Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Ghana</td>
<td>P164603</td>
<td>Ghana Productive Safety Net Project</td>
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<tr>
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<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
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<table>
<thead>
<tr>
<th>Financing Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
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Proposed Development Objective(s)

To support the Recipient to strengthen safety net systems that improve the productivity of the poor

Components

- Component 1: Productive Inclusion
- Component 2: Labor Intensive Public Works Program
- Component 3: Livelihood Empowerment Against Poverty (LEAP) Cash Grants
- Component 4: Social Protection Systems Strengthening
- Component 5: Project Management, Coordination, and Capacity Building

PROJECT FINANCING DATA (US$, Millions)

<table>
<thead>
<tr>
<th>SUMMARY</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
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<tr>
<td>Total Financing</td>
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<td>of which IBRD/IDA</td>
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<td>Financing Gap</td>
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DETAILS

World Bank Group Financing
Environmental Assessment Category
B-Partial Assessment

Decision
The review did authorize the team to appraise and negotiate

## B. Introduction and Context

### Country Context

1. **Ghana has enjoyed a period of sustained economic growth with significant reductions in poverty.** Since the early 1990s, Ghana has experienced positive rates of economic growth, averaging 4.8 percent between 1993 and 2005, 7.7 percent between 2005 and 2012, and 5.6 percent between 2012 and the present. During this period, the poverty rate (at US$1.90 a day) fell from 47.4 percent in 1991 to 13.6 percent in 2012, which enabled Ghana to achieve the first Millennium Development Goal target of reducing the poverty rate by half. This trend coincided with increasing consumption among the bottom forty percent of the population and little change in income inequality. These positive trends have been attributed to a better-educated labor force, internal migration and increased production of cocoa and other crops.¹

2. **The overall decline in poverty in Ghana masks differences in the speed at which poverty has fallen over time and across geographic areas.** The highest rate of poverty reduction (13 percentage points) was recorded between 1991 and 1998. Since then, even as rates of economic growth have accelerated, the rate of poverty reduction has declined, registering 11 percentage points between 1998 and 2005 and only 4.3 percentage points from 2005 to 2012. These figures show that the growth impacts of poverty have fallen dramatically over time. At the same time, inequality across areas has increased: poverty rates remain above 40 percent in Northern and Upper West regions and the number of poor people has increased in Volta, Northern and Upper West regions, even as these numbers fell in other regions. Poverty rates also vary widely across districts within regions. These regional inequalities are reflected in poorer road networks, less access to markets and services, lower school enrollment rates, and worse health outcomes.

3. **Slowing rates of poverty reduction arise from the way the economy is undergoing structural change.** The economy has shifted from agriculture to services and, to a lesser extent, industry. From 1991 to 1998, agriculture accounted for 42.6 percent of GDP, falling to 21.9 percent in 2012/16, while the share of services increased from 32.4 to 49.8 percent. This shift from agriculture to services has, however, not led to higher earnings as most of these services have relatively low productivity. In rural areas, agricultural activities dominate for the bottom 40 percent of the population and diversification into off-farm activities

¹ This section draws on the Draft Ghana Systemic Country Diagnostic (February 2018)
The agricultural sector is characterized by low-productivity smallholder farming with low yields for staple and cash crops. The northern savannah regions are dependent on rain-fed agriculture, which is increasingly precarious as weather patterns become more volatile due to climate change. These risks are further compounded by unsustainable agricultural practices that have led to reduced soil quality and higher erosion.

