



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Tanzania	AFRICA	P170480	
Project Name	Tanzania Secondary Education Quality Improvement Project (SEQUIP)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	11/25/2019	1/7/2020
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance and Planning	President's Office, Regional; Administration and Local Government, Ministry of Education, Science and Technology		

Proposed Development Objective(s)

To increase access to secondary education, provide responsive learning environments for girls, and improve completion of quality secondary education for girls and boys.

Financing (in USD Million)	Amount
Total Project Cost	500.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Boosting Tanzania’s human capital, especially among women, is critical to accelerating shared economic growth. Girls' Access to and completion of quality secondary education is associated with many socio-economic benefits. Over the last three years, secondary education outcomes have improved. The number of children in secondary school grew substantially, largely due to the Fee Free Basic Education Policy (FBEP) introduced in 2016. However, three main challenges in secondary education remain, which the project aims to address: (i) improving access to and completion



of quality secondary education for girls and boys; (ii) ensuring a safe, supportive learning environment to keep girls in school longer; and (iii) expanding effective Alternative Education Pathways (AEP) to enable girls who drop out of lower secondary school, especially young mothers, to finish the lower secondary education cycle and enter upper secondary schools.

The project will consist of the following four components: (i) Component 1: Empowering Girls Through Secondary Education and Life Skills; (ii) Component 2: Digitally-Enabled and Effective Teaching and Learning; (iii) Component 3: Reducing Barriers to Girls' Education through Facilitating Access to Secondary Schools; and (iv) Component 4: Project Coordination, Monitoring and Evaluation.

SEQUIP will contribute to three pillars of the World Bank Group's Country Partnership Framework (CPF) 2018-2022: (i) diversify growth and enhanced productivity; (ii) boost human capital and social inclusion; and (iii) make institutions efficient and accountable.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

PROJECT LOCATION: The Project will be implemented nationwide (in rural and urban areas) and as such the exact locations of the new and rehabilitation schools and Alternative Education Pathway (AEP) facilities to be supported are currently unknown.

PHYSICAL CHARACTERISTICS: Tanzania is a large country with 21 regions and 184 districts (administrative divisions) which will be responsible for the project at the local level. The country expands through mountainous, plateau and coastal areas. Tanzania holds unique ecosystems (40% forest cover), rich biodiversity and large number of protected and key biodiversity areas.

WATER: The country is affected by land degradation and increasing water scarcity in both urban and rural areas. Even the most important cities have issues with water supply and water quality. Many existing schools have no water or electricity supply. A major physical characteristic relevant to the project is the uncertainty over if water will be available for the schools and how to ensure water quality. Some schools use rain water storage as their water source; but this option is not secure in terms of quality and reliability. It is common to see students attending schools (especially in rural areas) carrying a bucket of water due to the lack water supply in the schools. Water supply and sanitation in the schools is challenging and a critical aspect for the success of this project will be to ensure health, sanitation, WASH and wellbeing of the students (in particular girls) and teachers. Water served to children at schools is usually rain-harvested or collected from nearby streams and water quality is not usually monitored.

Government School Construction Strategy: The Government of Tanzania is developing a School Construction and Maintenance Strategy outlining the number of classrooms: students, adequate WASH facilities; multi-purpose science labs, electricity, and so on and minimum construction standards. These standards are still under development and are being developed with technical input from the Bank.

The ESF instruments that have been prepared for SEQUIP incorporate measures for project site selection and to ensure designs and school construction align with the ESF requirements. It has been agreed that civil works will follow building standards acceptable to the World Bank and required under the ESF; taking into account structural



safety, universal access, changes in the standard drawings, water source availability and quality, efficient use of materials (wood) to reduce pressure on natural resources, Water and Sanitation for Health (WASH) and solid waste management at the schools, among other risks identified as part of the due diligence process. Site selection for school construction is very important to avoid possible direct and indirect environmental and social impacts and lack of water sources for construction and during operation.

HAZARDS: Floods, droughts, heavy rainfall and earthquakes must be considered in site selection and safety construction parameters for civil works. In previous construction activities schools have shown technical deficiencies due to the lack of beams, vertical columns and lack of application of security factors in the design, associated with weaknesses in supervision of construction. Tanzania has also experienced earthquakes before which caused the collapsed of public infrastructure, including schools. It has been agreed that construction will consider structural safety to ensure the safety of students and long life of the buildings. The Bank has agreed with the Ministry of Education that the civil works for SEQUIP will follow building /construction standards and standard drawings acceptable to the World Bank and the requirements are described in the Environmental and Social Management Framework (ESMF) (Annex 14) and will be further detailed in the Project Operation Manual (POM).

LABOR AND WORKING CONDITIONS: Tanzanian labor laws include provisions to protect workers' rights, including Occupational Health and Safety (OHS). However, implementation especially for individuals or small local contractors (independent builders) in rural areas is weak. Frequently these contractors work without adequate protections in place including risk assessments, the use of Personal Protective Equipment (PPE) and medical insurances. Management of these issues is covered in the ESMF and Labor Management Procedures that have been prepared. However, implementation will need to be closely monitored throughout the project.

PROJECT STRUCTURE: A national team formed by staff from Ministry of Education Science and Technology (MoEST) and Presidents Office- Regional Affairs and Local Government (PO-RALG) will lead the overall project but there is limited experience in environmental and social management. The Local Government Authorities (districts) will play the main role in the planning and construction of schools under SEQUIP together with ward representatives and village committees. These three levels of government will play an important role in the planning, implementation and monitoring of sub-projects (individual schools or rehabilitation projects). Community relations with schools has been considered in the engagement approaches during implementation as well as part of community monitoring.

Primary and secondary schools are generally seen as community assets, with an associated School Board. This School Boards will create School Construction Committees (SCC) which will be responsible for coordinating with the community in requesting the need for a school needs to the District; if approved, the SCC will be responsible of managing the funds, hiring and supervising of builders. The level of literacy is low in rural areas. The contractors for the proposed infrastructure of the project will be local builders "mafundi" who are informal workers and lack OHS equipment and culture for basic safety measures. In addition, many of these workers do not implement national law or the requirements of Environmental and Social Standard (ESS) 2 in relation to working conditions (provisions of contracts, working hours, payment etc.). Child labor is also common in the construction industry in Tanzania and children sometimes provide the 'community contributions' such as collecting water for the construction activities. The complexity of institutional arrangements and the lack of experience in the ESF and environmental and social issues by the implementing agencies were addressed through the preparation of the ESF instruments agreed for this operation.



