



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 05/24/2019 | Report No: ESRSA00126



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Sierra Leone	AFRICA	P167897	
Project Name	Sierra Leone Free Education Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	6/6/2019	7/25/2019
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Ministry of Basic and Senior Secondary Education		

Proposed Development Objective(s)

The project development objective (PDO) is to strengthen system accountability and increase the number of children in schools with improved learning conditions and better teaching practices.

Financing (in USD Million)	Amount
Total Project Cost	90.37

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]

The proposed Free Education Project is well-aligned with Government priorities and strategies. It is aligned with the main objectives and focus of the Education Sector Plan 2018-2020 as well as the National Development Plan 2019-2023. Specifically, the project was designed in close collaboration with the Government and development partners and to support the Government’s flagship Free Quality School Education (FQSE) Program – with an aim to ensure that free quality education can be provided to all children in the short- and longer-term. The project’s focus also corresponds to the emphasis of the World Bank’s Country Assistance Strategy with regard to its emphasis on the importance of investing in human development. It also integrates key priorities from the draft Country Partnership Framework (CPF) (to be delivered in mid-2019), particularly one of its two pillars, which focuses on human



development and specifically on investments to support decentralized delivery of social services and primary education.

The project is a US\$ 70 million IDA grant over the period 2019 to June 2024. Additionally, U.K. Department for International Development (DFID), Irish Aid and European Union (EU) are expected to provide approximately US\$20 million for the project through a Multi-donor Trust Fund (MDTF). The project will be executed through the Investment Project Financing (IPF) instrument. The Project Development Objective (PDO) is to strengthen system accountability and increase the number of children in schools with improved learning conditions and better teaching practices. The project's main implementing agency is the Ministry of Basic and Senior Secondary Education (MBSSE). Activities supported under the proposed project aim to address system- and school-level challenges facing the education sector building on successful activities and approaches supported under the on-going Revitalizing Education Development in Sierra Leone (REDiSL) Project and existing research on effective approaches in Sierra Leone and in other settings.

The proposed project will comprise five components. Component 1 – Policy, Governance, Accountability and System Administration; Component 2 – Teacher Management and Professional Development; Component 3 – School Level Education Development; and Component 4 – Program Management, Coordination and Monitoring and Evaluation. Component 5 – Contingent Emergency Response Component (CERC). Component 1 aims to strengthen the education system in areas of policy, governance accountability, and administration for enhanced quality of education services. It will support policy and implementation coherence across the primary and education sub-sectors and promote strategic initiatives at the country level. Component 2 seeks to address the critical teacher quality and teacher management issues that limit teaching and learning in the country. Component 3 aims to improve the quality of education and the teaching and learning environment by addressing school-level needs. Component 4 will support the management of the project, as well as coordination and monitoring and evaluation (M&E) aspects. Component 5 is a Contingent Emergency Response Component (CERC), which allows for rapid reallocation of project proceeds in the event of a natural or artificial disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact.

Public Disclosure

D. Environmental and Social Overview

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

The Project will be implemented nationwide in both rural and urban areas. The environmental and social (E&S) contexts will therefore differ among the specific project locations and subprojects. The project is planning to finance school constructions and rehabilitations. It will support construction of 800 additional classrooms to replace makeshift and unsafe classroom in primary and Junior secondary schools including boarding schools for girls. School renovation/rehabilitation grants will also be provided to 1840 primary schools to support schools in conducting minor rehabilitation. Schools rehabilitation works are expected to be limited on schools existing locations and the likelihood of land acquisition is minimal. The criteria for selections for the construction will be based on Annual School Census data but the targeting will consider (a) schools with considerable enrolment but which have only makeshift classrooms, (b) schools with big enrolment and high pupil class ratio, and (c) big primary and secondary schools that require maintenance. The criterial for the renovation will however be based on the School Improvement Plan (SIP) developed by the School Management Committee (SMC). At this stage of appraisal, the specific project locations for additional classrooms have not yet been identified. Assessment of schools based on the criterial indicated above has yet to be done. This will be completed before the exact schools and sites can be determined. The project



implementation will be guided by the requirement of the ESF and Environmental and Social Standards of the World Bank. Given that the specific impact locations of the project are not yet known at appraisal, the Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) have been prepared. The ESMF and the RPF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. These instruments will guide the implementing agencies to identify, assess and mitigate the environmental and social risks and impacts associated with each sub project. The two instruments have also outlined the institutional measures to be taken during the preparation and implementation of the relevant ESSs, including capacity building activities.

