



The World Bank

Uganda COVID-19 Emergency Education Response (GPE) Project (P174033)

Appraisal Environmental and Social Review Summary

Appraisal Stage **(ESRS Appraisal Stage)**

Date Prepared/Updated: 07/21/2020 | Report No: ESRSA00839

**BASIC INFORMATION****A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Uganda	AFRICA EAST	P174033	
Project Name	Uganda COVID-19 Emergency Education Response (GPE) Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	7/9/2020	7/27/2020
Borrower(s)	Implementing Agency(ies)		
Government of Uganda	Ministry of Education and Sports		

Proposed Development Objective

The Project Development Objective is to support students learning (pre-primary, primary and lower secondary) during school closures associated with the COVID-19 pandemic and ensure a safe reopening and student reentry.

Financing (in USD Million)	Amount
Total Project Cost	14.70

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

Yes

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

The Project Development Objective is to support students learning (pre-primary, primary and lower secondary) during school closures associated with the COVID-19 pandemic and ensure a safe reopening and student reentry. There are three components to the project. The first component will provide access to resources to ensure that students are learning during the school closure as well as preparation for school reopening. It will focus on reaching the most vulnerable, in particular girls and children with special needs and students in schools in refugee settlements. This component will support design, printing and distribution of self-learning materials to students, and broadcast of lessons via radio and TV. By focusing on creating pathways to access learning during the school closures, the component aims to support and manage continuity of learning which feeds into the second part of this component



which is to support the successful and effective reopening of schools. The second component will support safe re-opening, student re-entry and capacity building for resilience. It will support efforts of the MOES, school leaders and teachers to prepare effectively for the re-opening of schools and the re-entry of students. Even after the lockdown has been lifted, the schools will need to be prepared for resumption of learning. This component will also focus on improving the capacity of key stakeholders to respond to the various emerging needs during and after the COVID-19 outbreak. Finally, the third component is Project Management, Monitoring and Evaluation. This component will provide support to the project implementation, supervision, monitoring and evaluation, procurement and financial management and auditing. It will finance project staff salary, office rent, furniture, equipment, transportation, data collection and analysis, and capacity building.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project aims to mitigate effects of COVID-19 on students and teachers and create resilience to future shocks in the education system in Uganda. The closure of schools due to risks of COVID-19 impacted 73,200 schools and institutions affecting more than 15,100,000 learners and 548,000 teachers. Additionally, the schools closure also affected approximately 600,000 more children who are attending schools in the refugee settlements. Some of these settlements are in high risk towns bordering countries that have reported confirmed cases of COVID-19, increasing the risks for the entire school system in Uganda.

The Project beneficiaries are 14.6 million students in pre-primary, primary and lower-secondary students; and 520,000 teachers and school administrators in Uganda. In Uganda Primary Education lasts 7 years, from ages 6 to 12, and lower secondary education lasts 4 years, from ages 13 to 17. The transition rate from primary to lower secondary was 59 percent in 2016, and the completion rates were 44 and 26 percent for primary and lower secondary education, respectively. The expected outcomes of the project should put in consideration already low transition rate and completion rate.

In the Ugandan context girls suffer extra constraints due to social expectations, for example to take on household responsibilities and domestic chores, and in economically disadvantaged areas, they tend to marry and have children early. Additional barriers to girls' school participation and retention include poverty and high school fees, poor infrastructure and long distances to schools, insecure learning environments and increased exposure to violence and sexual harassment or abuse. Existing gender inequality and social norms combined with the breakdown in economic and social activities and decreased access to services with the escalation of the COVID-19 crisis controls exacerbate GBV/ SEA/ VAC and SH risks.

