



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 07/21/2020 | Report No: ESRSA00822



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Nigeria	AFRICA WEST	P170664	
Project Name	Adolescent Girls Initiative for Learning and Empowerment		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	4/7/2020	7/28/2020
Borrower(s)	Implementing Agency(ies)		
Federal Republic of Nigeria	Federal Ministry of Education		

Proposed Development Objective

To improve secondary education opportunities among girls in targeted areas in participating states.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>500.00</b>

**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]**

To empower adolescent girls through secondary education and market relevant skills training

**D. Environmental and Social Overview**

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

It is broadly known that project activities will likely take place in seven States in Nigeria with some of the lowest girls secondary school attendance and other indicators; namely, Borno, Ekiti, Kaduna, Kano, Katsina, Kebbi and Plateau. Given the uneven institutional capacity and weak enforcement of legislation including the geographical coverage,



there are social and environmental risks in terms of the ability to advance the social norms proposed, improve educational attendance and completion for adolescent girls. Furthermore, the project will be implemented within complex and varied fragility/conflict contexts potentially posing significant risks to beneficiaries and communities in support of girls' education.

**Conflict/fragility challenges:** Some areas of the participating States in the project are considered fragile and are periodically affected by conflict/violence. For instance, the nine-year conflict in North-East Nigeria has created a deepening humanitarian crisis. Violence by non-state armed groups and military operations continue to affect millions of people – and in some cases have targeted the beneficiary group identified for this project, notably, in the North-East, where risk of kidnapping of school girls remains a concern. The conflict—combined with the ongoing military operations and its spill-over into neighboring Cameroon, Chad and Niger—has caused the displacement of more than 2.5 million people in the region, of whom 1.9 million are internally displaced in Nigeria, according to the IOM Displacement Tracking Matrix (DTM) Round 24, August 2018. In this regard, a Security Risk Assessment will be conducted, and a Security Management Plan will be prepared as a part of the site-specific ESMPs to address potential security risks and social risks that may arise from security personnel interacting with communities, notably with female teachers and students. Third party monitoring will also be explored for use in hard to supervise areas of the projects, with special attention to monitoring the implementation of GBV/SEA/SH Action Plan.

**Behavioral campaigns to change social norms:** A key aspect of the project is covered under sub-component 2.2 where behavioral campaigns will seek to change social norms about girls' access to, and completion of, education. Social risks may include, for example, the further isolation or violent targeting of school girls or those in favor of girls accessing education within the context of attending these campaigns or endorsing the campaign messages. In this sense, stakeholder engagement should thoroughly assess the ideal language, pace and targeting of the campaigns to ensure they don't exacerbate existing exclusion, stigmatization or violence against girls, female teachers, parents or others within the community that either attend schools or wish to encourage the attendance of girls in school. Furthermore, managing how to have safe and robust discussions with those that may be initially unsupportive of the proposed social norms, without isolating them from their families or communities, will be critical.

**Gender- and School-Based Violence:** Other issues being addressed within the project design are largely linked to risks of GBV, SEA and SH (associated with construction, students en route to school), young marriages and Interpersonal Violence (IPV) such as domestic violence that may arise or be exacerbated between parents/guardians due to conflicts over how grants are used or whether their daughters should access education. Furthermore, concerns include school-based violence (e.g., bullying, corporal punishment, humiliation, sexual harassment, etc.), reflecting risks beyond the construction phases. Some of the drivers of educational exclusion are culturally sensitive topics (e.g., child marriage) and as such, discussion of these issues in some parts of the country is very limited, even amongst women. Furthermore, legal protections for GBV/SEA/SH are generally weak including access to survivor services. Considering the close proximity of the contractor, teachers and female students in schools and the focus of the project on adolescent girls, it is critical to put in place measures to protect school children, young people and teachers from potential sexual exploitation and abuse by contractors and workers. During construction, the use of local builders will partially mitigate these risks. In addition, while students are at school, measures should be put in place to ensure that students are protected from school-based violence that may disincentives attendance or affect ability to complete school. A GBV Human Development Risk Assessment Tool has been applied to this project, indicating that risks are substantial, particularly if implemented in areas in which there are armed groups/militias, hard-to-supervise areas and there is humanitarian presence. A Recipient-led GBV/SEA/SH assessment and draft costed Action Plan has been



