effective waste management plans will be required.
- b. **Dust, noise, and air emissions.** Localized dust generation, construction noise, and emissions from machinery may temporarily affect school communities and nearby residents during the construction phase.
- c. **Occupational health and safety risks.** Construction workers will be exposed to standard risks such as work at heights, electrical hazards, and manual handling. If not properly managed, these could also pose risks to students, school staff and visitors to the school compounds.
- d. **Legacy environmental hazards.** Older school buildings may contain hazardous materials, such as asbestos-containing materials, lead-based paint, or mold. A screening protocol will be necessary to identify and manage such risks safely.
- e. **Resource consumption.** Construction activities will involve the use of water, electricity, and raw materials. Without efficient planning, this could increase environmental footprints in the short term.
- f. **Environmental oversight capacity.** The MEdT may have limited experience managing environmental risks in civil works, highlighting the need for institutional strengthening and support from relevant regulatory bodies.

- g. **Natural physical resources.** Mature shade trees within schoolyards, drainage features and natural stormwater channels, and small green areas or biodiversity pockets used by school communities may be inadvertently affected during demolition, excavation, or movement of materials.

4. Description of national systems

35. Barbados’ legal framework encompasses a range of regulations applicable to various aspects of the Program. The Constitution of Barbados, which was last amended in 2022, outlines the fundamental legal framework of the country, including governance, citizens' rights, and the structure of the state.

36. Annex 1 includes a table with the general legal framework applicable to the Program. These regulations address key areas such as education, social inclusion, infrastructure, occupational health and safety, sexual harassment and abuse, environmental management, and stakeholder consultation and participation. It also includes a second table with conventions and international treaties to which Barbados is a signatory.

37. The table below assesses the capacity of E&S systems of Barbados to effectively manage the identified E&S risks. It assesses the issues addressed in the legal framework and gaps per identified risk.

Table 2: Issues addressed by legal framework and gaps per identified risk

Risk	Issues Regulated by National Law	Missing Aspects/ Gaps	Comments
Exclusion of persons with disabilities	The rights of persons with disabilities are recognized through the Rights of Persons with Disabilities Bill and the Inclusive Education Policy that is being developed.	Existing regulations acknowledge these rights, and the upcoming bill and policy will further reinforce them.	MEdT Strategies and programs explicitly address the rights of students with disabilities.
Exclusion of migrant students	The rights of migrants are generally recognized.	Migrants lacking proper documentation may face barriers in accessing education.	
Lack of adequate gender inclusion	The legal framework provides adequate protection.	Implementing the activities requires a proactive approach to gender inclusion across all program components, including infrastructure and learning activities.	Integrate a gender component in all Program training. ⁴
Conflict with teachers	The Barbados Constitution guarantees freedom of association. Specific regulations establishing teachers' unions empower them to advise members and advocate for education improvements.		Stakeholder engagement with teachers is being implemented. It will continue and be strengthened under Program.

⁴The Office of Gender Affairs suggested a gender component in all Program training. For example, if a workshop is conducted on incorporating multimedia in classrooms, consider using images of boys and girls that dispel stereotypical / harmful gender roles. The Office also proposed: (i) any prospective research should include sex disaggregated data – specific data collection methods may be needed to capture the unique experiences of boys, girls, indigent children and children with disabilities, particularly with respect to classroom engagement and correspondent learning outcomes; (ii) efforts should be undertaken to dismantle structural barriers to gender equality by redressing disparities in access and content (curricula); (iii) facilitate a gender-sensitive curricula; (iv) equitable outcomes should be prioritized in addition to providing equitable opportunities; (v) aim to promote gender parity in educational achievement / learner outcomes; and, (vi) consideration should be afforded to conducting an analysis of socio-cultural relations relative to gender equality in education. Proposals set forth by the Office of Gender Affairs should be assessed by the MEdT and integrated, as relevant and possible.