The activities proposed in this project represent an opportunity to promote gender equality in terms of access and quality to education for all and will support increased awareness related to healthy conflict resolution, parenting, and availability of psycho social services, implementation of the Ministry of Education Service Code of Conduct which includes provisions for SEA/VAC and SH prevention as well as Grievance redress mechanisms and referral pathways for GBV /SEA/VAC and SH cases consolidated in the MoES Reporting, Tracking, Referral and Response (RTRR) Guidelines on Violence Against Children in Schools. The MoES, in the ESCP, will commit to the implementation of the Education Service Code of Ethics and Professional Conduct which includes provisions for SEA/SV prevention.



Persons with disabilities constitute one of the main vulnerable groups at risk of exclusion in the education sector during this crisis. Without consideration for disability-related needs and support, the project may exacerbate this inequality and limit access to quality learning for children with disabilities. The proposed project has identified several entry points to support inclusion in this emergency response plan, such as ensuring text-to-speech options in the e-learning platforms, use of sign interpretation on televised content, and targeting students with disability and girls as a key target group under back-to-school and gender sensitization campaign

The Country is experiencing both protracted and ongoing forced displacement trends with approximately 600,000 children attending schools in refugee settlements. The refugee inflows combined with the existing and protracted refugee situation have put enormous pressure, most especially on the local host community, creating challenges in the delivery of essential services and pressures on existing public service delivery systems and infrastructure. They have also exacerbated a range of ongoing environmental impacts and associated challenges. The project will address any anxiety triggered by competition for the project resources through comprehensive stakeholder engagement and active grievance redress mechanisms.

The presence of Vulnerable and marginalized learners (Batwa and IK) has been seen in earlier Education projects USEEP. In the event that the project area of influence includes these groups, consideration has been made to ensure that the VMGs (Batwa and IK) will access the project benefits in a culturally appropriate manner. However, there is a risk of poor access to disaggregated data in a timely manner and monitoring the continuity of these learner from vulnerable and marginalized groups.

D. 2. Borrower's Institutional Capacity

The project will be implemented by Uganda's Ministry of Education and Sports (MoES) and the overall accountability to the project will rest with the Permanent Secretary, MoES. The MoES will be responsible for the preparation and implementation of Environmental and Social (E&S) instruments, as well as overall compliance enforcement of relevant national health and safety regulations and guidelines. The Ministry currently has one Environment and Social specialist supporting the implementation of a World Bank financed project, 'the Uganda Skills Development Project - P145309", approved under the safeguard policies. The ministry will establish a PCU by hiring previous staff of GPE-UTSEP that closed on March 31, 2020 who already have capacity in implementing GPE project. Although the PCU has substantial experience working on World Bank Group operations and given the unprecedented nature of the COVID-19 pandemic there is limited experience developing and implementing educational activities and safety measures aligned with the physical distancing measures.

Additionally, the Ministry has no previous experience with the World Bank's Environmental and Social Framework (ESF) and does not have the adequate environmental and social specialists in place, institutional capacity is therefore considered weak. The capacity of the Ministry the PCU to manage the environmental and social (E&S) risks will be built through ongoing support and training by World Bank by environmental and social specialists. While in the interim the current one Environment and Social Safeguards Specialist will support the project, the PCU will prioritize hiring at least two environmental and a social consultant specifically for this project. The MOES will hire the project staff by the Board date.



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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

The environmental risk rating is moderate. Although the activities of the project will have positive impacts, the main environmental risks and impacts of the project are health and safety risks posed to the communities, learners and teachers during implementation of certain activities which involve mobilization of teachers, communities including learners in refugee settlements and the reopening of schools. These activities will require that special attention and procedures are in place to ensure schools are ready to safely receive students again. This includes implementing all necessary provisions to minimize the risk of infection or contamination with pathogens. This includes implementing all necessary provisions to minimize the risk associated with infection or contamination with pathogens, sanitation and disinfection of schools, WASH, waste management, community health and safety, and emergency preparedness.

