

**COOPERATIVE REPUBLIC OF GUYANA**

**MINISTRY OF EDUCATION**

**GUYANA EDUCATION SECTOR PROGRAM  
PROJECT - P174244**

**INDIGENOUS PEOPLES PLANNING  
FRAMEWORK**

**May, 2021**

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## Acronyms

EMIS	Education Management Information System
ESF	Environmental and Social Framework
ESP	Education Sector Plan
ESS	Environmental and Social Safeguards
FPIC	Free, Prior and Informed Consent
GSDS	Green State Development Strategy
IDA	International Development Association
IP	Indigenous People
IPPF	Indigenous Peoples Planning Framework
IPP	Indigenous Peoples Plan
IT	Information Technology
LCDS	Low Carbon Development Strategy
MoE	Ministry of Education
NBS	National Bureau of Statistics
NDS	National Development Strategy
NTC	National Toshias Council
OAS	Organisation of American States
PIU	Project Implementation Unit
STEM	Science, Technology, Engineering and Mathematics
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples

## 1.0 Introduction

Guyana's education sector has made remarkable progress in the last 15 years and continues to be a priority for Government investment. The Government of Guyana has prepared a draft Education Sector Plan (ESP) 2020-2024 – Vision 2030. The ESP sets five priorities: (a) Improving governance and accountability; (b) Improving performance at all levels; (c) Improving the efficiency of the education system; (d) Reducing inequities in education; and (e) Contributing to lifelong learning and employability.

The Government, with the support of the International Development Association (IDA) through the World Bank, is currently preparing the Guyana Education Sector Program Project for further enhancement of the education sector and assist in implementation of the ESP. The Project will assist the Government in achieving its goals by focusing on improving learning outcomes at the pre-primary and primary level, supporting management of the system, and targeting vulnerable students to reducing inequities, all of which would increase future economic opportunities for students.

In 2018 the World Bank launched the Environmental and Social Framework (ESF) which enables the Bank and Recipients/Borrowers to better manage environmental and social risks of projects and to improve development outcomes. The ESF offers broad and systematic coverage of environmental and social risks and makes important advances in areas such as transparency, non-discrimination, public participation, and accountability. This is achieved through the implementation of ten (10) Environmental and Social Standards (ESS) which constitute the ESF, and which set out the requirements that apply to projects funded by the Bank.

ESS7 focuses on Indigenous Peoples. During the environmental and social screening of the Guyana Education Sector Plan Implementation Grant this standard was deemed to be relevant to the Project since, although the project will be implemented nationwide, the activities proposed under Component 1 target students in the Nursery levels 1 and 2 located in Administrative Regions where Indigenous Peoples presence is significant (Administrative Regions 1, 7, 8 and 9). As a result, the following actions were recommended:

- i. Prior to appraisal, prepare an Indigenous Peoples Planning Framework (IPPF) in scope and scale proportionate to the scope and scale of the project activities proposed under Component 1. A main focus of the IPPF will be the extra care that will be taken for designing and implementing the activities financed (training, textbooks) acknowledging and reflecting the cultural identities of the different Indigenous communities involved.
- ii. During project implementation, prepare an Indigenous Peoples Plan (IPP), also in scope and scale proportionate to the scope and scale of the project activities under Component 1, as part of the specialized consultant services for the development of the training and textbooks adaptation to be financed during the project implementation.

This IPPF was prepared as was recommended. The IPPF is to establish the requirements of ESS7. It presents the relevant baseline information, describes the policy, regulatory and institutional framework, identifies the potential impact of the Project on the Indigenous population, outlines the process for preparation of the IPP, identifies the areas to be addressed by the IPP, and presents the organizational arrangements for ensuring compliance with the IPPF and subsequently the IPP. The IPP is expected to be prepared and implemented during Project implementation, prior to the commencement of activities involving the Indigenous population.

## 2.0 Project Description<sup>1</sup>

### 2.1 Overview

The Guyana Education Sector Plan Implementation Grant is to be implemented by the Ministry of Education (MoE) with funding provided by the IDA through the World Bank. The project is estimated to cost US\$7 million and will be implemented over a 3-year period, commencing in 2021.

The Project aligns with the national ESP. Specifically, Component 1 of the Project, is aligned with Program 2.1 of the ESP which is: To ensure children at nursery level demonstrate mastery skills in various competencies. The program supports two of the three main ESP strategies, namely: 1. Institute school readiness programs focused on learning and parental attitudes and involvement, and 2. Institute a compulsory continuous professional program for all nursery teachers. In addition, Component 1 is aligned with Program 4.1: To ensure equitable distribution of education resources and delivery across education districts, with specific emphasis on hinterland/riverine areas. By focusing components of the grant on the hinterland and riverine areas the program contributes to the core objective of reducing inequalities between regions. Component 2 is aligned with Program 2.2: To ensure learners at the end of primary demonstrate functional numeracy and literacy skills. The ESP emphasizes technology-assisted learning as an identified alternative to improve the quality of education; as well as Program 2.3: To ensure STEM is embedded into the primary teaching-learning process. Technology assisted learning is highlighted in the ESP as a key component to improve the national approach to science and math education. Finally, component 3 is aligned directly with program 1.1: To strengthen resource development, management and accountability at central, regional and school levels, in particular through the establishment of an integrated education management information system.

### 2.2 Project Development Objective

The objectives of the Project are to:

- (i) improve learning conditions at the Nursery level in select areas;
- (ii) increase access to technology-assisted learning at the Primary level in select areas, and
- (iii) improve functionality of the education management information system nationally.

### 2.3 Project Components

The proposed Project would support the Government's efforts to address longer-term structural constraints in early childhood level, primary education and education sector management, while also supporting continuity of learning and learning recovery in the short and medium term. The Project would achieve its development objective through the implementation of three components:

**Component 1: Improving Learning Conditions at the Nursery level** - This component aims to improve teaching and learning conditions in both schools and homes to increase longer-term school readiness. This will be achieved through three subcomponents: teacher training at the Nursery level to improve pedagogy and delivery of the new curriculum, provision of accompanying materials to support learning, and parental education to support home-based learning.

- **Subcomponent 1.1: Teacher training to accompany the new curriculum** - This subcomponent would

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<sup>1</sup> This section was prepared using information from the Project Appraisal Document

support the delivery of the reformed curriculum, to be piloted starting in September 2021, through training of all teachers and school leaders in Nursery 1 and 2. The training will include foundational skills, as well as student-centered pedagogy and formative assessment. The component would also provide follow-up mentorship and classroom observation using the open source TEACH<sup>2</sup> Early Childhood Development tool. Training will take place in person or online, to be determined and adapted as the public health situation unfolds. Digital options for administering TEACH will be explored accordingly. The content would be delivered to hinterland teachers without internet access through regional hubs and by CD-ROM or other methods provided by traveling inspectors. Socio-emotional aspects will be included in the training, of particular importance during the current pandemic, which can take a toll on students, parents, and teachers. The activities would contribute to the successful transition for students from Nursery to Primary, as the curriculum has been designed to flow from one to the other, and the training provided to teachers at the primary level (under the Guyana Secondary Education Improvement Project) will be consistent with the training provided in this subcomponent. The subcomponent would finance training activities, including consultants, master trainers and logistical support as needed.