VULNERABLE GROUPS: In Tanzania there are a number of pastoralists and hunter-gatherers who are living traditional lifestyles. These groups include the Maasai, Hadzabe, Akie, Sandawe and Barbaig who generally live in the North of the country. The Akie, Sandawe and Hadzabe are predominantly hunter-gathers while the Maasai and Barbaig are traditionally pastoralists. Within these groups the sense of ownership of schools and the perceived importance of education may be lower. In addition, access to education for children is influenced by the groups economic/ livelihood activities. These groups' relationships with schools have been taken into account in both the engagement approaches as well as ensuring equitable access to benefits. Site selection for schools will be very important to avoid encroachment onto these groups' traditional lands as well as conflict over natural resources such as water.

According to the 2008 Disability Survey in Tanzania 7.8% of the population aged over 7 have a disability. Data on enrollment rates for children with disabilities is very variable but may be as low as 0.1-0.5% (CCBRT Education Study) with most children with disabilities traditionally attending special schools. Other vulnerable groups are present in society who may be less able to access Project include people living with albinism, the poorest children, those with limited English language skills, those that are marginalized because of social bias, etc. Measures under Components 1 and 2 aim to address these issues. Secondary schools are often several miles walk from pupils' homes, generating challenges in accessing schools safely; this is especially true for girls who can be subject to Gender Based Violence (GBV) or Sexual Exploitation and Abuse (SEA), potentially resulting in girls dropping out of the education system. Girls who are also subject to other forms of vulnerability (poverty, disability etc.) may be at a higher risk of GBV/SEA compared to their fellow students. Measures have been incorporated into the project design and environmental and social instruments to address these risks including decreasing the distance to schools and establishing 'walking buses' to provide safe passage.

LAND: Land is public property and rights to the land are issued in the form of residential leases and certificates of rights to occupancy. However, many land owners do not have documented rights. The construction of new schools and the extension of existing schools may require the acquisition of land on which people are currently living or using to support their livelihoods (including vulnerable groups). Site selection will be important in minimizing the extent of resettlement including of informal land owners and or users who were present in an area prior to the selection of a site for a school.

D. 2. Borrower's Institutional Capacity

There are multiple actors at the national, regional, and district levels who will have responsibilities for the environmental and social risk management in the project. These risks lie in all project components and include the management of risks related to inclusion of Vulnerable Groups, management of GBV complaints, management of environmental and social risks related to construction, among others. The overall capacity of all these levels to manage environmental and social risks and impacts in line with the ESF is limited and there are additional capacity constraints that will limit efficient supervision (staff and mobilization – time availability, logistical support, etc.). In order to strengthen capacity, the project will undertake an assessment of the capacity for engineering, environment and social management in the project districts. This capacity assessment will be undertaken at the same time as the evaluation of the schools needs that will be performed across the country. The assessment would then guide targeted supervision support and hands-on training for the districts. The capacity assessment, supervision support, and hands-on training will be provided by a supervision support firm which will be procured early in project preparation for an initial two-year contract and financed from Component 4. In addition, the project will include staff focused on environmental and social risk management including a GBV specialist at the national level, and environmental and social focal points at the regional level.



The following agencies will participate in the project implementation:

Main central units

1. Ministry of Education, Science and Technology (MoEST) is responsible for education policy and planning and overall coordination/implementation, setting of standards and strategies.
2. President's Office – Regional Administration and Local Government (PO-RALG) is responsible for implementation of school-level activities through the Local Government Authority (LGA).
3. Cross-Ministerial SEQUIP Coordination Team (SCT) consisting of members from MoEST and PO-RALG will be implementing the project at the national - political level.
4. Vice President's Office, Environment Division oversees operations of the National Environment Management Council (NEMC) which is responsible for ensuring compliance with the National Environmental Act (EIA regulations).
5. Ministry of Natural Resources and Tourism is responsible for management of protected areas, wildlife, cultural and tourism resources.
6. The Division of Antiquities is responsible for the protection of cultural heritage.
7. The Ministry of Lands, Housing and Human Settlement Development is responsible for formulation of land policy and matters pertaining to land.
8. The President's Office, Labour and Employment is responsible for labour, social security and employment.
9. The Institute for Adult Education (IAE) that coordinates the Alternative Education Pathway and reports to MoEST.

Regional Level:

1. Local Government Authorities (LGAs): will be responsible for the implementation and supervision of construction works, and their completion to a good quality and compliance with the ESF. LGAs are affected by uneven allocation of staff. The LGAs have limited capacity to handle environmental, social health and safety aspects of the project. LGAs will need strengthening to apply the ESF, develop sub-project specific instruments, undertake monitoring and be able to supervise the School Boards construction monitoring activities.
2. LGA Environmental Units: represent NEMC at the district level. Based on due diligence field work, technical capacities and operational support are low (lack of transportation, internet, fuel, instruments, etc.).
3. LGA Engineers: part of the LGA responsible for supervising the works. Despite substantial training of LGA Engineers that has taken place as part of previous WB projects, challenges remain such as frequent staff transfers, inadequate staffing or time and resources for supervision.

Local Level:



1. School Boards will be responsible for complying with all national laws regarding the environment and with all social guidelines and targets; implementing the school construction program and the mitigation measures, technical and engineering designs and drawings, and civil works contracts. They will be responsible for supervising the civil works and contractors at the project sites. However, their experience in environmental and social supervision while unclear is expected to be limited.

2. Local contractors: the project design will include the use of local contractors (builders- mafundi) who will be hired via forced contracting. Builders will implement the mitigation measures defined for the site and works included in the contracts, including matters related to ESS2.