developed and has informed project design on prevention and mitigation of GBV/SEA/SH. The assessment recommends the adoption of a Whole School Approach that involves empowering all stakeholders working towards a shared vision of violence prevention and reduction. Furthermore, the ESMF includes a 'expanded ESMF' within which a social assessment is embedded; the assessment covers social risks and impacts including an assessment of the social dimensions of the project related, but not limited to, Gender and GBV risks, project impact on vulnerable groups including persons living with disabilities, social conflicts that may arise from financial support packages etc. and considers the implications for labor influx. The assessment will help the Recipient understand key social issues and risks, and to determine social impacts on different stakeholders. This was initiated early at the preparatory stage to help shape the project design and components and inform relevant plans and processes (SEP, ESMP, RAPs, Grievance Redress Mechanism's (GRM), GBV/SEA/SH action plan, disability inclusion considerations, etc.).

Possible Environmental Challenges: The project will support civil works (expansion of junior and senior secondary education through the construction of schools and classrooms) which could generate waste management issues primarily as a result of excavated soil and construction debris. The waste generated by the construction works will largely be disposed of at government approved disposal sites according to the national laws and regulations to ensure that contractors do not leave hazardous wastes (paint containers, cement bags, diesel/oil containers, batteries, etc.) in the communities. In addition, rehabilitated schools would be screened for the presence of asbestos in roofing or insulation. If found, proper waste management and disposal will be followed per international good practices. Furthermore, project activities could impact on water use, including possibility of Carbon dioxide (CO2) emission due to energy use. Accordingly, site specific ESMP (to minimize risks and impacts) will be prepared during project implementation to avoid, reduce, mitigate and compensate or offset using the mitigation hierarchy.

#### D. 2. Borrower's Institutional Capacity

The project will be implemented in multiple schools across seven States of the country where there is potential for a wide range of impacts to occur. The capacity to manage environmental risks at the Federal level is better known because the Federal Ministry of Education has demonstrable positive track record of cooperation with the Ministry of Environment in safeguards implementation for projects. Federal Ministry of Education has also demonstrable experience, commitment and capacity in the implementation of several World Bank-assisted education projects in the past such as the Lagos Eko project. However, the provisions of the new World Bank Environmental and Social Framework (ESF) that relate to social aspects such as labor, GBV, protection and inclusion of vulnerable groups, community health & safety and land acquisition and livelihoods are under the purview of multiple ministries or department and agencies (MDAs) such as Ministry of Women Affairs & Social Development, Department of Lands, Ministry of Labor etc. Typically, these Ministries/Departments do not have policies and regulatory provisions that address the ESF requirements holistically. Therefore, although the Recipient is highly committed to the project and aware of important social risk and inclusion issues, there is a lack of unified institutional anchoring for social risk management leading to fragmentation of efforts and poor inter-agency coordination on social issues.

At the State level disparity in capacity is expected; the capacity of the implementing entities to carry out the proposed activities in a manner that is consistent with the objectives of the ESF is also uncertain and is particularly hindered in contexts affected by conflict and violence. Moreover, the laws underpinning Social and Environmental safeguards required for the project are weakly enforced. Some key gaps include environmental law not applying to school buildings unless they are high-rise. While there seems to be adequate legal and institutional frameworks for managing environmental issues, the ability of the relevant institutions to enforce the existent laws is rather weak and would require further strengthening.



Regarding gaps in the protection of women and children, Nigeria’s national government has taken steps to penalize and address GBV and SEA, however clear institutional leadership and capacity with the leverage to garner multi-sectoral support to address this complex problem, including sufficient budgetary resources, remains a challenge. Critically, adoption and enforcement of the Child Rights Act (2003) and the Violence Against Persons Prohibition Act (2015) is uneven across states. The institutional champion for women’s and children’s rights and GBV issues within the government is the Federal Ministry of Women Affairs. As such, this Ministry has been an integral participant in stakeholder engagements to inform the project preparation and design thus far. Further, both the National Project Coordinating Unit (NPCU) and State Project Coordinating Unit (SPCU) – responsible for the coordination and oversight and day-to-day implementation of safeguards activities, respectively – will comprise representatives from the Ministry of Women Affairs and Youth.

During project implementation, both the National Project Coordinating Unit (NPCU) and State Project Coordinating Unit (SPCUs) will be responsible for the coordination, oversight including day-to-day implementation of safeguards activities. The Project Coordinating Unit (PCU) will include qualified staff on Environment to handle issues on Climate Change, Occupational and Community Health and Safety, a Social Mobilization/Behavioral Change staff as well as Gender/GBV officer to ensure that risks related to GBV, SEA, SH, social exclusion of vulnerable groups and communal tensions are addressed.