Preliminary screening of GBV risk using the World Bank’s corporate GBV Risks Assessment Tool, points to a moderate risk scenario. Labor Influx is expected to be low as the contracting structure will promote the use of local workers from the project vicinity. However, considering that, the project’s civil works will mainly be undertaken within school premises with close proximity of workers to school children and staff, potential incidence of sexual interaction between workers and minors can add additional GBV risk to the project area. Increased transactional sex due to higher wages for workers in low income communities and search for jobs and procurement opportunities from the project could provide grounds for sexual harassment and exploitation of girls and women. The high contextual GBV risk in Sierra Leone (more than half of women and men age 15-49 having experienced physical violence at some point since age 15) and weak legislation to address sexual harassment and Domestic Violence, points to the need to protect school children and the local communities from potential sexual exploitation and abuse by contractors. Apart from GBV risk stemming from civil works, school related Gender Based violence (SGBV), including sexual harassment and sexual assault, teenage pregnancy (with 29 percent of out-of-school girls excluded from secondary schools), early forced marriages are some of the critical factors for increased girls school drop-out in Sierra Leone. The project has included complementary measures to mitigate GBV risks and impact in accordance with the World Bank Good Practice Note on managing GBV risks related to civil works. component 1.7 is dedicated to financing some activities relevant to addressing school related GBV including inclusion of specific modules in teacher training focusing on gender-related issues (including prevention and reporting of SGBV and SEA), school infrastructure and renovation to include additional sanitary facilities with special attention to girl’s safety, establish/strengthen a mechanism for GBV reporting and referral in schools etc.

Children with disabilities often have limited access to schooling and have lower completion and retention rates than children without disabilities. In the 2018 ACS, nearly 30,000 students in the four levels of education in Sierra Leone are children with disabilities. This represents 1.5 percent of total school enrollment. With 10 percent of countries populations estimated to be persons with disability, the results insinuate that many children are kept at home and not captured in available surveys. Keeping in mind Sierra Leone’s FCV context, many more children, women, and people of all ages will experience significant range of disabilities than would be found in a comparable area that has not undergone these impacts. Several barriers impede the participation of children with disabilities in school, including long distances to school, limitations in the school infrastructure and lack of adapted materials, lack of assistive devices, limited teacher knowledge on how to promote an inclusive education environment, and stigma. When in school, they are more likely to experience violence. The project has considered specific interventions under component 1.7 to enhance access and learning environment for children with disabilities.



D. 2. Borrower’s Institutional Capacity

MBSSE is the implementing entity and will provide overall administrative oversight and coordination for the project. The technical aspects of several components of the project will be executed by other ministries and agencies especially the Local Councils (LCs) and the School Management Committees (SMCs). These entities will play leading roles in the day to day supervision of the projects at the local levels. The MBSSE has no existing environmental and social management system and procedures in place. There is no role for safeguards officers as the MBSSE is structured now. However, the local councils have environmental and social officers, but they have no experience implementing the ESF either. In light of the requirement to address issues of Gender Based Violence and other corporate commitments, the Human and logistical capacity within MBSSE to ensure effective implementation and monitoring is currently non-existent. The task team conducted a more structured institutional capacity assessment to support the Government team to support E&S capacity enhancement. The assessment revealed that the environmental and social officers and engineers at the local councils are not mobile enough to effectively supervise/monitor for compliance with the requirement of the ESF. There is the need to put in place standard E&S checklist for use by the Environment and Social Officers in the field for monitoring and supervision at the various project sites. In addition, high staff turnover was reported among the Councils surveyed as part of the capacity assessment.

The project will recruit an environmental and social specialists to be based at the project secretariat and will be responsible for the project environmental and social safeguards implementation. The project will support the development of environmental and social management system for MBSSE to comply with ESS1 requirements. The project will also use a specialized NGO to support the implementation and supervision of GBV mitigations measures. Training for the safeguards officers on the new ESF is recommended and included in the ESCP. Estimated budget for E&S implementation, training and capacity building activities, monitoring and supervision and shall be reflected in the project PAD. The SL EPA as the regulatory agency has experience in the application of the existing World Bank Safeguards Operational Policies and a good number of experienced safeguards specialists. However, the agency does not have any experience in the application of the new ESF and will just like the MBSSE, need support to build their capacity in the expanded scope and application of the ESF.