- **Subcomponent 1.2: Learning materials.** To support the rollout of the curriculum at the early childhood level, this subcomponent would finance accompanying learning materials for Regions 1, 7, 8, 9 at the Nursery level 1 and 2. The subcomponent would finance the acquisition and adaptation of textbooks and other materials for age appropriate play-based learning. The volume of materials will be revised on the basis of the costing as the Project is prepared. Should schools remain closed due to the pandemic, materials will be delivered to the homes of students to support parental instruction and distance learning provided by television/radio and online formats (delivered by the MOE).
- **Subcomponent 1.3: Primary caregiver education.** This subcomponent would support the provision of primary caregiver education through “parenting circles” in Regions 1 and 7, building on a previous pilot. A training program will be designed and implemented to strengthen parenting awareness, knowledge, and skills in support of children’s emerging literacy and numeracy. This activity complements the materials being provided under subcomponent 1.2, as well as home-based learning kits provided under a separate activity.<sup>3</sup> Caregiver engagement is key to ensuring that children’s learning continuity is secured in the medium and long term, in connection with or in lieu of access to regular schooling. The activity can also reach an additional target group of younger children prior to enrollment in Nursery. Parental engagement can take various formats, through in-person meetings should the context allows it, or through print media, telephone, radio or digital formats. An outreach campaign to parents will be included. The subcomponent would finance provision of training and associated logistical costs.

**Component 2: Promoting Technology-Assisted Learning at the Primary level** - This component aims to increase use of technology at the primary level to supplement teaching and support student learning in foundational skills in mathematics and literacy. This component has two subcomponents: implementation

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<sup>2</sup> TEACH is a free classroom observation tool was designed by the World Bank to help countries track and improve teaching quality. Teach is currently employed at the Primary level in Guyana.

<https://www.worldbank.org/en/topic/education/brief/teach-helping-countries-track-and-improve-teaching-quality>

<sup>3</sup> Through the Early Learning Partnership, the Bank is supporting the production of interactive lessons to be aired on radio and television to support learning continuity; the provision of resources to support home based learning; and the development of a tool to assess learning losses when learners return to school, to allow for targeted interventions.

of tablet programs and smart classrooms.

- **Subcomponent 2.1: Tablets to support mathematics and literacy** - This subcomponent would support technology-assisted learning in mathematics and literacy, as critical foundational skills, through the use of tablets in Grade 5. A consultancy will be undertaken to map the new Mathematics and the literacy curriculum, with a specific emphasis on reading, onto a digital platform. Tablets equipped with the software, likely Kolibri, a learning software that provides access to Khan Academy Lite (and other learning platforms), will be provided to primary students in Grade 5 nationally. Master trainers will be trained, who will in turn train Mathematics/Language teachers in each school the use of the tablets and software, both from a pedagogical and technical perspective. The training will be followed up by visits to the classroom to provide hands-on coaching for the teachers to use the tools with the students once school resumes (or digitally, if needed). The design will be adapted to the current context as needed, in particular by providing tablets to students to use at home, exclusively or as part of a hybrid distance/in-person model. The Project will take advantage of the Government's initiative of bringing internet to various remote communities to ensure benefits to the most vulnerable students, but the software on the tablets will also include offline capability to ensure ability to use in areas with low connectivity. This will help ensure continuity of learning whilst out of school, as well as assist with learning recovery to help teachers teach to the right level to make up for learning losses when schools resume. Roving technical teams will be engaged to provide maintenance, and hotlines established to provide support for both teachers and students. In order to improve achievement for both boys and girls, the teacher training will include gender-informed motivational strategies for increasing participation of both girls and boys. To monitor progress in closing achievement gaps, the project will perform pre- and post-tests as part of the tablet program and disaggregate the results by gender.
- **Subcomponent 2.2: Smart classrooms to support learning** - This subcomponent would support technology-assisted learning through select classrooms to be equipped as Smart Classrooms, including smartboards, tablets, and projectors, in schools in both urban and rural areas. Teachers will be trained to utilize this equipment during lessons to supplement their teaching or to provide self-guided options for students. In addition, the smart classrooms would enable long-term remote learning by connecting better-performing, centrally located teachers to classrooms in remote schools ("twinning"), whereby the central teacher can lead a class whilst the local teacher facilitates the lesson. Schools will be selected based on specific criteria, including connectivity, presence of IT personnel and interest of head teachers, as well as need, as determined by test scores, to ensure that vulnerable students benefit. The smart classrooms will also play a key role in the context of COVID-19, as they can be used to support a hybrid distance/in-person model by linking classrooms to students at home. In this manner, the smart classrooms will provide learning continuity as well improved learning once school resumes. The subcomponent would finance provision of hardware, software, and training.

**Component 3: Strengthening Institutional Capacity and Project Management** - The aim of this component is to support the management of the education system through better data and support Project management.

- **Subcomponent 3.1: Scale up of EMIS** - This subcomponent seeks to strengthen the Education Management Information System (EMIS) by scaling up the EMIS to the national level in the nursery, primary and secondary sectors. This would enable the MoE to more efficiently manage education sector data and use information for more effective planning and policymaking, and allow principals to

inform decision making at the school level. The Project would finance procurement of EMIS hardware, including tablets to be provided to schools lacking in computers to allow data uploading by teachers and administrators. The Project will also support investment in software, including development of any additional modules, support to integrating EMIS with learning platforms and other transactional systems, and incorporating reporting tools, allowing aggregation, analysis, and the development of comprehensive dashboards. These can be used, amongst other things, for early warning systems for the prevention of school failure; repetition and early drop out of students, which is particularly important in the context of COVID-19. The subcomponent would also provide training for school leaders, teachers, Regional Education Officers and the central MoE Planning Unit. The training will be aimed at improving the capacity of system users to digitally upload student data at all levels of the educational system, apply homogeneous and efficient criteria for migration, validation and consistency of data in charge of technical personnel from regional units and the central level; and strengthen the capacities to transform the data available in the different platforms and information systems, into information for monitoring, evaluation and decision-making at the school, regional and central levels. Due to the limitations that the absence of internet connectivity could cause in some schools in the country, data collection would be possible offline, and data can be synced periodically once user can access an area with internet. The current aim of the component is to expand the EMIS to schools across all levels in the country. A feasibility study and costing exercise is ongoing and will be concluded during preparation to determine scope appropriateness. The subcomponent will finance training, tablets, software, consulting services, and other costs associated with the rollout.

- **Subcomponent 3.2: Project management, monitoring and evaluation** - This subcomponent would finance project management, monitoring and evaluation, as well as auditing activities.

## 2.4 Implementing Agency

The MoE will be the implementing agency for the Project. The Project would be managed by a Project Implementation Unit (PIU) housed in the MoE Planning Department. The PIU would consist of a Project Coordinator, a Procurement Officer, a Financial Officer, a Finance Assistant, a Monitoring and Evaluation Officer, an Environmental Officer (part time) and a Social Development Officer (full or part time, to be confirmed). The PIU would be responsible for day-to-day management, monitoring, and coordination of implementation, including work planning, procurement, accounting, disbursement, financial management, and other Project-related activities.