4. **At the same time, inequalities in access to basic services across regions and income groups persist.** Only 56 percent of the bottom one percent of households visit health facilities when they get sick, compared to 70 percent of the top 20 percent of households. On nutrition, 25 percent of children in the lowest two quintiles are stunted, compared to 9 percent of children in the highest quintile. Large regional disparities in education outcomes persist: in the Upper West, Upper East and Northern Regions, two thirds of women and nearly half of men have no education, compared to 8.3 percent of women and 2.9 percent of men in the Greater Accra region. Households in the poorest quintile have low access to financial services: only 5 percent have a savings account compared to 23.4 percent for the total population. Among the poorest households, inequalities in access to service and land make women more vulnerable to poverty. Such trends in the structural transformation of Ghana together with persistent inequalities in access to public services suggest that focused efforts, such as those offered through social protection, are required to facilitate the productive inclusion of the poor into the economy.

**Sectoral and Institutional Context**

5. **The Government is committed to promoting inclusive economic growth that reduces poverty and creates job opportunities for all Ghanaians.** The Government’s aim of promoting broad-based economic growth is outlined in the *Coordinated Programme of Economic and Social Development Policies (2017-2024)* which underscores the need to mainstream employment creation in the national development of Ghana. To this end, the Government has prioritized investments in core infrastructure and launched a number of flagship programs that aim to enhance access to jobs, promote entrepreneurship and reduce constraints to growth. These include: Planting for food and jobs; One village, One dam; and One district, One factory. While these initiatives are likely to generate jobs opportunities that are suitable for much of the population, it is unlikely that these will reach extremely poor households, which often experience unequal access to basic services due to low literacy and skills as well as poor health. The proposed project will therefore contribute towards the Government’s aim of improving the livelihoods of extremely poor households by harnessing investments in the social protection sector to support these households to better access services that promote their productivity and improve their access to jobs.

6. **Ghana has made important advances in consolidating its social protection sector by putting in place policies and strategies that rationalize programs and prioritize investments.** The National Social Protection Policy (NSSP, 2016), which built on the 2007 National Social Protection Strategy, has the overall vision of “an all-inclusive and socially empowered society through the provision of sustainable mechanisms for the social protection of persons living in situations of extreme poverty and related vulnerability and exclusion”. This will be achieved by expanding programs, increasing coordination among social protection interventions, as well as improving the management systems of interventions. To this end, the NSSP defines a basket of five flagship social protection interventions: Livelihood Empowerment Against Poverty (LEAP) cash transfer program; Labor-Intensive Public Works (LIPW) program; Ghana School Feeding Program; National Health Insurance Scheme (NHIS); and Education Capitation Grant. In
2013, the Ministry of Gender, Children and Social Protection (MoGCSP) was mandated to coordinate the social protection sector.

7. **Ghana has established flagship safety net programs that have progressively expanded nationwide.** The Livelihood Empowerment Against Poverty (LEAP) cash transfer program started in 2008 with an objective of smoothening consumption for poor and vulnerable households. The number of beneficiaries grew from around 40,000 households in 2010 (start of IDA support; see Box 1) to about 213,000 households in 2018. The LIPW program equally started in earnest in 2010, with an objective of providing short-term employment to poor people during the lean season, while creating productive assets. The LIPW program has supported 166,875 unskilled beneficiaries with over 13 million person-days of labor. The assets created through LIPW have improved the wellbeing of communities and have responded directly to the risks posed by climate change by providing more regular access to water and afforesting (and reforesting) of communal lands. In addition, concerted efforts have been made to link the poorest households to multiple programs. Key among these efforts was the decision by the Government that households participating in the LEAP would receive subsidized access to the National Health Insurance Scheme.

8. **More recently, the Government has introduced reforms and innovations to strengthen the transparency and objectivity of social protection delivery.** Central to these reforms has been the launch of the Ghana National Household Registry (GNHR), which collects data on households to enable their selection into a range of targeted programs through an objective and transparent process. The LEAP and LIPW introduced electronic systems such as e-payments and e-attendance with biometric verification and the MoGCSP initiated a unified case management system. These innovations have increased the efficiency of program delivery by increasing transparency of project activities, improving workflows, including the speed with which payments to beneficiaries were made, and reduced leakages associated with “ghost” beneficiaries. Given these innovations, the next step for the social protection sector is to consolidate these systems so that they are used by all relevant programs and are extended to community level to support better coordinate of services to beneficiaries and further promote transparency and accountability. Extending these systems to communities requires not only the continued innovative use of technology to connect citizens to the systems but also strengthening the knowledge and skills of district-level staff, while supplementing existing human resource capacity with the use of community-facilitators.