Public Disclosure

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

A. Environmental and Social Risk Classification (ESRC) Moderate

Environmental Risk Rating Moderate

The potential environmental risks are associated with the civil works especially under subcomponent 1.2, which includes the construction of new classroom blocks, boreholes, sanitary facilities, and maintenance/renovation works for a selected number of schools throughout the country. It is estimated that the the project will support construction of new classroom blocks, sanitary facilities, and maintenance/renovation works for a selected number of schools throughout the country. However, these physical improvements and expansions of school infrastructure will be limited within existing school compounds, hence loss of vegetation and faunal habitat will be minimal.



The environmental risk classification is moderate because the project which entails the construction activities will likely generate minimal adverse impacts that will be site specific, limited to the immediate surroundings and can be managed through the implementation of cost-effective mitigation measures. The key environmental issues that can be anticipated at this stage are related to: (i) nuisances related to air and noise emissions; (ii) health and safety of students, teaching staff and visitors during the construction phase; (iii) disposal and management of construction waste; (iv) traffic management; (v) occupational health and safety of workers; (vi) community health and safety. (v) erosion from earth works and run-off, and (vii) impacts on water quality and quantity etc. Guidance regarding how to manage these impacts and measures for how to mitigate them are included in the ESMF and reflected in the ESCP.

Social Risk Rating

Moderate

The Project Social Risk is rated as Moderate. The project will support the construction and rehabilitation of school buildings/works. It is expected that, existing school or government lands will be used to support construction in order to minimize land take and potential displacements. In many cases however, unused or underused state land is subject to occupation, sometimes by “squatters” and mostly undocumented. The utilization of state land may therefore impact on livelihoods with potential for dispute over land ownership. Land access need to be identified through proper due diligence and appropriate mitigation measures. The risk of GBV has also been rated as moderate using the World Bank’s standard GBV risk assessment tool. Some critical considerations include the proximity of workers to school children and staff that could increase sexual interaction between workers and minors. Higher wages for workers in low income communities and search for jobs and procurement opportunities from the project could provide grounds for sexual harassment and exploitation of girls and women. Other forms of GBV including sexual harassment and sexual assault, physical assault or punishment, teenage pregnancy, early marriage have been key factors for girls school drop out in Sierra Leone which also warrants attention to ensure project does not exacerbate these risks. Complementary measures has been incorporated to prevent and respond promptly to cases in the event they arise. The project has also considered the risk of exclusion of persons with disabilities owing to inaccessible school infrastructure and lack of adapted materials, lack of assistive devices, limited teacher knowledge etc. Without consideration for disability-related needs and support, the project design may indirectly exacerbate this exclusion. The project has undertaken several interventions within the project scope to enhance access to school for children with disabilities.

Public Disclosure

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:

The Project will make use of this standard to assess and manage environmental and social risks and impacts. The project environmental and social risk rating considered the potential risks and impacts associated with the infrastructure development as well as the capacity of the client to implement the requirement of the World Bank Environmental and Social Standards. The nature of the anticipated risks and impacts under component 1.2 are not adverse given that the physical work are not complex and will be limited to existing school compounds. It is not envisaged that any natural or sensitive habitats will be affected by the works. However, since the works will occur



during school hours when lessons are taking place and young children are exposed to construction hazards, strict supervision and adherence to the Sierra Leone Environmental Protection Agency (EPA) and World Bank Environmental and Social Standards, including the health and safety guidelines for construction, are required during the implementation of the project.