The client has taken steps to strengthen its capacity and align with ESF requirements; for instance, during project consultations and through the ongoing World Bank’s ESF capacity building program in Nigeria, the capacity of the country is being enhanced including the capacity of client-staff working on this project, while the drafting of various E&S instruments has been completed. Furthermore, the project will carry out relevant capacity building on ESF, including on Stakeholder Engagement, GBV/SEA/SH, GRM, Occupational and Community Health and Safety, Labor Management, Waste Management etc. (as articulated and costed in the ESMF) for relevant staff from different MDAs and as stated in the ESCP. State-level institutional capacity assessment including capacity for preparedness, response and implementation of emergency activities of implementing agencies in selected states will be conducted and required capacity building activities will be implemented to close identified gaps during project implementation

Finally, strengthening of capacities and definition of roles and responsibilities on environmental and social management will be defined in the project’s operational manual(s).

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

### A. Environmental and Social Risk Classification (ESRC)

Substantial

#### Environmental Risk Rating

Moderate

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

- The project will support civil works (expansion of junior and senior secondary education through the construction of schools and classrooms) in seven States whose locations are not known at this stage.
- The limited experience and capacities that the government at different levels might have with the application of the new ESF and the weak enforcement of national legislation.



- The experience and capacities to supervised, evaluate, mitigate and prevent environmental impacts will be challenging given the high number of stakeholders such as the Ministry of Education, School Boards, Mothers Associations, Ministry of Health, Ministry of Environment, etc., involved.
- Challenges in adequately managing Hygiene and Waste Management in schools in a manner that will encourages girls to attend school while accessing clean and safe hygiene facilities.
- Given the potential for scarcity of natural resources such as water in the arid and semi-arid areas of the country where the project will be located, the issue of limited water supply (for construction and drinking needs) in some locations may arise.
- Challenges with Labor Influx as a result of expansion of junior and senior secondary education.
- The issue around Cultural Heritage may arise should the project encounter tangible cultural heritage and intangible cultural heritage.
- The issue of Community Health and Safety as a result of construction or rehabilitation of schools under component 1 activities.
- Other risks are linked to the numerous actors which will be participating in the project and environmental management and supervision can be diluted.
- Site specific ESMPs (to minimize risks and impacts) will be prepared during project implementation to avoid, reduce, mitigate and compensate or offset using the mitigation hierarchy.

**Social Risk Rating**

Substantial

The social risk rating remains substantial at this stage. Since the project’s primary beneficiaries are vulnerable (adolescent girls) and the project will be implemented in multiple schools across seven States, there is potential for a wide range of impacts to occur, which the Recipient has limited capacity to manage. Supervision also could represent a challenge given the range of impacts with a range of challenges including security related issues, social risks associated with the interaction of security personnel with communities, Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/Sexual Harassments(SH), potential for social conflicts given the promotion of social norms that may not be endorsed by some communities or groups, for all of which there is limited local capacity to systematically mitigate.

Under component 1-Creating safe and accessible learning spaces, which includes the expansion of junior and senior secondary education, the primary social risks include land acquisition (e.g., in the case that land is occupied by displaced persons) and resettlement associated with the rehabilitation/construction of schools, and negative community health and safety impacts, including the risk of SEA/SH and other forms of GBV associated with any construction workforce, teachers, fellow students and community members. Girls are at risk of school-based violence that may be inflicted by fellow students (e.g., bullying) or teachers (e.g., corporal punishment). Within schools, the risks of SGBV will likely be higher while the project (especially civil works) is being implemented, but is expected to decrease once the project is in place. However, school-based violence risks may remain beyond this stage and as such specific mitigation measures should be considered. Accessible and appropriate GBV grievance mechanisms and access to survivor services will also need to be provided for girls and other affected persons, such as teachers.