Based on previous education projects involving MoEST and PO-RALG their capacity for managing environmental and social risks is very low. Furthermore, the World Bank policies and standards are new to both ministries and the LGAs since they have been implementing PfR projects to date. Therefore, it has been agreed that the project will hire consultants based on a Terms of Reference to be included in the POM to support the LGAs teams in capacity building on the ESF requirements and in the supervision of the activities and works to be financed across the country. In addition, the POM will describe the: (a) terms of reference of the key environmental and social team for SEQUIP, (b) the documents agreed to be followed for the environmental and social management of the project namely the Environmental and Social Management Framework (ESMF), Vulnerable Groups Planning Framework (VGPF), Resettlement Framework (RF), the Stakeholder Engagement Plan (SEP), and the Environmental and Social Commitment Plan (ESCP); (c) the formats of project environmental and social reports; and (d) the institutional arrangements for the Project’s environmental and social management.

Public Disclosure

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Substantial

Environmental Risk Rating Substantial

The project is rated as Substantial because of the following reasons:

- The project will support a large number of civil works dispersed nationwide the location of which are not known at this stage.
- The limited experience and capacities that the government at different levels have with the application of the new Environmental and Social Framework (ESF) and capacity for proper supervision.
- The high number of stakeholders that will participate in project implementation from national agencies (Ministries), regional, districts and wards which experience and capacity to supervised, evaluate, mitigate and prevent environmental impact will be challenging.
- The weak enforcement of regulations due to diverse factors that affect government offices (limited staff, transportation, budget to pay for fuel and per diems).
- The project will need to secure water resources supply for construction and drinking needs of students and teachers and local communities; water is currently very scarce, and some sources are seasonal, overused or contaminated in some areas.



Potential impacts: Land use change could occur in some areas due to the installation of the schools and waste management that will be needed. The cumulative impact of the works and presence of contractors and machinery at each targeted district is unknown at the moment, but careful supervision will be needed to avoid accidents, loss of cultural assets and potential conflicts with local communities. Other potential impacts at the sub-project area level are related to (i) waste generated at construction sites which can pollute land and water bodies (cement mixing areas, metal, wood and paint residues, diesel and other residues); open pits in the soil can cause accidents; (ii) food residues can attract wildlife; (iii) cutting of trees to use as building material; (iv) road accidents; among others.

Occupational Health and Safety (OHS): this will be challenging to monitor and enforce because: i) the builders are local workers who will be contracted directly by the community, many areas are isolated, district engineers are few, and ii) there is no culture of safety or maintaining records (accidents, injuries, emergencies). The ESMF includes measures to address OHS aspects of the project but there are risks in how these will be enforced and complied with.

Regulations: Even though Tanzania has ample environmental legislation, enforcement is weak and the many entities participating in the project, many of which have participated in the implementation of education projects in the past, have low capacity to assess, manage and report on environmental and health and safety issues. This poses a major challenge to supervision and risk management. The project has included a budget for the application of the proposed mitigation measures of the ESS instruments (including training, seven environmental and social support staff, transportation, field equipment and monitoring tools).

Construction risks: The MoEST has prepared a construction strategy and standard drawings (designs) for school's civil works in the country. It was agreed with MoEST that SEQUIP will comply with minimum building/construction standards acceptable to the Bank and in compliance with the ESF, as described in general form in the ESMF and in greater detail in the POM.

Social Risk Rating

Substantial

The rating is substantial at this stage and a range of risks and impacts are expected in varying degrees.

The project will be implemented nationwide and a wide range of impacts may occur, which the Borrower has limited capacity to manage as noted above. Supervision will represent a challenge for the Project Coordination Unit due to the need to monitor a range of impacts in geographically dispersed projects for which there is limited local capacity and knowledge of the required social mitigation measures.

GBV/SEA risks: Girls are currently at risk of being subjected to GBV and SEA, both while travelling to school and when at school. Similarly, these risks exist in relation to access and use of Alternative Education Pathway (AEP) facilities. The Project will increase access to secondary education and reduce the distance some girls have to walk to school. However, the risk of GBV and SEA remains. Within schools and AEP facilities the risk will be higher while the relevant components of the Safe Schools program is being established (under Component 1) but is expected to decrease once the program is in place. Similarly, the development of measures to protect girls (and boys) on the way to schools (walking buses) will help to address the risk. Accessible and appropriate GBV/SEA grievance mechanisms and access to survivor services have also been incorporated into project design. In terms of inclusion, access to project benefits should be available for all students (including girls, persons of different ethnicity or religion, persons with disabilities, etc.) regardless of geographical location or demographic characteristics.



Construction-related risks: The potential risks and adverse impacts related to construction are unlikely to be significant for any given school (subject to appropriate mitigation measures being implemented). However, given the numbers of schools targeted, the geographic spread, the resulting supervision challenge, and the limited exposure to World Bank environmental and social standards, the risks to proper mitigation being implemented are substantial.

The projects may result in impacts related to land acquisition (Component 3). While for any given school particularly in rural areas the number of households that will be impacted is likely to be few in number, this will still require the development and coordination of numerous RAPs. The RAPs will be developed by the local LGAs who have limited experience in developing RAPs in line with the WB ESF. Furthermore, there is the risk that not all users rights will be recognized if only national laws (rather than ESS5) are followed and there may be pressure on land users to give up their rights for community benefits. A Resettlement Framework has been prepared which details the principles and procedures for land acquisition, restrictions on land use, involuntary resettlement, and land donation.

The construction of new schools and the presence of workers has the potential to result in impacts to community health and safety including but not limited to increased transmission of diseases (communicable and vector borne), road traffic accidents, accidents at construction sites if communities enter them (including quarries) and the risk of Gender Based Violence (GBV) or Sexual Exploitation and Abuse (SEA). Related mitigation measures are detailed in the Environmental and Social Management Framework. In addition, the project design includes a GBV Grievance Redress Mechanism and as part of the staffing at the national level, a GBV specialist.

As this is a nationwide project, environmental and social risks will need to be considered differentially in relation to different societal groups including any relevant groups under ESS7 Indigenous Peoples/ Sub-Saharan African Historically Under Served Traditional Local Communities (referred to as Vulnerable Groups). In the absence of appropriate engagement and mitigation there is the potential for ESS7 commun

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

All SEQUIP financed activities will apply the ESF and instruments prepared to manage environmental and social impacts. Component 1 of the project will implement a safe school's program (SSP) which will provide life skills training, codes of conduct, training on GBV, establishment of grievance systems, an ICT system to track girls at risk of drop out and expansion of the AEP network with outreach. In Component 2 digitally enabled effective teaching and learning will be implemented. Component 3 will require civil works to build new or rehabilitate secondary government schools. The provision of water, electricity, internet connections and road improvement will be through the collaboration with other government agency or other World Bank projects.