The expected influx of workers is also expected to be minimal and a worker's camp is not anticipated. The contracting structure will promote the use local workers from the project vicinity. The likely labor risk may include health and safety of workers, poor labor working conditions, grievances over recruitment process and selection, and protection of female workers. A Labor Management Procedure has been prepared as part of the project ESMF. The contractor is expected to update this into a plan and establish a workers complaints mechanism during implementation. In spite of the minimal labor risk, the proximity of workers to schools may give rise to potential incidence of sexual interaction between workers and minors and can add to GBV risk in the project area. Higher wages for workers in rural poor communities can increase the risk of transactional sex. It is also expected that search for jobs and procurement opportunities from the project could provide grounds for sexual harassment and exploitation of girls and women. The risk of GBV risk was assessed using World Bank's corporate GBV Risks tool which points to a moderate risk score. Measures to minimize and respond to GBV risks and impact from the construction will be done in accordance with the World Bank Good Practice Note on addressing GBV risks related to civil works. This will include (a) Assessing GBV risk as part of the the project's Environmental and Social Impact Assessment (b) all bidding documents for works and procurement contracts will include clear requirements and expectation for a Code of Conduct that prohibits sexual harassment and exploitation and training of workers on their obligations under the CoC. The contractor will as well prepare a costed GBV Action Plan as part of the contractor ESMP. (c) a local NGO will be identified and partnered to assist in GBV response including supporting the design of a GBV sensitive GRM, training and awareness raising on GBV for the local communities and MBSSE, ensure that care seeking behaviors and knowledge of how and where to report GBV cases are known and support survivors to receive appropriate support services (medical/physical-social counseling and legal aid as agreed with the survivor).

The project's social assessment also identified school related GBV and inaccessible school infrastructure, lack of adapted materials, lack of assistive devices, limited teacher knowledge on how to promote an inclusive education environment, and stigma as barriers that restricts Girls and persons with disabilities from accessing education. Plans for enhancing gender and social inclusion has also been considered under Component 1.7 to finance both school- and system-level interventions to promote gender equality and disability inclusion in education. This will among others include the establishment/strengthening of mechanisms for reporting SGBV at the community level and develop a platform for effective response, including financing to strengthen key support and health services and establishment of a strong referral mechanism. All school infrastructure will be disability accessible and in-service teacher training will include modules on GBV and disability issues

the project is expected to use school or government lands to support the school infrastructure development. While this will minimize acquisition of private lands, in many cases, unused or underused state land are subject to occupation, sometimes by "squatters". Mostly, government acquisition is not properly done or undocumented. ESS5 provide the appropriate mitigation measures to be followed to avoid any impact on livelihoods and disputes over ownership and boundary demarcation.



As the exact location of the civil works are not known at this stage, an ESMF and RPF have been prepared. The ESMF will provide guidance on screening for potential risks and on managing unavoidable environmental and social impacts when sub-project locations are identified. ESIA's and RAPs will be prepared as required following the screening results during implementation. The ESMF made use of the general and sector-specific EHSs in relation to occupational and community health and safety and includes a Labor Management Procedure. It also includes a generic Environmental and Social Management Plan with general mitigation measures during construction and operational phases. It includes roles and responsibilities, time plans, costs and implementation agencies for each mitigation measures. This generic ESMP will then be adaptable for specific schools as they become identified during project implementation. Contractors will be required, as a condition of their contracts with the Project, to implement and comply with the generic ESMP, including preparing constructor's Environmental and Social Management plans (C-ESMP). The Contractor will also be required to prepare a GBV Action Plan and update the Labor Management Procedure into a Plan as part of the C-ESMP. The ESCP set out the substantive measures and actions that will be required for the project to meet environmental and social requirements over a specified period of time. These measures shall be implemented within the specified timeframes and the status of implementation will be reviewed as part of project monitoring and reporting.

ESS10 Stakeholder Engagement and Information Disclosure

The project's stakeholder's engagement plan aims at creating a "social licence" and will depend on mutual trust, respect and transparent communication between the project and its stakeholders. It is geared toward improving decision-making. It is key to the success and sustainability of the project development objectives. In consultation with the Bank team, the MBSSE has prepared a Stakeholder Engagement Plan (SEP). The SEP outlines the key stakeholders and the approaches that will be used to consult with them including consideration for needs of vulnerable and disadvantaged groups (teachers, pupil/ students with disabilities etc) to ensure their participation. During preparation, the project held several consultations with MBSSE, teachers, parents, School Management Committees, Local councils, NGOs including disability and Gender groups to inform an inclusive project design (Please see SEP for details). The SEP also present a comprehensive list of the direct stakeholder and stakeholders with other interests and the different engagement mechanisms that will be used to ensure effective consultations. The SEP includes comprehensive M&E arrangement to monitor the SEP implementation and mechanism for Grievance and complaints redress. The SEP is a living document and will be reviewed during implementation. Major revisions to the SEP during implementation will be publicly disclosed.