Under Subcomponent 2.3— Providing financial incentives to the poorest households —may lead to conflicts where a parent or guardian may not use the funds for the intended purpose or there are conflicts between parents/guardians about the use of funds due to conflicting social norms about girls’ access to education. In such cases, incidents of interpersonal violence (IPV), such as domestic violence, may be exacerbated. Thorough stakeholder engagement should be conducted to understand the social norms and potential conflicts that may arise within households and the

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broader community from the cash-based scholarships, so that the subcomponent does not result in exacerbating IPV or broader social/communal conflict. This is especially critical, as the financial support intends to be given to the mother of the targeted girl. To ensure full inclusion of the most vulnerable—such as girl-headed households, girls living with HIV/AIDS, IDPs, etc.—targeting will need to be considered in relation to various societal groups and locations. Furthermore, there are risks of elite capture/corruption given the exchange of cash and in-kind transfers. Under subcomponent 2.1- Promoting social and behavior change activities will include addressing social norms that have enabled non-positive attitudes and behaviors towards girl’s education and empowerment. Measures to handle the promoting social and behavior change activities will be reflected in the site-specific ESMPs.

Given the inclusion of Borno State, as well as other high risk and hard-to-supervise areas, security personnel (particularly in the North East) might be used for protection of school properties and affected communities. There is possibility that these security personnel might have formal or informal interaction with communities, which might constitute a social risk. Therefore, a Security Risk Assessment will be conducted to assess the use of security personnel in the project.

## **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:***

Assessment and management of environmental and social risks and impacts are required for the whole project, but at this stage, the activities of Component 1 are identified as the most likely to generate environmental and social risks and impacts. The Component will include civil works to build new secondary schools and address the dilapidated learning conditions in existing secondary schools (classrooms, offices, multi-purpose labs, latrines).

The project will make use of ESS1 to assess and manage risks and impacts such as waste and waste water, sewage, and safety (e.g., electrical, fire, safe materials such as no lead -based paint, traffic safety) of the students. The Recipient has prepared an Environmental and Social Management Framework (ESMF) that outlines the principles, procedures, timing and steps that will be taken in preparing site specific safeguards instruments (ESIAs & ESMPs) during project implementation. In addition, the Recipient’s Environment and Social Commitment Plan (ESCP) has been prepared and sets out the client’s commitments to prepare and implement safeguard instruments throughout the lifecycle of the project. The site specific Environmental and Social Management Plans (ESMPs) will include clearly defined mitigation measures for pre-constriction, construction and operational phases, roles and responsibilities, timetables, budgets and implementation arrangements for each mitigation measure recommended, GBV/SEA/SH requirements, and will be prepared once sites are identified and before civil works begin (including community-led civil works). Construction contractors will be required, as a condition of their contracts with the project, to implement and comply with the ESMPs, including Labor Management Procedures and Occupational Health and Safety measures outlined in the ESMF. The ESMPs will make use of the general and sector-specific Environmental Health and safety Guideline (EHSGs) for the identified activities in relation to occupational and community health and safety.

##### **Social Impacts:**

The social impacts related to Component 1 (supply-driven) and Component 2 (demand-driven) would be different because of the nature of the components. The demand-driven component would broadly need to ensure that it is



inclusive of appropriate/most vulnerable and marginalized groups in terms of the cash and in-kind transfers and the behavioral change campaigns, while also mitigating risks of isolation/stigmatization of those that don't immediately support girls' education and those who do endorse the norms. The supply driven component's emphasis would be on the construction related social risks, like SEA and GBV, as well as risks that may be present beyond construction phase, notably school-based violence (e.g. corporal punishment, bullying etc.), which have implications for attendance and completion of school. The Recipient has prepared an 'expanded ESMF' within which a social assessment is imbedded. The assessment will help the Recipient understand the key social inclusion and risk issues and determine the potential impacts on different stakeholders.

1. Construction Phase: The construction/rehabilitation of schools will generate social impacts which will need to be avoided, mitigated or compensated. Potential impacts during construction include community health and safety associated with disease transmission and road traffic accidents, labor and working conditions, including conditions not aligned with workers' rights under national laws, as well as the risk of child labor. In addition, impacts to cultural heritage could occur. Acquisition of land for the construction of schools may result in physical and / or economic displacement (due to the potential of displaced persons occupying derelict school facilities), which could be addressed by developing a Resettlement Policy Framework (RPF). The construction of new schools will also need to take into account considerations of inclusion for all students notably students with special needs, IDPs, pregnant adolescent girls, GBV/SEA/SH survivors etc., as well as parents and teachers. As the project is being developed across several states, these impacts will have differential effects on different groups in society, as such mitigation measures should be adaptive to the specific project-level contexts. Capacity to monitor the implementation of the project and the implementation of social risk mitigation measures is limited and will be addressed through capacity building.