Social Risk Rating

Substantial

The social risk rating is substantial, the main risks of the project is that some learners may not benefit from the broadcasting activities, especially those from the lowest income families who do not have access to television and radio which are the main learning mediums proposed during the COVID- 19 lockdowns. The project proposes to ensure access to all students through printed hard copy learning material as part of self-studying home package. The risk involved is exclusion of learners from remote areas who may not be able to access the Education printed materials or access the materials out of time or inconsistently, delivered through the District, Subcounty, Parish levels and village chairperson to household level. The MOES as of May 2020 distributed about four million self-studying material packages to students. The lessons under that initiative show that in hard to reach areas the Local Council Chairpersons at village level had to distribute the materials to remote households personally. During the distribution of the Education packages and the area Members of Parliament were encouraged to sensitize and inform the communities that the materials are available free of charge. These interventions to inform the stakeholders highlight the risk of limited stakeholder engagement due to the COVID -19 induced social distancing requirements. The proposed method of delivery of resources still needs strengthening and is yet to be validated as effective in terms of prompt access to all. With the existing distribution and access challenges, students from Vulnerable and Marginalized groups are likely to be further disadvantaged. Learners with special needs that may need support to comprehend the language and content used in the study materials may not be able to access this support in time, given the limited availability of specialized teachers/workers Whereas the project will provide materials in Braille as well as recordings on SD cards and interpreters for the television programs some learners with disabilities may not have the technology to access the learning content on the SD cards. Given the 18 months implementation period, not all these risks can be mitigated under this project. However, the project shall track the learners through the e-tracking platform and student registers and strives to maximize the results through specific access indicators disaggregated by gender and vulnerable and marginalized groups. The project offers the opportunity to collect valuable lessons for the sector and future programs.

There is a risk of SEA/VAC due to the exposure of project workers to the communities and the capacity is a risk yet to be assessed. If the materials for distribution are not sufficient and the channels for access and distribution are not clear, the competition for resources and project benefits may expose women and girls to sexual exploitation and abuse, VAC, Sexual Harassment(SEA/VAC/SH). The competition for resources may also cause tensions and resentment



towards already excluded groups like refugees, learners with disabilities and learners from VMGs. Codes of conduct should be signed by all project workers and GRMs and referral pathways be instituted and clearly disseminated. The project workers will include direct, contracted and primary supply workers. Contracted and primary supply workers may be vulnerable to labor abuse and grievances if their working conditions are not clearly documented and there is discrimination in access to opportunities. Occupational health and safety risks will also need to be considered especially for those involved in the delivery of materials to learners. These risks shall be addressed through the Labor Management Procedures that will be developed for the project.

The project will improve coordination and communication among stakeholders such as Ministries at all levels of education, teachers and school leaders and various Community Engagement (RCCE).

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 components aim at minimizing the adverse effects of COVID-19 on students, teachers and creating resilience to future shocks in the education system in Uganda. The activities to be supported by the project generally have low environmental impact and potentially moderate health and safety risks to the communities, learners and teachers in view of activities involving mobilization of teachers, communities including learners in refugee settlements and the reopening of schools. From the environmental, health and safety perspective, the relevant standards are: ESS3 arising from the management of solid waste generated in the schools and wastewater from hand washing facilities in the various locations in the school premises; and ESS4 because of continued risk of disease transmission during mobilization and once schools reopen.

The project will support community sensitization, procurement of hand washing materials as preventive measure for spread of highly infectious COVID-19 disease and establish a system for referral for case management for teachers and learners. Thus, as part of the Occupational, Health and Safety (OHS) measures, it's recommended that the project adopts infectious and prevention control protocol for all schools; include measures on emergency preparedness and response, regular health screening of teachers and learners to ensure safety of the teachers, learners and the community.

An Infectious Control and Waste Management Plan (ICWMP) will be prepared and disseminated to all schools during implementation phase of the project. The ICWMP will compose of:

- (i) Infectious control and waste management measures;
- (ii) Emergency preparedness and response measures
- (iii) Institutional arrangement and building
- (iv) Monitoring and Reporting.



An Environmental and Social Commitment Plan (ESCP) agreed upon with the Bank will also be prepared by the Borrower. The ESCP will set out the substantive measures and actions that will have to be taken by the Borrower to meet environmental and social requirements.