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 footprint is envisaged to be relatively small and may not likely entail a large scale of skilled and unskilled labor influx. The contracting structure of the project is to mainly use local labor residing within the communities, and it is expected that there would not be a need for the establishment of workers' camps and international migrants. The likely labor risk may include health and safety of workers during the construction and operational phases, general labor working conditions, community grievances over recruitment process and selection, and protection of female



workers, school children and local communities from GBV risks. The ESS2 requires MBSSE to promote sound workers management relationships and enhance the development benefits of the project by treating workers fairly and by providing safe and healthy working conditions. The project has included labor management procedure as part of the ESMF. The contractor will be required to update the Labor Management Procedure into a Plan during implementation and comply with its requirement. The contractor will also be required to establish a worker's GRM to address employee complaints and grievances.

Occupational Health and Safety (OHS): To ensure health and safety of workers during the construction and operational phases of the project, MBSSE will develop and implement a Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities). The plan will include procedures on investigation and reporting of incidences and non-conformances, emergency preparedness and response procedures and continuous training and awareness to workers. The task team will ensure that MBSSE is also familiar with the safeguards incidence response toolkit (SIRT) as a guide to report and manage incidents should they occur.

ESS3 Resource Efficiency and Pollution Prevention and Management

The overall level of environmental risks associated with the project is moderate. However, the following specific aspects in relation to ESS3 will be considered. Vegetation and soil loss: Loss of vegetation and faunal habitat will be minimal. Project physical activities are limited to improvements and expansions of school infrastructure within existing school compounds, the areas are already modified hence degradation because of additional infrastructure will be negligible. Required building material will potentially include stones, sand, concrete blocks and timber. Borrow material will be obtained from already existing and licensed borrow pits within Sierra Leone and possibly close to the project area to reduce the transportation distance. Should there be the need to open new borrow pits, the project shall ensure that all national regulations and assessments and permitting requirements are adhered to and pits reinstated as may be required through the ESMP. Air emissions: Air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are school children, teachers, and people living in close to the construction sites. Mitigation measures such as dust suppression, vehicle maintenance etc will be applied to minimize the impacts and residual impacts are expected to be limited in scope and duration. Noise: Noise will likely be generated from use of construction machinery and vehicle movements. The relatively short-term and small-scale nature of the works suggest that noise levels will not be excessive. Construction works will be scheduled to take place during school vacations to limit the impact on children and persons in the schools. Waste management: Liquid and solid waste will mainly include excavated soil, oils from construction machinery, concrete blocks, metal and glass pieces from demolished walls etc. Waste will be segregated, stored and disposed at approved sites.

ESS4 Community Health and Safety

Since the project's civil works will mainly be undertaken in school's premises, maintaining the health and safety of schools pupils, school staff, vendors, visitors and nearby communities throughout the construction phase is critical. Movement of heavy goods vehicles can lead to accidents. Construction in schools can also disrupt learning through dust emission, noise, increased generation of solid waste, etc. Potential threats to people and communities may be posed by uncovered or barricaded or not signage spots such as excavated sites, trenches, open electric cables, etc.