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Risk	Issues Regulated by National Law	Missing Aspects/ Gaps	Comments
SEA/SH associated risks	Barbados' legal framework includes various provisions to protect individuals from sexual harassment and abuse. Some regulations target specific groups, such as children, and there are also laws addressing SEA/SH in the workplace, such as the Sexual Harassment in Employment (Prevention) Act, 2017-21	Additional measures will be required to operationalize these regulations: establishing the obligation for contractors to have a code of conduct ⁵ , the grievance mechanism should be able to address SEA/SH complaints, undertake awareness training, etc.	
Risk of inquiries and grievances associated with the Program not being adequately received or managed		Barbados lacks a specific access to information procedures and a system to respond to stakeholder grievances/feedback.	Several public agencies in Barbados offer customer service. The MEdT already has a grievance mechanism in place for an IADB-financed program, indicating that the current legal framework supports such mechanisms, but an institutional grievance approach will be required.
Temporary Disruption to Learning	The current legal framework protects instructional time.		Previous MEdT infrastructure projects conducted works during weekends/ holidays to minimize disruption. This experience should be applied to the current Program.

⁵ Under the IADB-financed Skills for the Future Project, contractors were required to adopt and enforce a Code of Conduct that included specific provisions on SEA/SH. Although this requirement is not yet systematically embedded across all of the Ministry's construction contracts, its application in previous donor-supported projects has provided the Ministry with experience in implementing and monitoring compliance with Codes of Conduct with SEA/SH provisions.

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Risk	Issues Regulated by National Law	Missing Aspects/ Gaps	Comments
Risks associated with labor and working conditions, including occupational health and safety (OHS) risks	<p>Barbados’ law includes protecting working conditions:</p> <ul style="list-style-type: none"> - Safety and Health at Work Act (2005, amended 2022) + subsidiary regs (incl. Workplace (Noise) Regs 2007): Obligations for safe work zones affecting both workers and the public (barriers, demarcation, Personal Protective Equipment, method statements, risk assessments). - Road Traffic Act (Cap. 295): Traffic Management Plans, permits, signage/ barriers/ flagging for work in/along roads to protect workers and the public. - Accidents and Occupational Diseases (Notification) Act (1983): Mandatory reporting of workplace accidents/ occupational diseases. 	<p>MEdT should ensure they include construction OHS procedures, work-zone traffic control details, and community protection measures in the bidding documents for the works under the Program.⁶</p> <p>There is no evidence of standardized contractor training/orientation requirements and field inspection checklists applicable to small works.</p>	
Institutional risks due to the coordination of works supervision and maintenance	The legal framework defines the responsibilities of each government agency.		MEdT has worked with government entities on similar projects thus helping to mitigate risks in the current program.

⁶ Standard bidding documents developed under the IADB-financed Skills for the Future Project include ESHS specifications, covering contractor OHS procedures, waste management, and community protection measures. While these templates are not yet formally adopted across all MEdT programs, they can be used or adapted for the preparation of bidding documents under the BEST Program.

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Risk	Issues Regulated by National Law	Missing Aspects/ Gaps	Comments
Risks associated with management of construction and demolition waste	<ul style="list-style-type: none"> - Sanitation Service Authority Act (1974): provides for solid waste collection, transport, and disposal by the Sanitation Service Authority. - Health Services (Collection and Disposal of Refuse) regulations, 1975: set rules for storage, collection, and safe disposal; prohibits random dumping. - Health Services (Disposal of Offensive Matter) Regulations, 1969: controls handling and disposal of offensive waste. - Environment Protection Act, 1997: general authority to prevent pollution and require proper waste handling. - Planning and Development Act (2019, as amended 2020) & Environmental Impact Assessment (EIA) Regulations (2021): authorities may impose conditions on waste management. 	MEdT standard E&S bidding documents were not available for review. MEdT should ensure they include requirements for segregation, labeling, temporary staging, collection schedules, and record-keeping (e.g., delivery notes/ manifests).	
Dust, noise, and air emissions	<ul style="list-style-type: none"> - Environment Protection Act (1997): basis to control pollution and require measures that prevent sediment- or waste-laden discharges. - Health Services Act (1969) and related regulations (Nuisances; Building; Disposal of Offensive Matter): authority to prevent/abate unsanitary discharges, manage offensive matter, and address blocked or fouled drains. - Sanitation Service Authority Act (1974): mandates proper collection /transport/ disposal of wastes through the Sanitation Service Authority. 	MEdT standard E&S bidding documents were not available for review. MEdT should ensure they include requirements for routine dust suppression (for example, wetting and covered stockpiles), noise management (working hours, equipment mufflers), or vibration controls (near fragile structures); as well as procedures to adjust work hours/methods and provide advance notices to the school community (in the case of retrofit), as well as nearby health facilities or dense residential areas.	