Under component one, the project will ensure learning during school closure through design, printing and distribution of self-learning materials to students, and broadcast of lessons via radio and TV. To promote access to the project benefits, through the project design, lessons via radio coverage (most widely used) will be repeated, communication of the learning sessions will be done via SMS and through media campaigns and through robust stakeholder engagement. This component will focus on reaching the most vulnerable, in particular girls and children with special needs, disabilities and students in schools in refugee settlements. There are risks of exclusion of the same vulnerable groups which may not have access to Radio and television as the project will not provide televisions, radios.

Under Subcomponent 1.1, MOES will provide self-learning packages and distribute them through the District, Subcounty, Parish systems to Local Council Chairpersons at Village levels . There is a risk of GBV, SEA, SH and VAC due to the exposure of project workers to the communities and the capacity to reach all the homes of the learners is a risk yet to be assessed. The project will improve coordination and communication among stakeholders such as ministries at all levels of education, teachers and school leaders and various community leaders to facilitate the delivery and access systems and support community sensitization by creating a strategy for Risk Communication and Community Engagement (RCCE).

Under subcomponent 1.2: Print and self-study home packages will be adapted into large print and braille for students with special needs; (ii) Radio live recorded lessons and live presentations which will be placed on SD reader cards and memory cards for students with special needs; and (iii) Television- lessons which will make use of interpreters for students with hearing impairment. There is a risk of exclusion of the target groups may not have the necessary technology such as SD card readers to access the special learning packages.

Subcomponent 2.1. The Ministry will develop Standard Operating Procedures and provide Psycho-social support, safety and security of students and coordination with various stakeholders when the schools reopen. Training for school administrators, teachers will be conducted. Information on training and availability of Psychosocial services will be included in the stakeholder engagement plan. To ensure that project workers are not made vulnerable by the project or create a negative impact in the project area, and LMP will be prepared for the project and a worker's grievance management procedure instituted. GBV/SEAH risk would also need to be assessed when the schools reopen.

This subcomponent (2.1) further provides for Establishment of remedial (catch-up) programs for girls at risk to prevent students, from dropping out of school through remedial programs and activities through teachers, community members, parents and Local Government and School General Assembly Committees. Monitoring, intervention and psychosocial support as well as "Back to School" and awareness building campaigns for girls and children from vulnerable populations. There is a risk of lack of comprehensive records for individual students to facilitate the follow-up of students, the records of VMG learners may be hard to access and the campaigns may not reach the VMG communities. The project will support Local Council authorities to develop village registers of school



going children for monitoring continued learning, school attendance, learning assessment through a customized e-platform for tracking of learning - Learner management system (LMS) provisioned under Component 2.2.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. In consultation with the Bank, the client has prepared and implement an inclusive Stakeholder Engagement Plan (SEP). It will ensure the appropriate representation and participation of various groups of stakeholders, including women, children, persons with disabilities, linguistic minorities, the elderly and other vulnerable groups. Particular efforts will be made to reach parents and families in remote communities, as well as religious leaders and community leaders, in order to inform a plan to transmit messages on healthy conflict resolution, healthy parenting, stress and anger management, and family and community support to children accessing distant learning.

In the context of infectious diseases, broad, culturally appropriate, and adapted awareness raising activities are particularly important to sensitize communities to the risks related to infectious diseases. The Borrower will engage in meaningful consultations on policies, procedures, processes and practices (including grievances) with all stakeholders throughout the project life cycle, and provide them with timely, relevant, understandable and accessible information. A project-wide Grievance Mechanism (GM), proportionate to the potential risks and impacts of the project, will be established based on existing structures and lessons learnt from earlier projects. This will include a GM that is accessible and that students (including those with disabilities) living in quarantine situations have appropriate means to access. The SEP has been prepared and includes measures to ensure effective and appropriate communication about the presence and mandate of the GM. Communication on the access to the GRM will be made especially to children and other vulnerable groups, in accessible formats and appropriate languages. The SEP has been prepared in line with the guidance provided by the Bank related to public consultation note for projects under COVID. The draft SEP has been prepared to be disclosed as early as possible, prior to appraisal of the project. An updated SEP shall be prepared within one month of effectiveness of the project.