Children and young people must be protected from potential sexual exploitation and abuse by contractors. School infrastructure must also ensure unimpeded access to all including persons with disabilities. As part of ESMPs, the Project will evaluate site specific Community Health risks and impacts of the Affected Communities during the project life-cycle and will establish preventive and control measures. The project will document site specific emergency preparedness and response activities, resources, and responsibilities as part of the ESMPs and will disclose appropriate information to Affected Communities, relevant government agencies, or other relevant parties. measures will be taken for GBV prevention and response such as including in Civil works contracts, Codes of Conduct to prevent GBV/SEA. The ESCP documents commitment to ensure the contractors prepares a well costed GBV action plans. a local NGO will be identified and partnered to assist in GBV response including supporting the design of GBV sensitive GRM, training and awareness raising on GBV for the local communities and MBSSE, ensure that care seeking behaviors and knowledge of how and where to report GBV cases are known and support survivors to receive appropriate support services (medical/physical-social counseling and legal aid as agreed with the survivor). The project under component 3.3 will also finance the establishment/strengthening of mechanisms for reporting SGBV at the community level and develop a platform for effective response, including financing to strengthen key support and health services and establishment of a strong referral mechanism.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Component 3.2 will involve the construction of School Infrastructure including construction of new and rehabilitation and maintenance of classrooms blocks, Water, Sanitation and Hygiene facilities etc. The project is expected to use school or government lands, in many cases, unused or underused state land is subject to occupation, sometimes by “squatters”. The utilization of state land may therefore impact on livelihoods that will need to be identified through due diligence and appropriate mitigation measures. It is also frequently the case that government acquisition is not properly done or undocumented which can result in disputes over ownership and boundary demarcation. ESS 5 is applied to the project. The project has prepared a Resettlement Policy Framework (RPF) since the specific impact location are unknown at this moment. The RPF establishes the general principles and procedures to be followed in circumstances where construction and rehabilitation activities will cause temporary or permanent physical and/or economic displacement. Once the sub projects specific impact locations are defined and the necessary planning information becomes available, a location specific Resettlement Action Plan (RAP) will be prepared proportional to potential risks and impacts identified by the screening exercise. No physical and/or economic displacement will occur until plans required by ESS5 have been finalized and approved by the Bank.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project physical activities will take place within existing school compounds, however, the ESMF will provide guidance on screening and instituting mitigation measures to ensure that project activities do not impact negatively on any critical or sensitive natural habitats, especially wetlands or biodiversity and living natural resources. The environmental risk with regard to ESS6 is expected to be minimal. In the unlikely event that significant risks and



adverse impacts to biodiversity and habitats have been identified, a biodiversity management plan (BMP) will be prepared either as a standalone document or as part of the construction ESMP. With regard to primary suppliers, the project will establish system and verification practices (certification, licensing, permitting, etc.) to ensure that project goods or materials are sourced from sustainably managed areas.

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

This ESS is not relevant in the project area. There are no known Indigenous Peoples in the project area.

ESS8 Cultural Heritage

Project activities will take place within existing school compounds and does not envisage any impacts on physical, cultural, and/or archeological sites. However, the project will take cognizance of tangible and intangible cultural heritage sites and items, including potential archaeological heritage within the project’s area of influence. The Project will adopt measures such as undertaking meaningful consultations with stakeholders regarding cultural heritage and implementing basic mitigation measures. In the event of finding features of cultural value during project implementation, ‘Chance Find’ standard procedures developed under the ESMF would be followed.

ESS9 Financial Intermediaries

This standard is not relevant at at this moment as the project will not rely on FI for execution of any part of the project activities.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
N/A	
OP 7.60 Projects in Disputed Areas	No
N/A	

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	
ESMF and RPF have been prepared. The project will screen subproject activities using the screening tool developed under the ESMF and make recommendations on specific assessments to be conducted. The project will develop and implement specific Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs) as required when sub-project locations are known.	05/2020
ESS 10 Stakeholder Engagement and Information Disclosure	

Public Disclosure



The project has prepared a Stakeholder Engagement Plan . MBSSE to provide oversight over the SEP implementation.	05/2019
ESS 2 Labor and Working Conditions	
Labor Management Procedures has been included in ESMF. Contractor will update into a Labor Management Plan during Implementation and ensure its compliance. A worker GRM will also be established to address employee complaints and grievances.	05/2019
ESS 3 Resource Efficiency and Pollution Prevention and Management	
covered under ESMF	05/2019
ESS 4 Community Health and Safety	
Covered under the ESMF and will be further detailed under the ESMP. Considerations include traffic and safety of school children and pupils, teachers and worker as well as GBV Action Plan.	05/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
The Project has prepared Resettlement Policy Framework (RPF). RAP/ ARAP/ LRP will be prepared as required when subproject locations are identified.	05/2020
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
The project will screen subproject activities using the screening tool developed under the ESMF to determine potential biodiversity risks and impacts and make recommendations on specific assessments to be conducted.	05/2020
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
Not relevant	
ESS 8 Cultural Heritage	
Project and contractors to follow Chance find procedure described in the ESMF.	05/2020
ESS 9 Financial Intermediaries	
Not relevant	

Public Disclosure

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 borrowers’ framework will not be used for the project



IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Finance

Implementing Agency(ies)

Implementing Agency: Ministry of Basic and Senior Secondary Education

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager (ENR/Social) Senait Nigiru Assefa Cleared on 24-May-2019 at 17:37:35 EDT