## 2.5 Project Beneficiaries

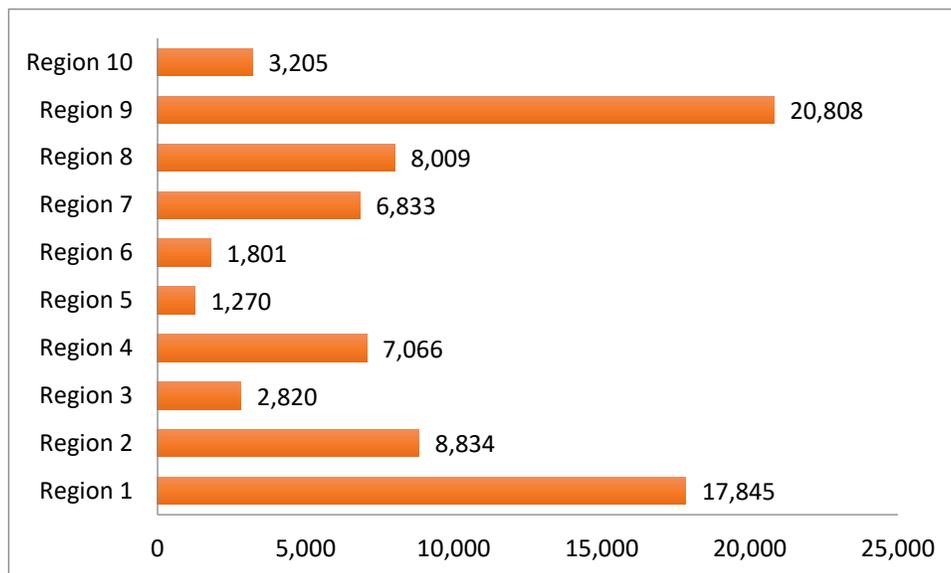
The main beneficiaries of the Project would be the students of nursery, primary, and secondary schools in Guyana. The direct beneficiaries of the first component would be the nursery teachers, students, and parents that receive teacher training, learning materials, and caregiver education. Through its focus on teaching methods targeted to children's individual learning levels, as well as focus on the hinterland, the Project is expected to benefit traditionally disadvantaged students along dimensions of gender, disability, ethnicity and geography. The direct beneficiaries of the second component would be the Grade 5 students who benefit from the tablet and smart classroom initiatives, as well as their teachers, the IT personnel and the school leaders who will be trained through the program. The component will be targeted to ensure beneficiaries include vulnerable populations, through offline ability of tablets and twinning of urban and rural schools. The direct beneficiaries of the third component would be the teachers, principals, and the MoE, including at the Planning Unit as well as the Regional Development Officers, who will be trained and have access to better education data to inform their work.

### 3.0 Overview of Indigenous Peoples in Guyana

The Indigenous Peoples or the Amerindians, as they are collectively referred to, are known historically as the first inhabitants of Guyana. Their history is recorded in their unique culture and heritage that have been passed on through generations using tangible and intangible methods. Guyana’s key symbols of nationhood have originated from the indigenous culture and emphasizes the importance of the Indigenous contribution to Guyana.

#### 3.1 Indigenous Population and Distribution

The history of the Guyanese Indigenous peoples can be traced to 11,000 years ago when the Amerindians hunted, gathered, fished, settled and explored the country. There are nine indigenous nations that remain to this day: Arawaks (Lokonos), Arecunas, Akawaios, Caribs, Macushis, Patomonas, Wai Wais, Wapichan and Warraus. The Warraus, A, and the Caribs are found in coastal Regions 1 and 2; while the Wapichan, the Arecunas, the Makushis, the Wai Wais, the Akawaios, and the Patamonas inhabit the hinterland areas of Regions of 7, 8, and 9. Figure 1 shows the Amerindian Population within each Region.



Source: NBS 2012

**Figure 1: Amerindian Population Distribution with the Regions of Guyana**

There is a total of 212 Amerindian villages and communities. Currently 109 villages have titles to their land. Titled Amerindian lands as of 2020 represent 15.62% of the country land area. Titles for the remaining communities are at various stages of the titling process<sup>4</sup>. The location of Amerindian communities throughout Guyana is shown in Figure 2.

<sup>4</sup> Information provided by the Amerindian Land Titling Project (2020)