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 proposed project will be implemented by the Ministry of Education through personnel that were engaged by the MOES under the UTSEP project that closed on 31st March 2020. The project workers include direct workers, contracted workers and primary supply workers.

Direct workers will include the PIU (formerly of the UTSEP project), schoolteachers and school administration as well as civil servants at the District, subcounty and Parish levels for distribution of the printed study materials. These staff are existing civil servants who will remain subject to their existing terms and conditions of employment. However, there is a risk that additional personnel outside the District structures will be required in order to provide the printed materials in time as well as reach all students. Such personnel are likely to be subject to local hiring arrangements which will need to be addressed in the LMP to ensure that the rights of all workers are met.

The project will employ contracted workers to provide WASH materials (handwashing facilities etc), training services and workers to provide psychosocial support. These workers will be employed by third parties contracted to the project and their employment must meet the requirements of National Law and ESS2.

Primary Supply Workers will be involved in the provision of materials such as handwashing facilities. The number of primary supply workers is expected to be limited. Nevertheless, in line with ESS2 when selecting supplier's consideration should be given to the risks of child labor, forced labor and occupational health and safety risks.

The project will prepare and LMP based on the UTSEP project which will be updated to include contracted and primary supply workers. The LMP will identify the main labor requirements and how different categories of workers will be managed, in accordance with the requirements of national laws and ESS2. Occupational Health and Safety Considerations will be included in the Labor Management Plan (LMP) including measures to reduce the risk of transmission of Covid-19. The LMP will also adopt the MoES Code of Conduct, including measures to prevent SEA/VAC & SH, and safety training materials. Mitigation measures also include prevention, mitigation and effective response and support for school related SEA based on the pathways adopted in the MOES Reporting, Tracking, Referral and Response (RTRR) Guidelines on Violence Against Children in Schools A worker specific grievance mechanism will be established under the project which will cover all categories of workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

The relevance of ESS3 arises from risks associated with sanitation, disinfection, WASH and waste management. In preparation for opening of schools, the cleaning and disinfection of schools could generate waste (such as product containers, contaminated materials, ordinary domestic waste,) but the impact is not expected to be significant on environment and human health. Additionally, once the schools are reopened, nonhazardous waste will be generated in the school premises and wastewater from hand washing facilities that will be provided at various locations within the school premises. Buckets to collect wastewater from hand washing facilities will be provided to prevent contamination of surrounding environment. Likewise, measures for safe collection and disposal of solid waste generated will be implemented at each school/ institution. The ICWMP that will be prepared by the MoES and disseminated to all schools will include waste management measures



ESS4 Community Health and Safety

ESS4 is relevant from the perspective of risks associated with disease transmission, community health and safety, emergency preparedness and other social aspects of sexual exploitation and violence. COVID-19 pandemic can contribute to community exposure to the disease, particularly during mobilization of teachers and communities; continued risks of COVID-19 transmission in schools and communities once school reopen. The learners staying in refugee settlements are at higher risks of transmission in case of an outbreak due the dense settlements and the locations of these settlements towards boarders of other countries with COVID-19.

The project will include appropriate mitigation measures to respond to emergency related to COVID-19, adopt Infectious and prevention control protocol for all schools, include measures for regular health screening of teachers and learners to ensure safety of the teachers, learners and the community. The project will also identify in the SEP all appropriate requirements for community engagement in emergency preparedness planning in case of outbreak of COVID-19 on site. All potential health and safety risks and impacts will be included in the Infectious control and waste management plan (ICWMP).