9. **The Government’s overall ownership of and efforts to consolidate and harmonize social protection are reflected in its increasing financing to the sector.** The Government has progressively increased its financing to LEAP, reaching 168 million Ghana Cedis (GHC; US$ 37.3 million) in 2017-18. This financing is set within a broad commitment to ensuring the financial sustainability of the flagship cash transfer programs. The World Bank has sustained engagement in the sector through the IDA-financed Ghana Social Opportunities Project (see Box 1). This support has been coordinated with that of other development partners, including DFID, UNICEF, the European Union (EU), United States Agency for International Development (USAID). The Government has thus requested the proposed project to continue this partnership to build on the success achieved in the social protection sector.

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**Box 1: World Bank Support to Social Protection in Ghana.**

The World Bank has contributed toward improving the social protection system in Ghana through the Ghana Social Opportunities Project (GSOP). Initiated in 2010, the IDA-financed US$138.6 million project aimed to improve the targeting of social protection programs and provide income support to poor households through LEAP cash grants.
and the LIPW infrastructure in targeted districts. The project demonstrated strong results, and also supported the preparation of the NSSP, initiation of SP bill, and strengthened inter-ministerial coordination as implementation of the project was undertaken by the Ministry of Gender, Children, and Social Protection (MoGCSP) and the Ministry of Local Government and Rural Development (MLGRD). This support has been coordinated with other development partners, including DFID and UNICEF who have also supported the improvements within the SP sector in Ghana.

10. **The social protection sector is now poised to provide a foundation for jobs and improved access to services for the extremely poor.** This approach rests on the established role of the social protection sector in being able to reach the poorest households, the results that have been achieved to date, and the investments in robust delivery systems. It also draws on international evidence that shows that the impacts of cash transfers can be amplified when complemented with the provision of training, productive grants and coaching to beneficiaries. Ghana has experimented with this approach through a grant funded by the Japanese Social Development Fund (JSDF) that was implemented by the Ministry of Local Government and Rural Development (MLGRD). Accordingly, the proposed project aims to further improve the effectiveness of the flagship programs (specifically LEAP and LIPW) and to complement these with concerted efforts to build linkages to productive support for extremely poor households. This approach is anticipated to address some of the constraints to productivity faced by the extremely poor household while consolidating the gains made in the social protection sector to date.

C. Proposed Development Objective(s)

**Development Objective(s) (From PAD)**

To support the Government to strengthen safety net systems that improve the productivity of the poor

**Key Results**

11. The project’s performance in achieving its development objective will be measured through the following key outcome indicators:
   - Percent of beneficiaries who initiated or expanded a household enterprise.
   - Percent of beneficiaries with a bank account.
   - Average annual earnings of unskilled workers in LIPWs (in GHS)\(^2\).
   - Percent of respondents reporting that the assets created through LIPW improved their livelihoods.
   - Percent of beneficiaries who are identified as extremely poor according to targeting criteria.
   - Percent of payments made to beneficiaries on time (as defined in the Program Operations Manual).