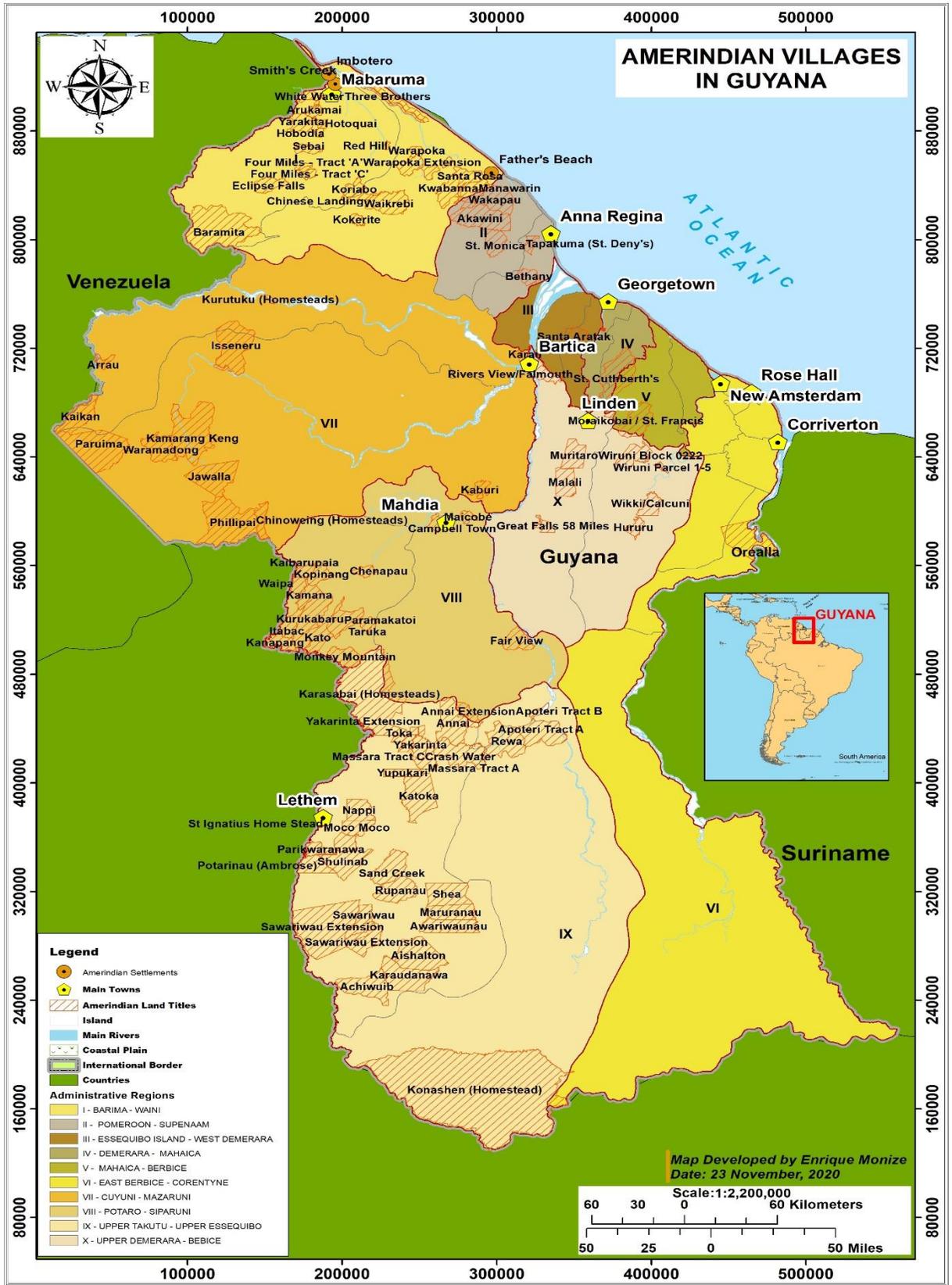


Figure 2: Location of Amerindian Communities throughout Guyana

According to the National Bureau of Statistics (NBS) (2012), the Indigenous population accounts for 78,492 or 10.5% of the total population of Guyana, and is considered the fourth largest ethnic group in Guyana, with a population growth rate of 12.8% between 2002 and 2012. Table 1 shows the population and percentage of the Amerindian population in relation to the other ethnic groups in Guyana.

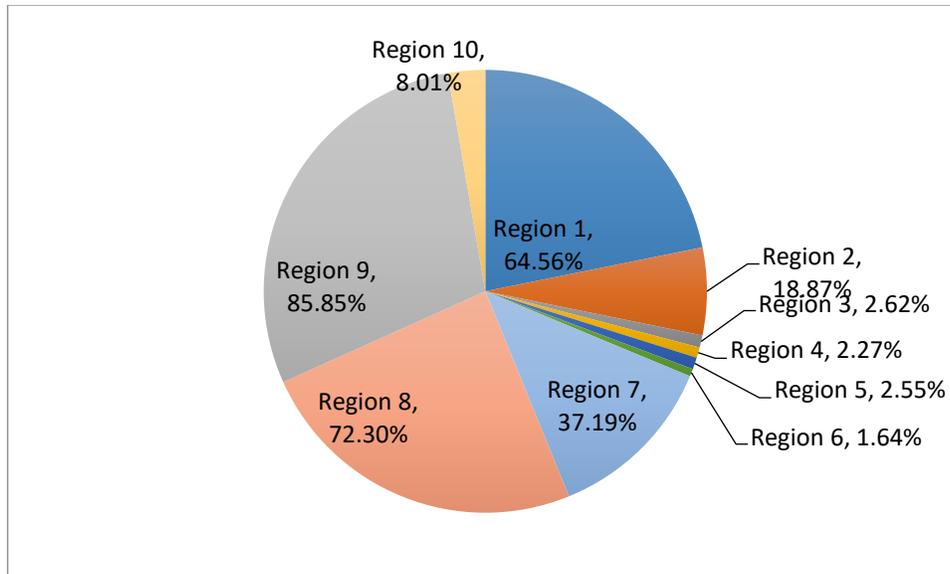
**Table 1: Population and Percentage of Amerindians in Guyana in Relation to other Ethnic Groups between 1980-2012** (Source: NBS 2012)

Ethnicity /Background	Population				Percentage			
	1980	1991	2002	2012	1980	1991	2002	2012
Amerindian	40,234	46,722	68,675	78,492	5.3	6.5	9.1	10.5
African	234,094	233,465	227,062	218,438	30.8	32.3	30.2	29.3
Portuguese	3,011	1,959	1,498	1,910	0.4	0.3	0.2	0.2
Chinese	1,864	1,290	1,296	1,910	0.3	0.2	0.2	0.2
East Indian	394,417	351,939	326,277	297,493	51.9	48.6	43.4	39.8
White	779	308	476	415	0.1	0.04	0.06	0.06
Mixed	84,764	87,881	125,727	148,532	11.2	12.1	16.7	19.9
Other	294	107	112	253	0.04	0.01	0.01	0.03
Total	759,566	723,671	751,223	746,955	100	100	100	100

Further, according to the Guyana 2012 National Census Report, the Amerindians account for 85.9% of the total population in Region 9, 72.3% in Region 8, 37.1% in Region 7, 64.7% in Region 1, and 18.9% in Region 2, as is presented in Table 2. The Amerindian population accounts for an average of 3.4% each of the total population in Regions 3, 4, 5, 6 and 10. The Amerindian population in each Region is shown in Figure 3.

**Table 2: Percentage of Amerindian Distribution by Region** (Source: NBS 2012)

Ethnic Background	Administrative Region										Total
	1	2	3	4	5	6	7	8	9	10	
African	2.30	12.58	21.13	40.56	33.06	21.32	11.62	7.75	1.46	49.02	29.25
Amerindian	64.56	18.87	2.62	2.27	2.55	1.64	37.19	72.30	85.85	8.01	10.51
Chinese	0.05	0.09	0.18	0.24	0.09	0.16	0.14	0.08	0.04	0.32	0.18
East Indian	1.71	44.57	59.55	35.02	54.66	66.03	8.54	2.55	1.04	2.82	39.83
Mixed	31.17	23.60	16.38	21.45	9.51	10.69	40.89	16.59	11.17	39.63	19.88
Portuguese	0.17	0.22	0.08	0.37	0.08	0.07	1.21	0.69	0.30	0.10	0.26
Total	100			100	100	100	100	100	100	100	100



**Figure 3: Percentage of Indigenous Population in the Regions**

### 3.2 Income and Wealth Generation

Historically, the Indigenous Peoples employed a hunter-gather economic model, and the barter system as their main economic activities for the acquisition of basic food supply. However, the diversification of their main economic activities has allowed indigenous communities to commercialise farming, craft, mining, and livestock rearing on a small scale to allow for wealth generation in the rural and hinterland areas (FAO/WB, 2005). More recently, there have been investments in the eco-tourism sectors and protected areas projects within, and concerning the Indigenous communities that are estimated to have a direct impact on the income and wealth generation mechanisms. In 2017, Kanashen was designated a Protected Area under the Protected Areas Act (2011) and is the first community owned Protected Areas System in Guyana. Other projects that have sought to inject monies into the development of Indigenous villages are the GRIF<sup>5</sup> Amerindian Development Fund - which provides direct support to the socio-economic development of Indigenous communities; and the Amerindian Land Titling Project – A UNDP/Government of Guyana project aimed at the titling and demarcation of Amerindian lands.

The Indigenous communities that are located in close proximity to the urban centres have been able to access employment opportunities that exists within those system.

However, there are major challenges to a sustainable approach to their income and wealth generation, such as land use conflict and unregulated natural resource extraction. Other challenges faced by the communities that are located in the hinterland are centred on the lack of, and restricted access to products, infrastructures, and services that would otherwise enable a lower cost of living and increased productivity.

<sup>5</sup> The Guyana REDD+ Investment Fund (GRIF) is a fund for the financing of activities identified under the Government of Guyana Low Carbon Development Strategy (LCDS).