2. Operational Phase: During operation, the project would aim to create safe school environments which will reduce the risk of SEA, other forms of GBV and school-based violence,—among other things—by reducing travel distance to schools and raising community awareness for the need to ensure protection of girls and boys on their way to school and within the school environment. To mitigate risks of school -based violence, and ensure the inclusion of marginalized or stigmatized girls, suggested measures include hiring female teachers, providing technical assistance on the development of Codes of Conducts (CoC) which cover GBV/SEA/SH and other forms of violence in the school, training teachers and principals on the CoCs, developing Accountability and Responsibility Frameworks and ensuring that GBV mapping of service providers is conducted, schools have clear referral pathways for potential incidents and finally, ensuring the activities on life skills covers issues of GBV and school-based violence. Poor management of schools (especially in relation to wastes and sanitation) can result in increased disease transmission, and in children (especially girls) being unwilling to attend school due to inaccessibility to clean, private (separate from male facilities) toilets. Therefore, it will be important to maintain sanitary facilities and implement sound waste management.

3. Inclusion and stigmatization: Girls are more likely to face risks of exclusion (bullying and stigmatization) at school than boys. Other vulnerable groups include those with disabilities, the poorest children, pregnant girls, etc. This should be addressed through adequate awareness and campaign targeting social norms in subcomponent 2.1., the SEP and the life skills training provided to students. Also, girls who become pregnant can be stigmatized and may be less willing to continue their education and this will require specific measures to avoid stigmatization.



The risk of social conflict over project impacts or benefits also needs to be considered especially in terms of who is targeted for cash and in-kind transfers, where schools are built and renovated, as well as conflicts that may arise because of different stances to the promotion of social norms.

### **ESS10 Stakeholder Engagement and Information Disclosure**

Stakeholder engagement is key to the success and sustainability of the project development objectives. The following stakeholders have been identified:

- a. Federal Ministry of Education
- b. Federal Ministry of Women Affairs
- c. State Ministries of Education
- d. State Ministries of Women Affairs
- e. Nigeria Inter Religious Council (NIREC)
- f. Nigerian Interfaith Action Association (NIFAA)
- g. Traditional leaders
- h. All Nigeria Confederation of Principals of Secondary Schools
- i. Teachers Associations (Secondary Schools)
- j. State Government (Ekiti, Kebbi, Katsina, Plateau, Kano, Borno, Kaduna)
- k. International and national NGOs
- l. Research/academic community
- m. Adolescent girls and their parents
- n. State Universal Basic Education Board (SUBEB)
- o. Ministry of Health

The SEP was prepared and disclosed locally on January 29, 2020 and on the World Bank website on February 1, 2020. The SEP seeks to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with stakeholders, consider stakeholders' views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, culturally accessible and appropriate manner.

Feedback from early engagement with stakeholders informed the project design and preparation and this will be an iterative process throughout the project life. Based on the engagement activities thus far and the profile of the stakeholders identified, certain engagement activities have been planned for the project going forward and are articulated in the SEP. The SEP will be updated periodically based on a monitoring process and feedback of the stakeholders throughout the life of the project. The SEP will continue to ascertain key project risks as the communities see them; ensure concerns of communities are acknowledged and addressed; inform better targeting mechanisms for financial packages and school identification and identify the best monitoring mechanisms of activities. Future engagement will seek inputs from stakeholders on how to develop an adaptive behavioral campaign that addresses differentiated concerns in communities, and the likely varied adoption rates of social norms as well as how to strengthen the projects 'safe school' approach.



Furthermore, the SEP will be updated to include awareness raising for communities regarding the risks associated with the use of security personnel and to inform them of grievance arrangements should they wish to raise grievances related to security personnel.

The project will have two main GRMs; the project-level GRM which will be managed by each participating State's PIU and the labor-specific GRM for project workers (all direct workers, contracted workers and community workers). The GRMs will include GBV/SEA/SH protocols - , including multiple channels to initiate a complaint and specific procedures for SEA/SH, such as confidential and/or anonymous reporting with safe and ethical documenting of SEA/SH cases - to ensure responses to potential GBV/SEA/SH incidents follow ethical standards and international best practice. GRM operators will be trained on how to respond to GBV/SEA/SH-related reports.