Due Diligence: For this assessment, the team reviewed ISR and environmental audits reports, the Education PforR constructions, performed field visits to school constructions and met with counterparts (LGAs, teachers, students and mafundi).

ASSESSMENT



1. National Scope SEQUIP will disburse project funding on the basis of the number of schools in each LGA meeting minimum infrastructure standards. New schools will be constructed and existing schools refurbished. This will result in a range of environmental and social impacts which are addressed through the instruments.
2. ESF The project counterparts have limited knowledge on environmental and social management for the application of the ESF instruments for components of the project such as school construction, SSP, expansion of the AEP and associated outreach.
3. Screening tools, evaluation, permits and monitoring. The Bank team has supported the client in the preparation of the environmental and social assessment and of the screening and monitoring tools according to the mitigation hierarchy and the ESF. The Project has prepared an Environmental and Social Management Framework (ESMF) that incorporates national and the ESF requirements. The project ESMF includes: (i) screening checklists and procedures to identify risks for school construction with potential adverse impacts on natural habitats, physical cultural resources and existing land uses so that alternative sites can be identified or if necessary exclude the sub-project, (ii) supervision and reporting procedures, (iii) preventive and mitigation measures; (iv) institutional arrangements for the environmental and social management of the SEQUIP and (v) guidance on engagement as per the Stakeholder Engagement Plan; vi) a monitoring plan, vii) the need to develop an environmental and social information system, viii) labor management procedures, ix) capacity building plan and x) an environmental and social management budget.
4. All construction activities will be required to develop a site-specific Environmental and Social Management Plan taking into consideration its scope, location, socio-economic environment and the Environmental, Health and Safety Guidelines of the Bank to define specific mitigation and prevention measures to prevent and reduce risks and impacts. Site specific RAPs may also need to be prepared as well as vulnerable groups plans as required. Site specific ESMPs (and RAPs and VGPs where applicable) will need to be approved and implemented in line with the respective schedules before the construction activities are procured and contracted. All activities under component 1 and 2 will be screened for potential environmental and social impacts.
5. Environmental Impacts
 - 5.1. Construction Phase: The main environmental impacts are related to civil works such as noise, waste, construction dust, cutting of trees/vegetation, contamination of soil, generation of domestic waste, soil erosion, water effluents, sedimentation, air emissions, H&S issues, effects on public access roads etc. Indirect impacts relate to selection of the site construction (if it is too far from communities' students will have to walk 5-20 km passing many risks for attacks and accidents).
 - 5.2. Operational Phase: Potential risks and impacts that could occur during school operations are: (i) due to poor design or construction quality, water can infiltrate classrooms, walls, roofs which can crack and eventually affect the security of the room; (ii) poor management of rubbish could bring fauna close to the school which can generate confrontations with students or can generate vector-borne diseases; (iii) burning of rubbish and other waste can cause breathing of toxic fumes; (iv) poor water provision and quality will affect health; v) poor management of chemicals from science labs can cause burns and explosions (chemical include acids which are very dangerous); science labs have open channels in the floors which represent a hazard; vi) lack of water supply in the school will cause the beneficiaries -students- to walk many kilometers.
6. Social Impacts
 - 6.1. Construction Phase: The construction of new schools will generate social impacts, which will need to be avoided, mitigated or compensated. Potential impacts include community H&S associated with disease transmission and road traffic accidents, discrimination or in case universal access is not provided at schools that are being constructed or renovated, labor and working conditions, including conditions not aligned with workers' rights under national laws.



Impacts to cultural heritage could occur. These impacts have been addressed in the ESMF. Access to land for the construction of schools may result in physical and / or economic displacement resulting in the need for RAPs to be developed in line with the RPF. The construction of new schools will also need to take into account considerations of inclusion for all students including disabled students as well as parents and teachers. As the project is being developed nationally, these impacts could have differential effects on different groups in society. Capacity to monitor the implementation of the project and the implementation of social risk mitigation measures is limited as outlined above.

6.2. Operational Phase: During operation the Project aims to create safe school environments which will reduce the risk of GBV/SEA especially to girls, by among other things reducing distance to schools and raising community awareness for the need to ensure protection of girls and boys on the way to school. Poor management of schools (especially in relation to wastes and sanitation) can result in increased disease transmission, and in children (especially girls) being unwilling to attend school. Therefore, it will be important to maintain sanitary facilities and implement waste management.

6.3. Inclusion and stigmatization: Girls are more likely to face risks of exclusion (early pregnancy, early marriage and stigmatization) at school than boys. Other vulnerable groups include those with disabilities, people with albinism, people marginalized because of social bias, the poorest children, etc. These groups are at risk of being excluded from project benefits as a result of social bias and stigmatization. This will be addressed through the SSP and ensuring all groups are able to access learning programs. The Project will work with AEPs to implement relevant elements of the of the SSP. Girls who become pregnant can be stigmatized and may be less willing to continue their education and this will require specific measures to avoid stigmatization, ensure quality of education delivered in AEPs and remove barriers to re-entry in the mainstream education system, including specific follow up with these girls and their families to reduce self-exclusion. The risk of social conflict will be managed through the implementation of the Stakeholder Engagement Plan, which will promote awareness of the criteria of school selection, and the GRM.

6.4. GBV: GBV/ SEA risks exist during construction activities associated with the presence of construction workers. The presence of workers could exacerbate the risk of GBV/SEA. Construction workers may engage in sexual fraternization and transactional sex with younger women and girls. During operation there is a risk of girls engaging in transaction sex or be subject to GBV/SEA at schools and AEP facilities. The project aims to reduce this risk by building schools nearer to the community and through the SSP. In addition, GBV specific mitigation has been put in place which includes codes of conducts for construction workers, teachers and other staff employed at schools, GBV training for workers and as part of the SSP and the development of a GBV Action Plan including prevention and response measures, including a Grievance Mechanism.