Risks related to sexual exploitation/violence against children and abuse, sexual harassment (SEA/VAC/SV) and other forms for gender-based violence (GBV) to women and girls are a conceivable possibility. For example, risks associated with Project workers and distribution of learning materials. The GBV risk rating for the project is assessed to be moderate necessitating integration of mitigation measures to manage these risks. Mitigation measures include reliance on the Ministry of Education Code of Conduct to ensure avoidance of any form of SEA/VAC/SV; strengthening the education system's accountability mechanisms to provide a safe school environment through prevention, mitigation and effective response and support for school related SEA based on the pathways adopted in the MOES Reporting, Tracking, Referral and Response (RTRR) Guidelines on Violence Against Children in Schools ; conducting regular safety audits as part of the stakeholder engagement to assess develop and implement measures and actions to regularly assess and manage the risks of SEA/VAC/SV and other forms of GBV extending from project activities. A SEA/SV Prevention and Response Action Plan will be included in the ESMF in line with the MOES RTRR to include measures for minimizing SEA/VAC/SV and GBV.

The risks related to use of security forces was not considered since the current project design will not involve use of security forces.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Not relevant as no physical or economic displacement is expected in this project.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The activities are unlikely to impact on biodiversity and ecosystems.

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



Although the geographical location of the project is yet to be confirmed, There is a possibility that Vulnerable and Marginalized Groups (Batwa and IK)/ indigenous communities could be present in or near several areas targeted by the project. The project may directly include schools built by earlier projects like the Uganda Secondary Education Expansion Project (USEEP) P166570,which aimed at Improving access by expanding the network of secondary schools in underserved areas in south-western Uganda(Batwa) and the edge of Karamoja where the IK are found. Should the presence of indigenous communities be confirmed through further screening, the project will address any risks posed to them and measures put in place to ensure that they receive culturally appropriate benefits. This will be done by ensuring that their views are sought as specified in the Stakeholder Engagement Plan (SEP) and that a Social Assessment (SA) is carried out prior to carrying any activities that would impact indigenous communities. Following the SA, and as appropriate: (i) a stand-alone plan or framework may be developed; (ii) or key elements of risk mitigation and culturally appropriate benefits will be prepared. Public consultations with representatives of indigenous communities and their organizations are provided for in the SEP, considering their circumstances. These organizations and representatives will be consulted during the revision of the SEP. The project will exclude any activities which would require Free, Prior and Informed Consent.

ESS8 Cultural Heritage

This standard is not relevant according to the activities planned under the project.

ESS9 Financial Intermediaries

This standard does not apply.

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	
1. An Infectious Control and Waste Management Plan (ICWMP)	
2. GBV/VAC/SEA/SH Assessment and Plan	09/2020
To address the Borrowers capacity related risk, the MoES will hire/assign 2 Social Specialists and one	



Environmental Specialist no later than 30 days after the Effectiveness date .	
ESS 10 Stakeholder Engagement and Information Disclosure	
Stakeholder Engagement Plan (SEP)	
The SEP will be updated and re-disclosed no later than 30 days after the Effectiveness date. The SEP will then be continuously updated during project implementation.	09/2020
ESS 2 Labor and Working Conditions	
Labor Management Plan (LMP), including labor GRM, will be finalized with 30 days of Effectiveness .	09/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
Infectious control and waste management plan	09/2020
Infectious Control and Waste Management Plan will be finalized within 30 days of Effectiveness.	
ESS 4 Community Health and Safety	
Infectious control and waste management plan	09/2020
Infectious Control and Waste Management Plan will be finalized within 30 days of Effectiveness.	
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
Vulnerable and Marginalized Group Framework (VMGF)	09/2020
ESS 8 Cultural Heritage	
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 Borrower's framework is not being considered.

**IV. CONTACT POINTS****World Bank**

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Borrower/Client/Recipient

Borrower: Government of Uganda

Implementing Agency(ies)

Implementing Agency: Ministry of Education and Sports

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Hongyu Yang

Practice Manager (ENR/Social) Robin Mearns Cleared on 20-Jul-2020 at 11:45:19 EDT

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