## **4.0 Policy, Legislative and Institutional Framework**

Guyana has implemented several initiatives at the policy and legislative level and has also established the necessary institutional framework to ensure that the rights of Amerindians are protected. The country is also a signatory to international agreements to promote and respect the rights of the Indigenous population. The key initiatives are discussed in this section.

### **4.1 National Policies**

#### **4.1.1 National Development Strategy**

The National Development Strategy (NDS) was launched in 1997 and sets out the primary development policy framework for Guyana. Volume 3, Chapter 22 of the NDS focuses on the Amerindian population and sets out the overarching national policy framework and priorities for Amerindians. The following general objectives were outlined in the NDS as it relates to the Amerindian population:

- The formulation and development of policy, and the design of programmes, must be participatory, inclusive and empowering to Amerindians communities. The strengths of individuals and communities must be advanced over historical and current weaknesses. Action must address needs in ways that ensure the empowerment of these communities and the improvement of their well-being.
- An understanding and appreciation of the complex and delicate social and cultural dimensions of the Amerindian question in Guyana must inform our national development policies. The more contentious and controversial of these dimensions concern the issues of segregation, assimilation, integration, pluralism, self-reliance, self-determination, self-management, ethno-development, ethno-racial respect, and the ownership and control of natural resources.
- Priority also must be assigned to improving the quality of life and the provision of equal opportunity for Amerindians, specifically for women and children, who happen to be the most disadvantaged in these communities.
- Policies must address the inherent inequalities that now exist between hinterland/Amerindian and coastal communities in a manner that, among other things, fosters mutual respect and cooperation.
- The state must understand, accept, and fulfil its obligation to provide basic services and infrastructure to Amerindian/hinterland communities while enabling local institutions to play their essential role in development.

#### **4.1.2 Low Carbon Development Strategy**

In 2009, the Low Carbon Development Strategy (LCDS) was introduced as Guyana's vision for sustainable development with specific consideration for climate change and economic development through international partnerships and collaborations. The LCDS is a long-term development strategy and presents the country's plan for the forest to be protected and maintained in an effort to reduce global carbon emissions while at the same time attracting resources for development through avoided deforestation (REDD+) that would put Guyana onto a low carbon growth path. In 2013, the LCDS was updated to reflect

the progress of the strategy, and to identify new projects areas. Under the LCDS, the Amerindian Development Fund (ADF) was established to provide funding and support to the development of Amerindian communities and settlements. Communities Development Plans (CDPs) were developed and approved by the communities and targeted project areas in agriculture, village infrastructure, tourism and mining.

#### **4.1.3 Green State Development Strategy: Vision 2040**

The Green State Development Strategy (GSDS) is Guyana national development policy on improving quality of life for its citizens by focusing on the green agenda, low carbon economy, and being climate resilience. The GSDS was launched in 2019 and focused on three main aim by 2040: Manage Natural Resource Wealth, Support Economic Resilience, and Build Human Capital. The Strategy recognised the importance of protecting the indigenous rights and resolved to abide by the provisions of the Amerindian Act (2006).

The GSDS proposes the revision of the Amerindian Act 2006 through an inclusive and consensual process based on free, prior and informed consent to address issues of concern to indigenous peoples and bring the Act in line with international obligations. It further states that this review must consider the broad question of rights to all lands, including customary lands, the powers of the minister and large-scale mining on indigenous lands, among other issues.

The GSDS also recognized that Indigenous communities' traditional systems have endured over centuries and their conservation is a priority for maintaining cultures, livelihoods and communities, community health and wellbeing and that traditional indigenous knowledge is valid and contains valued information on preservation and use of Guyana's key natural resources, particularly forests. It also recognizes that the primary responsibility for the preservation and promotion of traditional knowledge and practices lies with indigenous communities and/or their village councils. In that regard, they are to be supported in prioritised preservation efforts regarding traditional lifestyles, land uses and practices, including but not necessarily limited to their traditional forms of medicines, crop farming, food and related products, languages and dialects, art, music, folklore and oral traditions, creative arts and other forms of entertainment. Any research or scientific studies, reporting and/or documentation of knowledge and practices, wherever supported by external institutions or individuals shall be in accordance with indigenous rights of "free, prior and informed consent".

The GSDS also states that traditional knowledge and practices should be considered in the design and delivery of public services and programmes. Public information on government services and programmes should be available in the main indigenous languages. Decision-makers should, however, apply discretion in selecting the languages and dialects of the indigenous nations most suited to the purpose of conveying information in the most satisfactory manner.

## **4.2 Legislation**

### **4.2.1 The Amerindian Act (2006)**

The Amerindian Act provides for the recognition and protection of the collective rights of Amerindian Villages and Communities, mechanisms for good governance within Amerindian Villages and Communities and the granting of land to these Villages and Communities. The Act recognizes the rights of indigenous peoples and communities and provides for participatory governance. The Act supports and encourages

their right to preserve a traditional culture, cultural landscapes and traditional knowledge and languages as a minority group. Further, The Act makes provision for the self-governance and administration of lands that have been demarcated Amerindian territories, and therefore control the land use and planning within the areas. The Act also established the National Tshaos Council (NTC) and Village Councils, which are the main governing bodies, and are concerned with the overall well-being and development of the collective and individual indigenous communities. The Act also provides additional guidelines and procedures for Amerindian communities and its interaction with other industries, as well as stipulates measures of offences and redress.

### **4.3 Institutional Framework**

#### **4.3.1 Ministry of Amerindian Affairs**

The Ministry of Amerindian Affairs is the principal administrator of Government initiatives and projects relating to the Indigenous population within the national framework, and in line with the goals outlined in the national budget. The Ministry is guided by a Minister who represents the interest of the collective indigenous communities in the National Assembly and Cabinet.

#### **4.3.2 National Tshaos Council**

Provisions were made in the Amerindian Act for the establishment of the NTC. The NTC is decision-making and representative body responsible for the collective development of indigenous communities. The Council is made up of Tshaos from each village, and is managed by an executive comprising of one Tshao from each administrative region, and along with ten additional Tshaos. The primary objectives of the NTC are the promotion of good governance with indigenous villages, and further the general well-being of indigenous villages in the formulation of strategies and plans for the reduction of poverty, conservation and other matters concerning natural resources as outlined in the Amerindian Act. The Council may offer advice to the Minister as provided for in the Act.

#### **4.3.3 Village Council**

Village Councils for indigenous communities were provided for under the Amerindian Act where a body comprising of a Tshao and Councillors are elected by members of the village to serve as the village administration. The Village Council is responsible for the good governance and well-being of the community and the promotion of the sustainable use, protection and conservation of village lands and the resources on those lands under the provisions made in the Amerindian Act. The Village Council is responsible for the nomination of members to the NTC.

### **4.4 International Agreements**

#### **4.4.1 The United Nations Declaration on the Rights of Indigenous Peoples UNDRIP (2007)**

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) was adopted by the General Assembly on September 13, 2007. The UNDRIP recognises the rights of Indigenous Peoples and outlines a framework for the implementation of the human rights standards and fundamental freedoms as it relates to indigenous peoples and their specific situation and needs. By adopting this declaration, the Government signaled its commitment to implement measures to safeguard and protect the rights of its

indigenous populations and to uphold the principle of Free Prior and Informed Consent for any form of development which will occur within indigenous lands. Guyana adopted the Declaration in 2007.