7. Institutional arrangements: The counterparts at all levels will be responsible for the implementation of the project instruments to avoid, mitigate and compensate impacts. The project will designate the following for environmental and social management of the project: i) 3 full time environmental and social experts as part of the national-level team (1 environment expert, 1social expert, and 1 GBV expert); 5 social and environmental focal points at the regional level to support the LGAs.

The ESMF includes draft ToR for these staff. The POM will further detail roles and responsibilities for staff. To increase capacity to manage risks in line with the ESF, the following measures will be taken: i) consultants will provide support to LGAs for supervision and build capacity. ToR will be included in the POM of which the main aspects have been described in the ESMF. The building standards will ensure structural safety, universal access, WASH etc. ii) The annual verification for DLIs will perform an environmental and social audit. The audit will cover application of the ESF instruments, grievances and school construction including minimum building and safety standards agreed with the



government. Payment of DLI will be conditional on schools been built to these minimum standards specified in the POM.

ESS10 Stakeholder Engagement and Information Disclosure

The Project focuses on access to quality secondary education for girls and boys across Tanzania, with a special focus on girls, although benefits will also be felt by all pupils. The project prepared a Stakeholder Engagement Plan (SEP) and carried out a stakeholder analysis to identify the most relevant project stakeholders, affected and interested parties.

Project interested parties include national, regional and local authorities (LGAs and Village Councils), school boards and local communities as well as national, regional and local NGOs, CBOs and academia. Project affected parties (individuals or groups) might include local communities that will or will not benefit from the project, disadvantaged or vulnerable individuals such as women, the disabled etc.

A Communication Plan will be implemented for each school construction (new or rehabilitation) to ensure proper participation and engagement of local communities/villages (including elders, women and influential people such as religious leaders) that might be affected because of the works, as well as of communities along the transportation route for construction materials or where materials might be extracted. Community consultations highlighted the need for transparency in terms of site-specific activities, but also national level decisions such as the criteria for identifying target schools under Component 3. During implementation it will be critical that information on criteria is shared at the community level, including in areas where there are vulnerable groups, to mitigate the risk of community discontent.

Engagement will also be needed with land owners of selected project sites; local environmental NGOs and Community Based Organizations (CBOs). Other interested parties may include any administrative regions that do not benefit from the project as well as local, national and international NGOs. Following the requirements of ESS10, all stakeholders (including beneficiaries-students, professors, NGOs working with pregnant girls, villages, local governments, as well potential affected groups) will need to be engaged with on the various components of the Project. Engagement activities will need to be culturally sensitive and inclusive and consider the presence of groups covered by the provisions of ESS7 and ESS1.

GRIEVANCE MECHANISMS: As part of the Stakeholder Engagement Plan (SEP), grievance mechanisms have been established to address recommendations, complaints and any claim that could arise as a result of the project implementation. The GRMs will be accessible to a wide range of stakeholders and beneficiaries or potential groups that can be affected by the project. The GRM will have three levels including a school construction GRM, an operational schools GRM, and, a general GRM. The grievances have multiple uptake points including suggestion boxes, telephone lines, WhatsApp, and staff. If the GRMs do not achieve resolution at the local level the affected people/ community members can seek resolution through higher levels of government (LGA and Regions) and through the Judiciary system. Following feedback from consultations, the project will increase awareness of the GRM during implementation, using accessible materials such as pamphlets. In addition, the project will provide updates on overall implementation of the GRM (such as grievances received and resolved) to stakeholders on a regular basis.



DISCLOSURE: The draft ESMF, RF, VGPF, SEP and ESCP were disclosed by the MoEST and PO-RALG on November 4 – 5 2019. Updated documents were disclosed by MoEST and PO-RALG on November 28 2019 and by the World Bank on November 29 2019.

The project published and disclosed the documents in a project dedicated webpage in MoEST and PO-RALG. Short summaries of these instruments were translated into Kiswahili and also disclosed in these webpages.

CONSULTATIONS: Consultations were held in Singida, Manyara, and Coast region from November 8 – 14 2019. Vulnerable Groups participated in Manyara and Singida. Participants included representatives from women’s groups, community-based organizations, People with Disabilities, tradesmen, and government officials. 36% of participants were women, 64% men, 45% from Vulnerable Groups. Issues and concerns raised during the consultations have been incorporated into project design or environmental and social instruments, as appropriate.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will include direct, contracted and supply chain workers as follows:

- Direct Workers who will consist of SCT staff who have been designated to work on the project, teachers once schools are operational and staff at the AEP facilities. The number of SCT staff will be relatively few in number and will include a number of existing civil servants. However, the number of teachers and AEP staff is likely to be extensive once all new schools are functional and AEP facilities expanded. These workers will likely be highly educated national personnel who are aware of their labour rights.
- Contracted workers who will consist of construction workers including builders, masons, plumbers etc. who will be locally contracted. The overall number of construction workers is likely to high overall given the extent of construction across Tanzania and will mainly consist of unskilled of semi-skilled male Tanzanian nationals. However, for any given school the number of workers is likely to be limited to 10s of people for a few months. Facilitators and consultants will be hired to provide technical assistance for elements of the project and undertake capacity building. These are likely to be limited in number and will consist of highly educated national personnel who will support the project for varying durations.
- Primary supply chain workers will mainly work for companies providing materials needed for construction activities. There will be a number of such suppliers across the country for the various construction activities who will provide a relatively limited number of materials for any given LGA.

WORKING CONDITIONS:



The use of forced labor is considered to be unlikely given the community based contracting model for construction and that many of the direct employees will be government employees (civil servants). Facilitators and consultants will need to demonstrate the use of skilled personnel who are unlikely to be subject to forced labor.

Employment of children by contractors may occur as child labor is known to exist in the construction industry in Tanzania. In addition, existing students where rehabilitation is being undertaken may be required to support the construction by undertaking menial tasks such as collecting water. The labor management procedures (LMP) in the ESMF explicitly forbid the use of child labor on the project including by students. In addition, awareness raising will be undertaken with communities and contractors that child labor is forbidden. Age verification is required for all employees through the use of national ID cards which are routinely held in Tanzania. In addition, contracts are required for all workers.