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Risk	Issues Regulated by National Law	Missing Aspects/ Gaps	Comments
Legacy environmental hazards	Addressed in Barbados' legal framework, including the Environment Protection Act (1997) which requires pollution control and safe handling of hazardous materials, applicable to construction waste, oils, or asbestos from old pipes or construction debris.	While Barbados' legal framework provides mechanisms for imposing mitigation measures on environmental liabilities, these are generally activated when projects undergo an Initial Environmental Evaluation (IEE) or EIA. For small-scale interventions - such as those expected under the Program -systematic mitigation is not automatically required unless conditions are imposed by authorities. MEdT should ensure the E&S provisions of the bidding documents include proper mitigation measures to manage detection and management of environmental liabilities.	These gaps require Program-level measures to ensure consistent implementation. Section 5.2 includes actions for: (i) integrating GIIP-aligned requirements into bidding documents; (ii) mandatory contractor training; and (iii) use of standardized inspection checklists and Key Performance Indicators by MEdT.

5. Conclusions and recommendations

5.1 Alignment of National Environmental and Social Systems

38. The assessment of the E&S systems applicable to the Program indicates that Barbados’ legal and regulatory framework is generally aligned with the core principles and planning elements of the PforR Directive. This framework adequately addresses environmental, social, and occupational health and safety considerations. However, certain gaps have been identified, along with opportunities for institutional strengthening.

39. Where national legislation does not fully address the requirements of the core principles, the Program will promote adherence to GIIP through its bidding documents and operational procedures.

40. The following section presents an analysis of how these principles are currently addressed, outlines the identified gaps, and proposes corresponding measures for improvement.

Table 3. Alignment, gaps and recommendations.

ALIGNMENT	GAPS	RECOMMENDATIONS
Core Principle 1. Program E&S management systems are designed to (a) promote E&S sustainability in the Program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision-making relating to a Program’s E&S effects.		
<p>The program’s systems are aligned, as it seeks to include students in vulnerable groups, like those with disabilities and from low-income households. The activities related to infrastructure and digital equipment, as well as to pedagogical aspects, address the needs of students with disabilities. The regulations prohibiting discrimination based on gender also help ensure access to the Program’s benefits for all teachers involved. Finally, the stakeholder participation activities outlined in the modernization strategy that frames the Program also provide a space to identify any groups that may not have been previously recognized but face barriers to accessing benefits. The legal framework applicable in terms of environmental protection, including waste management, is aligned with the provisions of this principle.</p>	<p>The MEDT does not have its own environmental and social procedures, but E&S instruments have been developed for projects with international financing. The MEDT does not have a grievance mechanism in place that can manage inquiries related to the Program.</p> <p>The MEDT does not have a cadre of E&S specialists to manage E&S risks of the program.</p>	<p>Develop a new grievance mechanism or expand and enhance the current system to be able to manage complaints related to the Program. The Operations Manual must define how the system will function, including available channels, response times, responsible area for the mechanism, possibility of submitting anonymous inquiries and complaints, ways to ensure the mechanism is accessible and culturally appropriate, dissemination of the mechanism, possibility to receive SEA/SH grievances, etc. It must also ensure traceability of complaints and the ability to share a semiannual report of complaints with the Bank.</p> <p>Engage one environmental and social specialist, one stakeholder engagement specialist and a gender specialist to ensure compliance with the E&S aspects addressed in this ESSA.</p>