#### **4.4.2 American Declaration on the Rights on Indigenous People (2016)**

On June 15, 2016, the Inter-America Commission on Human Rights (IACHR) adopted the American Declaration on the Rights of the Indigenous Peoples between members of the Organisation of American States (OAS) at its third plenary session. Guyana is a member of the OAS. The Declaration outlines the intention to respect and promote the inherent rights of indigenous peoples as it relates to their human rights, gender equality, guarantees against racism, racial discrimination and related intolerance.

#### **4.5 World Bank Environmental and Social Framework (ESF)**

In 2018 the World Bank launched the ESF which enables the Bank and Borrowers to better manage environmental and social risks of projects and to improve development outcomes. The ESF offers broad and systematic coverage of environmental and social risks and makes important advances in areas such as transparency, non-discrimination, public participation, and accountability. This is achieved through the implementation of ten (10) Environmental and Social Standards which constitute the ESF, and which set out the requirements that apply to projects funded by the Bank.

ESS 7 focuses on Indigenous Peoples and ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples. ESS7 is also meant to avoid adverse impacts of projects on Indigenous Peoples, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts. ESS 7 recognizes that Indigenous Peoples have identities and aspirations that are distinct from mainstream groups in national societies and often are disadvantaged by traditional models of development, and that they are inextricably linked to the land on which they live and the natural resources on which they depend. Indigenous Peoples are therefore particularly vulnerable if their land and resources are transformed, encroached upon, or significantly degraded. Projects may also undermine language use, cultural practices, institutional arrangements, and religious or spiritual beliefs.

The objectives of ESS 7 are:

- To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples;
- To avoid adverse impacts of projects on Indigenous Peoples or, when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts;
- To promote sustainable development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate and inclusive;
- To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples affected by a project throughout the project's life cycle;
- To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples as described in ESS 7; and

- To recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples, and to provide them with an opportunity to adapt to changing conditions in a manner and in a time- frame acceptable to them.

This IPPF was prepared to satisfy the requirements under ESS 7, so as to ensure that project activities do not negatively impact Indigenous peoples in regions where the project will be implemented that have significant Indigenous populations.

#### **4.6 National Legislation/Policies and ESS7**

In relation to the proposed project activities, the provisions of the Amerindian Act 2006 allows for adherence to the applicable requirements of ESS 7. The Act provides for Indigenous communities to govern their land and resources and any activity on their land must be permitted by the Village Councils. In addition, while any person conducting any work within a community on behalf of the Government is deemed permitted to enter the community, the Village Council must be informed of the proposed activity. The person is also required to conduct all activities in compliance with the rules of the Village Council.

Although the Amerindian Act does not provide for the need to consult with Indigenous communities in the design of national programmes, this is address through national policies such as the NDS and GSDS.

## 5.0 Potential Impacts on Indigenous Peoples

Activities under Component 1 of the Project can result in some social issues relating to Indigenous peoples since, although the project will be implemented nationwide, the activities proposed under this Component target students located in Administrative Regions where Indigenous Peoples presence is significant (Administrative Regions 1, 7, 8 and 9). These activities are: (i) training of teachers in Nursery 1 and 2, including follow-up mentorship and classroom observation using open source TEACH ECD tool (currently employed at the Primary level); (ii) acquisition and adaptation of textbooks and other materials; and, (iii) support to a training program to be designed and implemented to strengthen parenting awareness, knowledge, and skills in support of children's emerging literacy and numeracy (complementing the acquisition and adaptation of textbooks). Activities under Component 2 can also result in similar issues if schools in these regions are selected to participate. Component 2 focuses on the Primary level, in selected schools and classrooms in both urban and rural areas where the use of digital platforms are suitable, and finances: (i) tablets to support mathematics and literacy and teachers training; and (ii) equipment for select classrooms (smartboards, tablets, and projectors), including teachers training. The schools to be included in this Component have not been selected as yet.

In the four Regions with significant Indigenous population the Amerindians account for 85.9% of the total population in Region 9, 72.3% in Region 8, 37.1% in Region 7, and 64.7% in Region 1.

In Guyana there is no explicit policy that addresses any special education program for children from Indigenous communities. However, the Education Guyana Strategic Plan 2014 – 2018 urged to *“focus on increasing the learning achievements at all levels of education and for all subgroups and decreasing the differences in learning outcomes between the subgroups, especially between the students in coastal and hinterland schools.”* The plan recognizes the accomplishments under the 2008-2013 strategy and prioritizes:

- i. Increase provision of nursery places, especially in remote hinterland regions;
- ii. Improve Literacy and Numeracy learning outcomes at Primary Level;
- iii. Improve sanitary facilities and providing basic utilities such as water and a source of power to hinterland and riverine schools;
- iv. Universal Secondary Education all over the nation; and
- v. Creating Education Television Channel touches all regions including remote hinterland areas.

The implementation of these measures over the years would have served to reduce the gap in the access to educational facilities and materials between coastal and hinterland students.

The project activities will only be limited to training, equipment, and consultants' services, thus no risks linked to land acquisition, or physical and economic displacement are foreseen. The social risks identified at this stage mainly relate to social exclusion risks and exacerbating inequalities between the indigenous and non-indigenous students and caregivers if the cultural adaptation and specific needs of these groups are not taken into account. The social risk of exclusion and inequality in could particularly present itself in:

- i. Inadequate training and textbooks impeding students, in particular indigenous students, from Nursery 1 and 2 to fully benefit from the project support; and

- ii. The risk of having inadequate training impeding the primary caregivers, in particular indigenous caregivers, to fully benefit from the project support.

To avoid any impacts to Indigenous peoples, it is essential that the project activities be tailored to the conditions existing in these regions. These conditions include the limited availability of overall infrastructure and internet services, and the need to adapt the textbooks and training activities to the cultural diversity of the region. It is important to ensure that the activities targeting students of the Nursery levels 1 and 2 in these regions will adopt adequate design and implementation solutions appropriate to the cultural diversity in place. However, the project is expected to build capacity to fulfill this essential requisite only when the consultants with expertise in training and adaptation of textbooks will have been hired and can start their activities. It is expected that the appropriate interaction of these consultants with the stakeholders from across the country, including from Indigenous communities, will provide the basis for designing and implementing the adequate training and adaptation of textbooks.

### **5.1 Social Assessment**

An additional social assessment will need to be conducted as part of the preparation of the IPP. The PIU, through the Social Specialist, should take the lead in conducting the social assessment as part of the IPP preparation process, including engagements with Indigenous communities. Engagements should be done once meaningful technical information on the activities which can impact Indigenous Peoples is available. Consultations with these communities will be essential in the designing and implementing adequate training and adaptation of textbooks. The results of the social assessment will be documented, and that documentation shall be included as part of the IPP.