Construction staff face the risk of exploitation and unfair treatment by employers including long working hours, lack of rest periods, irregular payments and lack of contracts. Unskilled and semi-skilled workers unlike skilled workers may lack knowledge of their rights or be willing to waive these rights in order to gain employment. In order to address this the LMP requires that all contracted workers are provided with contracts in line with national law and the provisions of ESS2 and training on the same. Selection of contractors will require due diligence to be undertaken to ensure that workers are employed in line with national law and ESS2. A worker grievance mechanism will also be established and workers made aware of the same in order to address any complaints or issues that arise.

Female workers may face discrimination) or be subject to SEA in the workplace both at work or during recruitment from male supervisors and colleagues. All workers will be required to sign a code of conduct with provisions on GBV and SEA and will be trained on the provisions of the code including disciplinary procedures. The LMP also includes provisions for zero tolerance on these issues.

OCCUPATIONAL HEALTH AND SAFETY (OHS): Risks associated with Occupational Health and Safety could occur during the following activities:

Construction: OHS of the workers during the construction phase is a concern due to the types of accidents that can normally occur on construction sites that could cause loss of life, limbs and injuries among others. This includes risks associated with working at height. Understanding of OHS risks and prevention in line with national law and ESS2 by construction workers is likely to be limited as they will be local contractors (mafundi). These risks will be managed through a variety of measures as presented in the LMP including the provision of Personal Protective Equipment (PPE) such as safety boots and gloves for construction workers, good housekeeping on site, fencing of sites and through the implementation of the environmental and social clauses for contractors which have been prepared in draft (Annex 11 of the ESMF).

OHS during Operation of Schools / AEP Facilities: Teachers are exposed to OHS risks during operation including emergency preparedness, handling of chemicals (in science labs) etc which will need to be managed. To address these risks Emergency Preparedness and Response Plans will be developed along with plans for storage, handling and disposal of hazardous materials (in particular chemicals) used in science laboratories.

ACCIDENTS AND EMERGENCIES



During operation, the schools could face a number of emergency situations due to different hazards and conditions that could lead to injuries and fatalities to students and teachers. This includes risk of fires, earthquakes, wildlife or domestic animal attacks, failure of infrastructure, contamination and handling of hazardous materials. The ESMF requires that an Emergency Preparedness and Response plan is developed and that students and teachers are trained on the relevant elements of the plan including drills. Fire extinguishers, smoke detectors etc. should also be installed and maintained.

ESS3 Resource Efficiency and Pollution Prevention and Management

Wood resources. The project reviewed subproject design and recommended measures to reduce or replace the use of wood in beams in school chairs, desks, roof, windows, and other construction materials to reduce the environmental footprint of the project and recommend the use of the most durable and efficient materials. It is been agreed that construction or rehabilitation of schools will follow minimum construction standards described in the ESMF and that will be further developed in the POM. No hazardous substance will be used for painting or treating wood and included in the WHO list (1a, 1b, II).

Waste management. During construction, the local contractors will be required to protect the soil and nearby streams from use for cleaning machinery and disposing hazardous construction wastes or residues in natural habitats or natural areas around the construction site. The ESMF includes measure to define construction disposal sites according to acceptable parameters of ESS3 and to ensure that contractors do not leave hazardous wastes in the villages (paint containers, cement bags, diesel/oil containers, batteries, etc.). Solar panels might be used in some schools and these can break or become nonfunctional. Batteries which are used to store solar panels energy can become also hazardous electronic waste in rural communities. The ESMF includes measure to ensure that in the case that contractors use generators and fuel they will have to apply best measures to avoid accidents, spills and explosions. The project will also ensure that solar panels do not become liabilities in rural communities. Other project activities related to ICT development will also be reviewed to ensure proper management of e-waste and ensure proper solid waste management by the project. During rehabilitation of existing schools, the project will ensure that hazardous materials are removed, and workers safety is ensured.

Energy use: The project requires different forms of energy supply for the schools such as electricity, fuel wood and charcoal, which is the major energy source for cooking purposes in the schools. The project will ensure efficient use of energy resources in an environmentally sound manner in accordance with ESS3. In addition, the school's construction strategy should consider alternative source of energy such as solar energy/ biogas/ biomass especially in areas which are not connected with National Grid for electricity supply. SEQUIP will liaise with Ministry responsible for energy and its allied institutions to ensure provision of reliable electricity supply for new or expanded schools without electricity.

Water use: access to water is a very important success factor for the project. Water is needed for the construction of the works and the WASH systems expected to be installed in the schools. However, in some areas, water is scarce and its uses, collection, storage, access and management and potential pollution as part of project design will need to be



addressed during construction and operation. There are many different water-borne diseases that are common in the area (malaria, dengue, diarrhea) which will require prevention measures. It was agreed that water quality test will be performed to the proposed water source as part of the screening process described in the ESMF. Also, in order to support girl's health, specifically, menstrual health, school designs will ensure clean water for hand washing. The project has included the costing to ensure water supply for the school construction and rehabilitation. For operation, the school will count with a budget line from the capitation grant based on the number of students, as described in the ESMF.

The ESMF includes measures to promote the efficient use of natural resources and measures to prevent, mitigate and reduce pollution (air, surface and groundwater and soils). Also the ESMF requires that school selection is based on water availability and a checklist has been prepared that will be completed by the LGAS to ensure water volume is secured for school construction and implementation, measures for its protection and proper water quality delivery at schools. The ESMF also requires that SEQUIP will address issues related to resource efficiency and pollution control (water, air and noise standards) in line with the Environmental, Health and Safety Guidelines of the World Bank as per the requirements of ESS3.

ESS4 Community Health and Safety

The project will support investments nationwide which involves civil works (subprojects) which can generate potential risks or impacts to community health and safety. There is also a risk of GBV associated with the AEP facilities and operation of the schools which can affect community health and safety.

Environmental risks might include contamination of community water sources with construction materials, diseases brought in by the workers, contamination of soils with construction debris, open pits and liabilities left after the construction.