<p>Core principle 2. Program E&S management systems are designed to avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program. Program activities that involve the significant conversion or degradation of critical natural habitats or critical physical cultural heritage are not eligible for PforR financing.</p>		
<p>Refurbishment works will be limited in scope and confined to areas that have already been developed. Consequently, their impacts are expected to be short-term, localized, and reversible, and can be effectively managed through standard mitigation measures and GIIP included in the national framework.</p>	<p>The MEdT does not currently have its own environmental procedures for these types of activities. However, experience with other international entities demonstrates that MEdT can incorporate specific provisions into its bidding documents to ensure that E&S requirements -including the management of physical cultural resources - are addressed in accordance with the E&S international standards.</p>	<p>Contractors are expected to develop and implement an Environmental and Social Management Plan (C-ESMP) for the construction phase that aligns with the requirements of the financing entity.</p>
<p>Core principle 3. Program E&S management systems are designed to protect public and worker safety against the potential risks associated with (a) the construction and/or operation of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.</p>		
<p>Barbados' occupational health and safety regulations are generally aligned with the requirements of this principle.</p> <p>The Accidents and Occupational Diseases (Notification) Act requires employers to maintain accident records and to report workplace accidents and diseases to the Chief Labor Officer that causes the employee to be away from normal duties for more than 3 days.</p>	<p>No standardized or publicly available procedures specific to small-scale construction in educational facilities were identified. There is no formalized internal guidance for contractors on occupational health, safety, hazardous materials management, or community protection during refurbishment of active school environments.</p>	<p>The Operations Manual shall include the requirement to comply with World Bank reporting requirements if incidents or accidents occur related to Program activities.</p>
<p>Core principle 4. Program E&S systems manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards.</p>		
<p>Not applicable. The Program will not finance any works that may require the acquisition and/or taking of land resulting in displacement, i.e. loss of housing, assets, access to assets, income sources, or means of livelihood, whether or not the affected persons need to relocate.</p>	<p>N/A</p>	<p>N/A</p>

Core Principle 5. Program E&S systems give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to the needs or concerns of vulnerable groups		
<p>Not applicable. Considerations about indigenous peoples are not applicable in Barbados. Exclusion risk regarding other vulnerable groups are assessed under Core Principle 1.</p>		
Core Principle 6: Program E&S systems avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes		
<p>The Program may contribute to exacerbating labor conflicts by affecting teachers' through curriculum changes, updates in training, and improvements in available resources. Though these changes aim to achieve various improvements in the educational system, in practice, they will directly impact teachers' work and may lead to conflicts if early participation is not allowed. This participation is essential to properly consider feedback and incorporate needed adjustments in the activities. Barbados has an adequate regulatory and institutional framework to support such participation as well as guaranteeing the right to unionize. Teachers' unions have a history of involvement in educational system discussions. MEdT's proposed education modernization strategy includes the need for participation from teachers, school administrators, and families. The consultation process for <i>Reimagining Education in Barbados</i> included teacher unions and associations of school administrators. Thus, the systems are suitable for managing the risk of conflict.</p>	<p>Participation strategies recently implemented by the MEdT were developed within the framework of other internationally funded projects, following the guidelines included in the E&S instruments of those projects. However, these procedures are not incorporated as part of the MEdT's general stakeholder engagement practices thus far.</p>	<p>Ensure that appropriate procedures are in place to create participation opportunities for each activity of the Program. The Program shall develop and implement a procedure for stakeholder participation that ensures meaningful and reasonable participation opportunities for the various Program activities that require it. This procedure must ensure that these opportunities are culturally appropriate and scheduled in a way that allows their outcomes to be considered in the different project activities.</p>

5.2. Environmental and Social actions for the Program Action Plan

41. Table 4 below integrates key actions agreed with the Government of Barbados for Program implementation including description, responsibilities, timing and indicators to confirm compliance.