The social assessment will need to be carried out in an integrated manner with the implementation of Component 1, or updated as applicable, in order to ensure that the assessment will be properly tailored to provide the needed inputs and inform the preparation and implementation of the activities under Component 1 (methodology and content of textbooks and training) targeting nursery students from indigenous communities, in Regions 1, 7, 8 and 9.

### **5.2 Consultation Activities**

When carrying out culturally appropriate meaningful consultations, particular attention should be given to groups within affected indigenous peoples that may be disadvantaged or vulnerable, such as women, youth, the poor, and persons with disabilities, addressing any limitations to enable their participation.

### **5.3 Free, Prior, and Informed Consent (FPIC)**

Indigenous Peoples may be particularly vulnerable to the loss of, alienation from, or exploitation of their land and access to natural and cultural resources. In recognition of this vulnerability, and in addition to the general ESF requirements, ESS7 specifies the need to obtain FPIC if a project were to:

- a) Have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
- b) Cause relocation of Indigenous Peoples from land and natural resources subject to traditional ownership or under customary use or occupation; or
- c) Have significant impacts on Indigenous Peoples' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected Indigenous Peoples' lives.

In the context of this project, neither of those scenarios has been identified, and given the characteristics of the project this is very unlikely to happen during its implementation. However, in the unlikely scenario that this could happen as new information arises during project execution, the PIU will secure FPIC of the affected indigenous peoples in accordance with the provisions of ESS7.

In the potential scenario that FPIC were to be needed, ESS7 indicates that the identification of appropriate representatives of the indigenous peoples is a key part of the process to establish FPIC. These are the individuals who are considered by the majority of the affected people to be the legitimate authorities to make decisions on collective support on their behalf. The representatives may be chosen through a process that is culturally appropriate to the respective indigenous groups, such as through referendum or an assembly format, or they may be tribal chiefs or a council of elders, among others.

In such cases, particular attention should be given to groups within affected indigenous peoples that may be disadvantaged or vulnerable, such as women, youth, the poor, and persons with disabilities. Addressing any limitations on their participation, to ensure that their interests and concerns are adequately considered and addressed as part of the process to establish FPIC.

Good faith negotiation involves:

- a) Willingness of the parties to engage in a process and availability to meet at reasonable times and frequency;
- b) Sharing of information necessary for informed negotiation;
- c) Use of mutually acceptable procedures for negotiation;
- d) Willingness to change initial positions and modify offers where possible; and
- e) Provision of sufficient time for the process.

Achieving FPIC requires paying attention to, and documenting, both process and outcome. This establishes a record of agreements reached, as well as dissenting views. Where there is disagreement on what constitutes an appropriate engagement process, or an agreement cannot be reached, the Borrower will seek advice from an independent specialist. However, FPIC may be achieved even when individuals or groups within or among the affected indigenous peoples explicitly disagree.

## **6.0 Indigenous Peoples Plan**

While the project will not result in adverse impacts to Indigenous peoples an IPP is required to be prepared and implemented to ensure the necessary measures are taken to allow for the Indigenous population to adequately benefit from project activities. The IPP is to be prepared during Project implementation and should be prepared as soon as meaningful technical information on the activities affecting Indigenous peoples is available, and prior to the conduct of any project related activities involving Indigenous peoples. The IPP is to be prepared based on a scope and scale proportionate to the scope and scale of the project activities under Component 1, as part of the specialized consultant services for the development of the training and textbooks adaptation to be financed during the project implementation. Project activities that may affect Indigenous peoples will not commence until the IPP is finalized and approved.

### **6.1 IPP Preparation Process**

The PIU will be responsible for organising the preparation of the IPP. Once meaningful technical information on the activities affecting Indigenous peoples is available the preparation of the IPP should commence. A social assessment which builds on the assessment presented in the IPPF will be conducted as part of the preparation of the IPP. The assessment should be based on meaningful consultation tailored to the Indigenous population, and should identify the potential risks and positive impacts of the Project on this group. Critical to the determination of potential risks to this group is their lack of access to opportunities relative to other social groups. The assessment should also identify and evaluate measures necessary to avoid risks, and to ensure that the Indigenous population receive culturally appropriate benefits under the project. Stakeholders who should be consulted during this process includes representatives of nursery education level teachers, parents and students from Regions 1, 7, 8 and 9; Toshaos and other village-level leaders; National Toshaos Council, District Education Officers (DEOs) and Regional Education Officers (REOs) of Regions 1, 7, 8 and 9, and Ministry of Amerindian Affairs.

The measures required for the implementation of the IPP should then be determined, including implementation schedule, roles and responsibilities, and cost estimates. Mechanisms to monitor, evaluate and report on the IPP implementation should also be determined.

The most appropriate measures to engage with stakeholders during Project implementation should also be defined in greater detail during the preparation of the IPP. This will be done in consultations with Indigenous people groups and should incorporate the stakeholders' engagement measures outlined in the Environmental and Social Commitment Plan. Participants of the consultations will include the Ministry of Amerindian Affairs, the National Toshaos Council, indigenous peoples' organizations such as Amerindian Peoples Association, Guyana Organisation of Indigenous People and The Amerindian Action Movement of Guyana, and Village Councils, among others.

The Grievance Redress Mechanism established for the project either needs to be adapted and/or changed as necessary to ensure it is culturally appropriate and accessible to affected Indigenous population, and takes into account the customary dispute settlement mechanisms within these communities. The grievance mechanism should be accessible and inclusive, to facilitate the resolution of grievances promptly and protects against reprisals for the use of its services. This should be done in consultation with Indigenous people's representatives. The Ministry of Amerindian Affairs has identified the following avenues for dealing with complaints from Amerindian communities which can be considered for incorporation into the Grievance Redress Mechanism:

- District Council, composed by all Toshaos from the district along with one representative from each Village Council in the district;
- Community Development Officer: located at a district level and responsible for intermediating between Amerindian communities and the Ministry of Amerindian Affairs;
- The National Toshaos Council: comprising all elected Toshaos in the country; or
- Complaints can also be filed directly with the Ministry of Amerindian Affairs.

Once an acceptable draft of the IPP is prepared it is to be publicly disclosed nationally, which should be done via the MoE website. The draft IPP will also be disclosed on the World Bank project information portal. During the public disclosure period, the IPP will be presented to relevant stakeholders including the Ministry of Amerindian Affairs, Regional Education Officials, and representatives of the Indigenous population. Feedback from public disclosure will be then incorporated in a final document and then it will be re-disclosed. Personally identifiable information of participants will be hidden in disclosed documents.

## **6.2 Elements of the IPP**

The IPP should include the following elements:

1. A summary of the Project.
2. A summary of the Social Assessment, including the applicable legal and institutional framework and baseline data. This can be drawn from that which is already presented in this IPPF.
3. A summary of the results of the engagements tailored to IPs conducted.
4. A detailed description of the potential risks and benefits of the Project on the Indigenous population that are culturally appropriate and gender sensitive, and steps for implementing them.
5. A detailed description of culturally appropriate measures to avoid, minimize and mitigate for any potential adverse impacts that were identified in the social assessment, and steps for implementing them. Measures to enhance positive benefits may also be included.
6. A framework for meaningful engagement with the Indigenous community during project implementation, including FPIC contingency provisions, as applicable.
7. The cost estimates, source of funding, implementation schedule, and institutional arrangements including roles and responsibilities for implementing the IPP.
8. Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the IPP.
9. Accessible procedures culturally appropriate to the project to address grievances by the affected Indigenous population.