Potential social impacts may include increased risk of GBV/SEA associated with the presence of the construction workforce (including near schools and routes to school), and the transmission of communicable and/or vector borne diseases. In addition, any increase in vehicle movements associated with the construction activities, and local sourcing of materials, could also increase the risk of accidents involving members of the community and workers. However, the use of local contractors close to the communities may help in limiting these risks. A GBV Action Plan will be developed and implemented which includes the use of Codes of Conduct which will, in part, reference principles related to GBV. The GRMs will also be in place and are designed to receive GBV-related complaints. As part of the GBV action plan identification of relevant government agencies and/ or NGOs in the district who can provide survivors of GBV and exploitation and abuse and harassment, access to survivor centered services such as medical care, psychosocial support, legal redress, safety, etc as and when necessary within each district to ensure access to relevant psycho-social, legal, and health services for survivors.

The ESMF includes measures and procedures to maintain community health and safety and reduce road accidents (road safety plans- with local builders), although difficult to ensure because many schools are far from government offices – the School Board, Ward and District authorities will be responsible to ensure the compliance with this ESS4



and measures included in the ESMF and other ESS documents. The project will register accidents and fatalities in a log book and will inform these to the National Environmental and Social coordinators to be hired by the project.

There is the potential for emergency situations to arise associated with fire, natural hazards such as earthquakes and use of chemical etc. in schools. An Emergency Preparedness and Response Plan will be developed for each school as outlined in the ESMF. The plans will be developed in coordination with the LGA, fire stations or other community groups that can help in case of emergencies.

The project seeks to ensure the inclusion of pupils with disabilities by facilitating access to new schools. The standard design drawings will include provision for universal education. This will be in line with the Government of Tanzania's 5-years National Strategy for Inclusive Education 2018-2021 which requires classroom blocks and sanitation facilities are accessible.

It has been agreed that the project will implement minimum requirements for building /construction standards acceptable to the Bank and described in categories in the ESMF and in more detail in the POM to ensure structural safety, universal access, water quality connection, clean rainwater harvesting, WASH considering girls-needs, among other topics.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

In order to construct the proposed additional schools (and potentially upgrade existing ones), land may need to be acquired. As the locations of schools and facilities are not currently known, it is not possible to determine the exact nature or extent of any physical and / or economic displacement that may occur. The Project will need to consider those with formal rights to the land and those using land informally as per the provisions outlined in the RPF. The RPF and VGPF developed for the project also consider the needs of vulnerable groups.

Key to minimizing impacts associated with resettlement will be appropriate siting of facilities to avoid displacement of land owners and users. Site selection checklists have been developed as part of the screening process within the ESMF to avoid and minimize resettlement and if required identify the need to identify alternative sites as a result of the extent of any displacement. A Resettlement Framework has been prepared outlining the overall approach to resettlement including the process to develop, approve and implement site specific Resettlement Action Plans or Voluntary Land Donation agreements for each school or facility site as required. Particular attention will be given to ensuring that any proposed voluntary land donation is fully consulted with all parties involved and that affected people fully understand their options and in line with all Bank requirements and the guidelines in the Resettlement Framework, including not significantly impacting the livelihoods of vulnerable households or individuals and being well documented. If the land that is being donated is community land, community approval will also be sought.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources



Tanzania is a country rich in biodiversity and ecosystems. The Project will support civil works in some remote areas where wildlife and protected areas are present. Since Project intervention areas are not known, it is not possible to know if protected areas or biodiversity could be affected by the Project. Some potential impacts might include increased poaching during construction periods due to presence of workers in the area; cutting of trees or natural vegetation as source of materials for the schools; construction ditches that can affect local fauna; fires caused by the burning of trash, among others.

The ESMF has addressed potential direct, indirect and cumulative impacts and has applied the mitigation hierarchy to defined measures to protect and reduce impact on ecosystems (natural and critical habitats) and biodiversity, and support preventive and mitigation measures. The project team will screen the proposed construction locations to prevent construction within critical habitats. Mitigation measures includes small forest restoration of nearby areas using native species that could be affected by clearing the construction site, to improve degraded landscape and provide shade for the schools and increase biodiversity presence (birds, bees) in the area. No invasive alien species are expected to be introduced by the project.

Human and domestic animals (cows, goats, dogs, etc.) and wildlife conflict will be present in different locations and these could be minimized by installing fences at the schools (many schools directors consulted requested fences not only to avoid animal conflict but for girl's safety). However, some schools' properties are very large and the government would need to consider to include the cost of fences in the construction budgets, as these are not currently part of the standard unit cost of schools.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The Project will be implemented throughout Tanzania, including in areas where groups who live traditional lifestyles consistent with the definitions in ESS7 are present. These groups include the Maasai, Hadzabe, Akie, Sandawe and Barbaig. The Project will need to consider these groups during sub-project preparation and implementation to ensure equitable access to benefits (notably access to schools, inclusion in tracking systems and alternative education pathways through site and interventions selection) to avoid exclusion and to avoid any negative impacts on their way of life including as a result of siting of facilities. These groups are considered more vulnerable to negative impacts associated with the Project development. Children belonging to these groups, especially pastoralist communities, may be less likely to participate in mainstream education or alternative education pathways and while this project focuses on secondary education, efforts should be made to avoid their exclusion both currently (recognizing that many children will not have completed primary education) and in the future. A Vulnerable Groups Planning Framework has been prepared to guide the identification of these groups, the development of VGP where needed as well as Free Prior and Informed Consent if required. The VGPs will be developed by the LGAs supported by the national project environmental and social specialists. However, the capacity of the LGAs to develop such plans is very limited as is their knowledge of the requirements of ESS7. Training of the LGAs will need to be provided along with close support from the national team to produce these instruments which will need to be cleared by the Bank prior to implementation. If the VGPs are not developed appropriately the potential for discontent between the Vulnerable Groups and the sub-project could be exacerbated.



ESS8 Cultural Heritage

Tanzania is rich in archeological, paleontological and cultural heritage which include ruins such those of Kilwa Kisiwani and Songo Mnara, archaeological sites in conservation areas such as in Ngorongoro, Serengeti and Selous; petroglyphs of the Singida and paleontological sites such as the Olduvai Gorge. In some areas of Tanzania it is common to find archaeological materials scattered on the floor such as potshards, bones and lithic artifacts.

The construction of new schools may have an impact on cultural heritage including disruption to/ loss of locally important sites (including those belonging to vulnerable groups) or as a result of previously unknown archaeological or historical sites, graves or community sacred or cultural sites, depending on the location of the school.