D. Project Description

12. This project will support the Government to provide tailored support to the poorest households to address the demand-side constraints to accessing services that would strengthen their productivity. This support will be sequenced in a manner that reflects (i) the different capabilities of and constraints

\(^2\) This indicator was selected because it was employed in GSOP to track progress towards the PDO and thus provides some insights into long term trends in the World Bank support to social protection in Ghana.
faced by households; and (ii) the geographic coverage of each intervention. For those extremely poor households that can diversify their incomes or improve the productivity of their household enterprises but face constraints in accessing technical skills and financial support, a set of productive inclusion activities will be provided. This will be situated within broader efforts to provide dedicated and coordinated support to help households access agricultural support and strengthen their financial literacy and savings. These investments in the productivity of the household will be directed to LEAP and LIPW beneficiaries given that these programs reach extremely poor households. In parallel, the LIPW component will offer regular seasonal employment activities for extremely poor households. These public works activities will be carried out in a manner that addresses the underlying causes of poverty in these areas, namely soil erosion, declining soil fertility, access to markets (through feeder roads) and access to irrigation. It is anticipated that these assets will directly contribute towards improved agricultural productivity in these areas.

13. The project will also support the Government’s LEAP program, which provides regular cash transfers to extremely poor households nationwide. As the provision of productive inclusion activities to LEAP beneficiaries will move some of these households out of poverty, it is anticipated that LEAP will increasingly include those households who face other binding constraints to strengthening their productivity, including high dependency ratios and chronically ill or disabled household heads. For these households, the pathway out of poverty will be through concerted efforts to build the human capital of these families, particularly to encourage families to keep their children in school and to prepare school graduates to transition into productive work. Based on global evidence, breaking the intergenerational transmission of poverty can be enabled through the regular receipt of a cash transfer together with efforts that aim to help ensure that households invest in the human capital of their children.

14. Finally, the Government aims to consolidate the social protection sector by strengthening individual program delivery systems and further consolidating the building blocks of the SP system. Much has been achieved to date, with support from GSOP. This project will further strengthen, integrate and consolidate these processes into a functional and coordinated SP system that is anchored at the community level. It will also facilitate linkages and feedback loops between individual SP programs and the consolidated SP system to improve information flow on targeting, coverage, case management, as well as key results.

15. The project will support the following components:

**Component 1: Productive Inclusion.** The objective of this component is to support productive inclusion activities for extremely poor households in targeted communities.

**Component 2: Labor Intensive Public Works (LIPW).** The objective of this component is to extend income-earning opportunities to poor households through LIPW, which maintain or rehabilitate assets that improve the productivity of communities and respond to the anticipated effective of climate change.

**Component 3: Livelihood Empowerment Against Poverty (LEAP) Cash Grants.** The objective of this component is to smooth consumption among extremely poor households. This component will complement Government funding to LEAP, which is estimated to reach 168 million Ghana Cedis (GHC; US$ 37.3 million) according to the National 2018-2019 budget estimates.
**Component 4: Social Protection Systems Strengthening.** The objective of this component is to strengthen social protection delivery systems to improve the efficiency, effectiveness and transparency of safety net interventions in Ghana.

**Component 5: Project Management, Coordination, and Capacity Building.** The objective of this component is to support project management, coordination, and capacity building under this project.

**E. Implementation**

**Institutional and Implementation Arrangements**

16. Overall, the project implementation will be undertaken by the Ministry of Gender, Children and Social Protection and the Ministry of Local Government and Rural Development. Within the MoGCSP, the Project Coordinating Unit will be the Social Protection Directorate (SPD). The GNHR unit in MoGCSP will manage the GNHR activities. The Single Window Case Management System (SWCMS) will be managed by the Case Management Unit of the SPD. LEAP will be managed by the LEAP Management Secretariat (LMS) under the MoGCSP. The Project Implementation Unit under the MLGRD shall be the Rural Development Project Coordination Unit (RD-PCU), which will build on the institutional structures and arrangements of the GSOP National Coordinating Unit.