Table 4. Environmental and Social Activities for the Program Action Plan

	Action Description	Source	Responsibility	Timing	Timing	Completion Measurement
1	Develop an institutional grievance mechanism that can be available to stakeholders to submit hindrances and grievances related to the implementation of the Program.	ESSA	MEdT	Other	3 months after effectiveness	<p>The Ministry wide Grievance Mechanism to manage hindrances and complaints related to the Program is publicly available, with different channels to submit grievances without cost and with the possibility of anonymous channels. The Operations Manual must define how the system will function, including available channels, response times, responsible area for the mechanism, possibility of submitting anonymous inquiries and complaints, ways to ensure the mechanism is accessible and culturally appropriate, dissemination of the mechanism and possibility to receive and respond to SEA/SH grievances.</p> <p>The MEdT has designated a person responsible for managing the grievance mechanism and reporting to the Bank semi-annually.</p>
2	Strengthen the E&S capacity of the MEdT by engaging professionals to focus on E&S risk management, gender inclusion and adequate stakeholder engagement during the implementation of the Program. Provide capacity building to MEdT staff.	ESSA	MEdT	Other	3 months after effectiveness	<p>One environmental and social specialist, one gender specialist and one stakeholder engagement specialist are engaged (hired or assigned to the implementation of the Program) and have the skills required for the position based on the Terms of Reference agreed with the Bank.</p> <p>The MEdT will develop and deliver training for the new specialists, and for relevant technical and procurement staff, covering as a minimum GIIP for school rehabilitation, screening, oversight, contractor supervision, review of C-ESMPs and SEA/SH protocols.</p>

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	Action Description	Source	Responsibility	Timing	Timing	Completion Measurement
3	Develop and implement a strategy to adequately engage with key stakeholders throughout Program execution.	ESSA	MEdT	other	3 months after effectiveness	Stakeholder engagement strategy that clearly identifies how MEdT will engage with the different types of stakeholders, when and means of interaction as well as how MEdT will integrate feedback received into the implementation of the Program is developed and agreed with the Bank. Strategy updated as needed. The Bank receives report on strategy implementation every six months.
4	Develop and agree with the Bank a screening checklist to identify environmental risks as well as E&S requirements to be included in the Program’s bidding and contracting documents with contractors and supervising engineers.	ESSA	MEdT	other	3 months after effectiveness or/and before any tender is launched.	<p>Environmental screening checklist developed, agreed with the Bank, included in the Operations Manual, and applied to all schools considered for refurbishment. The checklist will identify: (i) hazardous materials (asbestos, lead paint, mold), (ii) physical and cultural resources (heritage features, plaques, murals), (iii) natural physical resources (mature trees, stormwater channels, green areas), and (iv) site constraints related to community safety. Screenings are filed in MEdT records.</p> <p>Environmental and social requirements developed by MEdT, agreed with the Bank and integrated in all bidding and contracting documents for the Program's infrastructure works. Bidding documents should also require the development and submission to the MEdT of Management Strategies and Implementation Plans or a Contractor Environmental and Social Management Plan.</p>

Annex 1. Barbados legal framework applicable to the Program

Law/Decree	Observation
Education	
Education Act, ⁷ Chapter 41 1983. Last amended 2002	Defines responsibilities of the Minister of Legal Affairs in education policy and implementation. Covers public and private school management, financial assistance, and advisory commissions.
Education Regulations	
Public Service (Teachers) Order, 2016	Regulates positions and salaries of teachers across various educational institutions.
Public Service Act, Cap 29	Law relating to the administration of the public service for the purpose of achieving greater efficiency and effectiveness in the management of the service (including the teaching service)
Public Service (Qualifications) Order, 2016	Law setting the qualification requirements of teachers (and other offices)
Land	
Land Acquisition Act, Chapter 228 1949, Last amended 1994	Regulates compulsory acquisition of land by the Crown for public purposes.
Land Registration Act, Chapter 229 (Last amended 2002)	Establishes land title registration system and regulates land transactions.
Sexual Exploitation and Abuse and Sexual Harassment	
International Conventions	Barbados ratified CEDAW and Inter-American Convention on Violence Against Women.
Domestic Violence (Amendment) Act, 2016-2	Covers various forms of abuse including child, emotional, financial, physical, and sexual.
Sexual Offences Act, Chapter 154	Recognizes a wide range of offenses and includes protections for vulnerable individuals.
Sexual Harassment in Employment (Prevention) Act, 2017-21	Protects employees from workplace sexual harassment and outlines complaint procedures.
Ratification of International Labour Organization (ILO) Recommendation No. 206 (2019)	Encourages addressing workplace violence and harassment through various legal frameworks.
Gender Equality	
Prevention of Discrimination Act, 2020	Prohibits employment discrimination and grants equal rights to men and women.
Prevention of Discrimination Act, 2020	Protects individuals from employment discrimination based on sex or sexual orientation.
Infrastructure	
Public Works Act, Chapter 32	Regulates provision and maintenance of public works and infrastructure.
Environmental, Social, Health and Safety (ESHS)	

⁷ MEdT informed that the Education Act is currently being reviewed and under reform.