## **7.0 Implementation and Monitoring Framework**

The IPPF and IPP implementation will follow the Project implementation arrangement with the Ministry of Education through the PIU. The PIU would be responsible for day-to-day management, monitoring, and coordination of implementation of the Project. The PIU would consist of a Project Coordinator, and includes a Social Development Officer (full or part time, to be confirmed). The Project Coordinator will be responsible for overall guidance and policy advice, internal coordination, discussion and resolution of project matters with counterparts and other government agencies, donor alignment and harmonization, and public disclosure and civil society involvement.

The Project Coordinator will also be responsible for ensuring that the environment and social documents prepared for the project are adhered to, such as this IPPF and IPP, and the required environment and social activities are implemented. The Project Coordinator will supervise the Social Development Officer, and the consultants working on the implementation aspects of the Project.

The Social Development Officer will be responsible for the implementation of this IPPF, including ensuring that the social assessment is conducted and the IPP prepared. The Social Development Officer should ensure that there are no project implementation activities relating to Indigenous peoples until the IPP is prepared. The Social Development Officer should also ensure that the IPP is prepared based on the process outlined, and all aspects addressed.

During the preparation of the IPP, the Social Development Officer will assess if there is a need for capacity building measures to implement the IPP. The Social Development Officer will also be responsible for ensuring that the IPP is consulted and disclosed. Once finalized the Social Development Officer is expected to ensure that the IPP is implemented, and should conduct monitoring to ensure that any potential impacts on the Indigenous population are mitigated and that they benefit adequately from the Project, monitoring the indicators and benchmarks defined in the IPP.

## 8.0 Consultations

Once the draft IPPF was prepared the Ministry of Education consulted with relevant stakeholders. The objectives of the stakeholder consultations were to:

- Introduce the project to stakeholders;
- Share the draft IPPF for their review;
- Provide a platform to receive feedback, including concerns and recommendations.

Given the COVID-19 pandemic and the associated restrictions nationally, as well as to ensure the safety of all involved, it was decided that the most suitable platform for the consultation was email. To commence the consultation process, the key stakeholders relevant to the project and the IPPF were identified. These are outlined in the table below and consisted of representatives of Government institutions as well as Non-governmental Organisations.

**Table 3: Stakeholders Relevant to the IPPF**

Key Stakeholders	Email Address
National Toshias Council	ntoshaoscouncil@yahoo.com
Ministry of Amerindian Affairs	ps@moaa.gov.gy
Ministry of Social Protection	statisticalunit.mosp@gmail.com
Amerindian People Association	apaguy@networksgy.com
Guyana Teachers Union	marpet_73@yahoo.com

The Ministry of Education sent an email to the identified stakeholders on April 09, 2021 which briefly introduced the project and provided the reasons for the consultations. A copy of the email sent to stakeholders is attached as Annex A. Stakeholders were given two weeks, up until April 23, 2021 to review the document and provide their feedback. It was indicated in the email that if there was no response from stakeholders by the indicated date then this will be considered an endorsement of the document.

During the consultation process only one feedback was received. The feedback was provided by the National Toshias Council, which indicated that they have endorsed the IPPF and are looking forward to its implementation. A copy of this feedback is attached as Appendix B. It is assumed that the other stakeholders have endorsed the IPPF. No revision to the draft IPPF was required based on the consultation exercise.

## Annex A: Email sent to Stakeholders on the IPPF and the Consultation

Dear Education Partners,

The Ministry of Education (MOE) has benefitted from a 7million USD grant from the Global Partnership for Education (GPE). GPE is a global fund dedicated to supporting education. This Grant will enable the ministry to address critical strategies associated with improving learning outcomes and management and accountability within the sector, as articulated in its 2021-2025 Education Sector Plan (ESP). The ministry is about to undertake the Guyana Education Sector Program Project implementation; part of this process requires consultation on the attached documents as part of the Environmental and Social Commitment Plan (ESCP). The ESCP is a document that articulates the measures that will be undertaken by the Project Implementation Unit that is in accordance with the environmental and social standards. Your organisation's review and feedback are important to the MOE and its process. Please feel free to provide your organisation's feedback **no later than Friday, April 23, 2021**. Please be informed that no response by this date will be construed as an endorsement of the documents. Thank you for your continued support of education. Have a blessed weekend, and continue to stay safe.

Best regards

**Nicola M. Johnson (Mrs)**

Chief Planning Officer

**Phone** 592-226-0264 **Mobile** 592-687-1680

**Web** [www.education.gov.gy](http://www.education.gov.gy) **Email** [chief.planner@moe.gov.gy](mailto:chief.planner@moe.gov.gy)

26 Brickdam, Stabroek, Georgetown, Guyana.



## Annex B: Feedback provided by the NTC

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**From:** National Tshaos Council <[ntoshaoscouncil@yahoo.com](mailto:ntoshaoscouncil@yahoo.com)>

**Sent:** Friday, April 23, 2021 10:57 AM

**To:** Chief Planning Officer <[chief.planner@moe.gov.gy](mailto:chief.planner@moe.gov.gy)>

**Cc:** Laleta Murphy <[mandeofficer@moe.gov.gy](mailto:mandeofficer@moe.gov.gy)>; Russian Dorrick <[russian.dorrick@gmail.com](mailto:russian.dorrick@gmail.com)>; Nicholas Fredericks <[nicholaskokoifredericks@gmail.com](mailto:nicholaskokoifredericks@gmail.com)>; Paul Pierre <[paulntcvc27@gmail.com](mailto:paulntcvc27@gmail.com)>

**Subject:** Re: MOE - Indigenous People Planning Framework and Labour Management Procedure Consultation

Dear CPO,

Please note that the NTC endorsed the IPPF.

The NTC looks forward to be involved in its implementation.

Kind regards

Jude Da Silva  
for NTC.

**Annex C: Template to Capture Consultations/Stakeholder Feedback Minutes**

I. Background

- Background about the stakeholder engagement/consultation activity (eg. Is it a follow up from a previous consultations ? Did it take place as part of a supervision mission ?)
- Objective of the consultation.

II. Description of the Stakeholder Engagement Activity :

- Who was consulted ?
- What ? (What is the engagement about ? Which sub-project ? Which issue? )
- Where?
- When ?
- How ? Methods used for the stakeholder engagement activity (public meeting, small group discussion via – zoom, WhatsApp, individual consultations by phone, feedback via online survey etc.)

III. Feedback Received from Stakeholders and Project Team’s Response

Question/Feedback/ Comment Received from Participants	Project Team’s Response	Next Steps/ Actions to be taken based on this feedback (if any)	Reponsible Entity/Person for the follow-up Action (if any)	Date for Follow-up Action (if any)

IV. Supporting Documents

- List of stakeholders consulted. Contact information.
- Any photos, if available.
- Other relevant documents

Note: Photos and personal contact information of the individuals can be kept in internal records, however, will not be included in publicly disclosed documents for reasons of confidentiality.