**F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

The safety net programs consist of the LEAP, which is an unconditional cash transfer program, and the Labor Intensive Public Works (LIPW). The LIPW is the component with safeguards implication as it involves infrastructural interventions including small earth dams/ dugouts with accompanying irrigation facilities, climate change mitigation interventions (mainly fruit trees and wood lots); feeder and access roads, and other new sub-project types (models) such as communal farming, among others. The environmental risks and impacts of the proposed sub-projects, particularly under LIPW, are likely to be minimal, manageable, and, in most cases, reversible. Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) have been prepared by the project to address all potential environmental and social risks and impacts. The safety nets (LEAP) cash transfers program to about 350,000 extremely poor covers rural areas and very dispersed. This will require strong monitoring system at the local level. The Labor-Intensive Public Works (LIPW) program will take place in extremely poor districts of Ghana. These extremely poor households are mostly located in Guinea and Sudan savanna agro-ecological zones. These areas are highly degraded and vulnerable to further degradation and desertification due to increasing aridity. The soils are generally very low in fertility and productivity and the area is more susceptible to greater climatic variability.
G. Environmental and Social Safeguards Specialists on the Team

Gloria Malia Mahama, Social Safeguards Specialist
Anita Bimunka Takura Tingbani, Environmental Safeguards Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

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<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
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<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>This policy is triggered because of the potential adverse risk and impacts that may be generated from the public works sub-projects, such as rehabilitation of small earth dams and dugouts, rehabilitation of feeder roads, model communal farming and rehabilitation of tourism sites. These potential impacts are however specific and may include erosion and siltation, dust generation, road safety issues, health related and water borne diseases, and worker and community safety. An ESMF has been prepared to assist the project team to avoid where possible or mitigate any residual impacts during project implementation. The ESMF includes an E&amp;S screening checklist for screening all sub-project as a requirement for sub-project approval.</td>
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<tr>
<td>Performance Standards for Private Sector Activities OP/BP 4.03</td>
<td>No</td>
<td>The project activities do not involve natural habitats</td>
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<tr>
<td>Natural Habitats OP/BP 4.04</td>
<td>No</td>
<td>The project activities do not involve forests</td>
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<tr>
<td>Forests OP/BP 4.36</td>
<td>No</td>
<td>Project activities do not involve pesticides</td>
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<td>Pest Management OP 4.09</td>
<td>No</td>
<td>The possibility of finding evidence of physical cultural resources is unlikely in this project</td>
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<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>No</td>
<td>No indigenous people will be impacted under this project</td>
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<tr>
<td>Indigenous Peoples OP/BP 4.10</td>
<td>No</td>
<td>LIPW is the component with safeguards implication as it will involve public works sub-projects, including earth dams/dugouts, feeder and access roads rehabilitation, communal farming, among others. This could result in land acquisition and induce restrictions to land resources and livelihood. Based on the risk profile, OP 4.12 is triggered. In line with</td>
</tr>
<tr>
<td>Involuntary Resettlement OP/BP 4.12</td>
<td>Yes</td>
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</table>
this policy, the borrower has prepared a Resettlement Policy Framework (RPF) which was disclosed in April, 2018. An RPF is prepared because site location for the sub-projects cannot be determined until at implementation. Follow-up site specific Resettlement Action plans or Abbreviated Action Plans will be prepared as needed during project implementation when sub-project locations are eventually known.

Safety of Dams OP/BP 4.37  No  The project does not involve the construction of Dams as applicable to this policy. Project activities are limited to small earth dams and dug outs as part of the LIPW none of which fit the definition of a Dam requiring this policy.

Projects on International Waterways OP/BP 7.50  No  The project does not involve international waterways

Projects in Disputed Areas OP/BP 7.60  No  The project is not located in a disputed area

**KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT**

**A. Summary of Key Safeguard Issues**

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

   The environmental assessment Category of this project is “B” and the risk is rated moderate. Component 2 of this project will support construction and rehabilitation of community feeder, small earth dams and dug-outs, establishment of fruit tree and woodlot plantations, among others. From the social safeguards side, the design and implementation of these activities may lead to land acquisition and could induce restriction to land resource and livelihoods. From the project assessment and experience from GSOP, the scale of impacts is expected to moderate site specific and easily mitigated with the agreed Environmental and Social (E&S) measures.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