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Law/Decree	Observation
Safety and Health at Work Act (SHAW) (2005)	<ul style="list-style-type: none"> - Employer duties: safe environment, Personal Protective Equipment (PPE), safe systems - Employee duties: care and cooperation - Emission control from workplace activities - Mandatory safety planning - Risk assessments - Emission control on construction sites
Supplementary Workplace Regulations (2007)	<ul style="list-style-type: none"> - Specific rules on sanitation, PPE, noise, water, etc. <p>Must be integrated into site design and worker welfare facilities</p>
Accidents and Occupational Diseases (Notification) Act (1983)	<ul style="list-style-type: none"> - Mandatory reporting of workplace accidents and diseases - Required for all public works to report incidents
Environmental Protection	
Environment Protection Act (1997)	Regulates pollutant discharge into air, land, water Requires EIAs and pollution control in infrastructure projects
Waste management	
Sanitation Service Authority Act (1977)	<ul style="list-style-type: none"> - Sanitation Service Authority (SSA) handles municipal waste collection and disposal - Sustainable Barbados Recycling Centre (SBRC) processes and recycles waste <p>Construction waste must be properly managed and routed through SSA/SBRC</p>
Rights of Persons with disabilities	
Rights of Persons with Disabilities Bill, 2025 (This Bill was approved by Parliament in January 2025 and is awaiting proclamation by the executive branch)	Recognizes rights of persons with disabilities; promotes and protects full equal enjoyment of rights; eliminates discrimination on the basis of disability; addresses welfare and rehabilitation of persons with disabilities; The law includes a section related to education
Migrant population	
Chapter 190 Immigration Act Last amended 1979	Establishes steps to become a legal immigrant and rights associated with that status, including access to education.

International Legal Framework

Law / Regulation	Observation (Key Provisions – Short)
Convention on the Rights of the Child (CRC, 1989)	Establishes children’s rights to education, safety, non-discrimination, and protection from abuse; reinforces safe, inclusive learning environments.
Convention on the Rights of Persons with Disabilities (CRPD, 2006)	Requires inclusive education, accessibility, reasonable accommodation, and non-discrimination for persons with disabilities.
CEDAW – Convention on the Elimination of All Forms of Discrimination Against Women (1979)	Obligates equal access for women and girls to education, employment, and public services; promotes gender-sensitive teaching and elimination of stereotypes.

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Law / Regulation	Observation (Key Provisions – Short)
Inter-American Convention on Violence Against Women (Belém do Pará, 1994)	Calls for prevention and response to all forms of violence, including SEA/SH; supports Codes of Conduct and safe reporting channels.
ILO Convention 155 – Occupational Safety and Health (1981)	Requires safe working conditions, accident prevention, and training; applicable to contractors rehabilitating schools.
ILO Convention 187 – Promotional Framework for Occupational Safety and Health (OSH) (2006)	Promotes continuous improvement of national OSH systems and preventive approaches to workplace safety.
ILO Convention 100 – Equal Remuneration (1951)	Requires equal pay for equal work regardless of gender.
ILO Convention 111 – Non-Discrimination in Employment (1958)	Prohibits discrimination in hiring and employment on multiple grounds.
ILO Convention 190 – Violence and Harassment (2019)	Establishes protections against workplace violence and harassment, including SEA/SH; requires prevention and grievance mechanisms.
Basel Convention on Hazardous Waste (1989)	Governs safe handling, storage, and disposal of hazardous waste (e.g., fluorescent tubes, electronic waste, asbestos).
Montreal Protocol on Ozone-Depleting Substances (1987)	Requires phase-out of Ozone Depleting Substances; relevant to procurement or replacement of school cooling and refrigeration equipment.
UNESCO World Heritage Convention (1972)	Encourages protection of cultural and natural heritage; relevant for schools in historic buildings or near cultural sites.