Impacts to cultural heritage will be addressed through the ESMF including site screening to avoid impacts to cultural heritage including locally important sites. Stakeholder engagement will be undertaken to gather any local knowledge on the presence of cultural sites. A Chance Find Procedure has also been included in the ESMF. During excavations and extraction of construction materials the project will be careful to avoid direct or indirect impacts to cultural resources and the chance find procedure includes measures to implemented in case of unexpected discoveries. Site specific Environmental and Social Management Plans will include provisions for a chance finds procedure.

ESS9 Financial Intermediaries

The Project will not involve the use of financial intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
Establishment of an organizational structure including consisting of the Senior Management Team (co-chaired by the Permanent Secretaries of PO-RALG and MoEST) and the Project Coordination Team who will provide technical and operational support to the Regions and the LGAs as needed.	04/2020
Designation of environmental and social experts within the national Project Coordination Team for SEQUIP including a full time Environmental Expert (1) and a full time Social Expert (1) and a GBV Specialist (1) supported by 5 national environmental and social focal points	04/2020

Public Disclosure



Public Disclosure

Training of staff at the regional and LGA level who will be required to develop environmental and social instruments in line with national legislation and the ESF as outlined in the relevant safeguard's instruments. This will include the development of training materials, capacity building workshops and on the ground support. This training will be provided by the national environmental and social team for the Project.	10/2020
Establishment of sub-project implementation teams at national and district level responsible for all environmental and social matters including the development of the ESIA, ESMP, VGP and RAP as required. These teams need to be provided with training (as outlined above) and have the capacity to apply the ESF instruments and supervision procedures for the Project.	04/2025
The Environmental Expert will ensure that all sub-projects are subject to an ESIA and /or ESMP in line with EIA national regulations and agreements with NEMC and with the ESF to identify and assess risks, impacts and appropriate mitigation. These will be developed in line with the requirements of the ESMF.	04/2025
The Environmental and Social Experts will jointly ensure that for each sub-project the following plans and tools will be developed, ESMP, VGP and RAP where relevant and that there has been a comprehensive program of stakeholder engagement in line with the requirements of the SEP.	04/2025
The Government will include in the project operational manual an Environmental and Social safeguards section and describe the roles and requirements of the environmental and social safeguards team, environmental and social clauses to be included in Terms of reference, tender documents and works contracts, code of conduct for contractors and monitoring requirements and timeframes and minimum building/construction standards acceptable to the Bank for SEQUIP to ensure safety and universal access.	04/2025
A capacity assessment of the LGAs will be performed at early stage of project implementation to tailor environmental and social support through hired consultants and capacity building needs on the ESS instruments and relevant topics to support effective environmental and social management of the project according to the World Bank Environmental and Social Framework.	04/2021
ESS 10 Stakeholder Engagement and Information Disclosure	
An SEP has been developed, the Government will implement the measures included in the SEP and update it through implementation.	04/2025
Grievance Mechanisms have been developed that will be implemented for each sub-project and monitored accordingly.	04/2025
ESS 2 Labor and Working Conditions	
The Government will ensure that contractors implement Occupational, Health and Safety (OHS) measures as outlined in the ESMF/ project implementation manual and that workers have access to medical insurance.	04/2025



ToR for contractors will include labor requirements consistent with national law and ESS2, a code of conduct and a requirement for workers to be made aware of the same and be provided with contracts.	04/2025
The Government will ensure that Project workers can access the grievance mechanism	04/2025
ESS 3 Resource Efficiency and Pollution Prevention and Management	
The ESMF includes measures to prevent pollution during construction and operation; building standards for SEQUIP has been described in the ESMF and will further detail in the POM to increase safety, reduce the use of wood, and hazardous substances.	04/2020
An environmental education program will be implemented with communities and schools to promote better solid waste management in the operational stage and to reduce pollution from science classes, burning of solid waste, water pollution, among others.	04/2025
ESS 4 Community Health and Safety	
The ESIA and / or ESMP will include measures to protect community health and safety consistent with the requirements in the ESF and ESMF, including traffic accidents, disease transmission and GBV.	04/2025
The Government will prepare and implement Emergency Response Plans (ERP) in line with the ESMF. The ERP will document the government’s emergency preparedness and response activities, resources, and responsibilities during construction and operation.	04/2025
The Government will undertake community education and awareness campaigns during construction and operation covering issues such as road traffic movements, safety walking in construction areas, water pollution, disease transmission, etc.	04/2025
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
Each sub-project will undertake screening to determine if resettlement will result from the sub-project as per the ESMF screening process.	04/2025
A RAP will be prepared for each sub-project in the event of physical and/ or economic resettlement cannot be avoided. The RAPs will be guided by the requirements in the RPF.	04/2025
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
The ESMF includes measures to screen, protect and restore natural habitats that might be affected by the project and avoid construction in critical habitats consistent with processes & measures described in the ESMF and national regulations	04/2025
The government will use only native species in restoration activities and will not introduce invasive species, except if these are common fruit trees.	04/2025
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	



Each sub-project will undertake screening to determine the presence of or potential impacts to one or more of the VGs which have been identified in the VGPF.	04/2025
Where, VGs are present a VGP will be developed in line with the requirements of the VGPF including FPIC as needed.	04/2025
ESS 8 Cultural Heritage	
Each sub-project will be screened to avoid impacts to cultural heritage based on the location of the school. LGA, school construction committees and contractors will received training on ESS8 to prevent excavations to impact cultural resources.	04/2025
The Government will develop and implement a Chance Finds Procedure. "Chance finds" clauses will be included in all works contracts, even in cases where such finds are unlikely	04/2025
ESS 9 Financial Intermediaries	

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

The project will comply with the World Bank ESF and the Tanzania regulations on the relevant areas of the project (environment, social, land, water, pollution, labor, cultural resources, among others).

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Finance and Planning

Implementing Agency(ies)

Implementing Agency: President's Office, Regional; Administration and Local Government

Public Disclosure



Implementing Agency: Ministry of Education, Science and Technology

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Cornelia Jesse, Samer Al-Samarrai
Practice Manager (ENR/Social)	Robin Mearns Cleared on 28-Nov-2019 at 13:29:39 EST
Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Concurred on 28-Nov-2019 at 15:49:35 EST