   The potential long-term impacts by large are anticipated to be positive. Project activities will lead to an increase in household incomes for the direct beneficiaries. The established community infrastructures will reduce the level of vulnerabilities during the agricultural slack periods and also minimize youth rural out-migration. The focus on local level planning, selection and execution of sub-project can promote social cohesion which will contribute to ownership and sustainability of the community infrastructure established.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

   Analysis of alternatives will be conducted as part of the sub-project environmental and social impact screening during implementation. The project’s approach is however to avoid impacts on dwellings and livelihoods through identification of alternative site and other technical considerations. Since specific locations and designs are undetermined at this stage, an ESMF and RPF has been prepared and was disclosed prior to appraisal.
4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Based on the risks profile, the project triggers OP4.01 on Environmental Assessment and OP4.12 on Involuntary Resettlement. In order to comply with these policies, the project has prepared an ESMF and RPF since specific locations and designs are undetermined at this stage. The ESMF and RPF provide the framework and guidance for environmental and social due diligence, impact assessments and mitigation planning once the project intervention areas are identified during implementation. The project has made provision of a social and environmental screening for each sub-project. The borrower is required to prepare, publicly disclose and implement sub-project level ESIA s, RAPs as needed prior to commencement of any civil works.

In terms of responsibility, the RD-PCU and SPD have the ultimate responsibility for ensuring successful project implementation including adherence to safeguards measures and compliance. At the national level, safeguards activities will be coordinated by the National Safeguards and Case Management Officer. The RD-PCU coordinator will be supported by 4 Zonal Coordinators and Case Management Assistants. At the district level, the District Engineer and the District Planning Officer (Focal Person) are in charge of safeguards and at the community level, the Client Supervisor, Community Facilitator and Community Facility Management Committee (CFMC) will oversee the day-to-day implementation of activities. The project will also benefit from EPA and Ghana Irrigation Development Authority (GIDA’s) support. The 2017 safeguards audit report of the GSOP, which had a similar institutional structure, assessed among other issues the capacity and effectiveness of safeguards implementation. It was revealed that safeguards due diligence and documentation varied across the RCOs owing to staff turnover. The district and community levels structure for monitoring and implementation was also found to be relatively weak. In view of this, the project has included in the ESMF and RPF provisions to strengthen the capacity for the district and local staff and clarify roles and coordination among the various actors supporting safeguards implementation. The project will also digitize safeguards reports to enhance documentation and reporting.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The ESMF and RPF were prepared in compliance with national regulations and Bank safeguard policies. Their preparation followed a broad participatory consultation process with all relevant stakeholder groups including government entities, the ESMF and RPF were disclosed in-country in April 2018 and at the InfoShop. Because public consultation and participation is an iterative process, the project has a put in place a CE mechanism including a GRM to ensure consultation occurs throughout the project phase. implementation, supervision and evaluation.

B. Disclosure Requirements

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<th>Environmental Assessment/Audit/Management Plan/Other</th>
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"In country" Disclosure
Resettlement Action Plan/Framework/Policy Process

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<td>25-Apr-2018</td>
<td>25-Apr-2018</td>
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"In country" Disclosure

Ghana
24-Apr-2018

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?
Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?
Yes

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?
Yes

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?
Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?
Yes

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?
Yes
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?
Yes

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
Yes

Have costs related to safeguard policy measures been included in the project cost?
Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
Yes

CONTACT POINT

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Senior Social Protection Economist

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APPROVAL

Task Team Leader(s):
Sarah Coll-Black
Christabel Ewuradjoa Dadzie
Suleiman Namara
## Approved By

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Date</th>
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<tbody>
<tr>
<td>Safeguards Advisor:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Practice Manager/Manager:</td>
<td>Iffath Sharif</td>
<td>29-Aug-2018</td>
</tr>
<tr>
<td>Country Director:</td>
<td>Henry G. Kerali</td>
<td>13-Sep-2018</td>
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