## **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 intends to build new, and refurbish existing, secondary schools under Component 1, which will require the use of labor. Furthermore, it is expected that the State government will be responsible for the financing of the teacher's costs. Nevertheless, the project will provide a support package to the recruited teachers to ensure that they are qualified and ready to teach in the target communities. The package may include: i) short induction courses; ii) code of conduct; and iii) short-term placement at the feeder primary schools to learn about the students and community that they will work with.

Potential environmental and social risks and impacts relevant to the project could emerge from failure to: i) promote the fair treatment, non-discrimination and equal opportunity of its workers; ii) protect its workers, including vulnerable workers such as women, persons with special needs, children of working age, and migrant workers, contracted workers, community workers and primary supply workers, as appropriate; iii) prevent the use of all forms of forced labor and child labor; iv) support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and v) provide project workers with accessible means to raise workplace concerns.

As required under ESS2, the project will, in collaboration with State Ministry of Education, develop and implement written labor management procedures applicable to the project. Furthermore, the project will take appropriate and proportionate mitigation measures to eliminate or minimize risks and impacts discussed above, including, putting in place: a) a policy on working condition and management of worker relationship - Labor Management Procedures (LMPs), b) measures for protecting the workforce and to prevent child labor and forced labor, c) a workers grievance redress mechanism, d) measures on occupational health and safety, e) provisions addressing contracted workers, f) provisions on community workers, g) measures to prevent and address sexual harassments of teachers hired and who will receive a support packages, and h) measures relating to primary supply workers.

Occupational hazards likely to occur during implementation of civil works include: traffic accidents, electrocution, falling from heights, being struck by falling objects or moving machinery, and construction related fractures, lacerations or more serious injuries. The project might include community workers (as part of the effort to maximize



local benefits). In such cases the project must ensure that Personal Protective Equipment (PPE) is distributed and used. In case of accidents, these community workers should receive the same care as other project workers. In the implementation of the project, the government will include project OHS measures that address: i) potential hazards for workers (materials, activities, substances); ii) protective and prevention measures, iii) provision of training, and iv) first aid, and v) hygiene facilities. The arrangements to respond to the requirements of ESS2 have been described in the Labor Management Procedure (LMP), which considered information on the national requirements, the Environmental Health and Safety Guidelines on Occupational Health and Safety and Good International Industry Practice (GIIP).

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

Risks related to the application of the ESS3 include Government consideration of cost savings which can result in the use of low-priced materials without considering resource efficiency, or the safety and well-being of users. Other factors include:

**Water use:** Access to water is a very important success factor for the project. Water is needed for the construction of the works and implementation of the WASH supported activities in the schools. However, in some areas, water is scarce and its uses, collection, storage, access and management and potential pollution as part of project design will need to be addressed during construction and operation. The Recipient will use the ESMF to assess the potential cumulative impacts of water use upon communities and the environment and will identify and implement mitigation measures proportionate to the risks and impacts. The water boreholes if and, where required, would be dug at safe distances from toilets to avoid contamination of ground water. The site specific ESMPs to be prepared will include mitigation measures to minimize and manage proposed measure to address water use. Nonetheless, it is not expected that the project will be a significant user of water.

**Energy use:** The lack of electricity in many rural areas may result in the need to provide schools with basic energy sources through the deployment of diesel generators as a backup or as the primary source of electrical power which will constantly discharge CO<sub>2</sub> during service life. Alternative energy sources could include the installation of solar panels. Solar panels can break or become non-functional and many times are not replaced. Batteries' (which are connected to solar panels) storage requirements need to be addressed and their disposal provided for, so they do not become hazardous waste in rural communities. At any rate, the project scope and scale are not likely to result in significant emission of greenhouse gases. The site specific ESMPs to be prepared will include mitigation measures to minimize and manage the noise levels by applying standard restrictions to hours of site work.

**Waste management:** Construction activities will generate solid waste which will primarily include excavated soil and construction debris. The waste generated by the construction works will largely be disposed of at government approved disposal sites according to the national laws and regulations. During construction, the contractors will be required to protect the soil and nearby streams from use for cleaning machinery and disposing hazardous construction wastes or residues. The government will need to define construction disposal sites according to acceptable parameters of ESS3 and to ensure that contractors do not leave hazardous wastes in the villages (paint containers, cement bags, diesel/oil containers, batteries, etc.). Furthermore, rehabilitated schools would be screened for the presence of asbestos in roofing or insulation. If found, proper management and disposal will be followed per international good practices.



### ESS4 Community Health and Safety

By increasing access to secondary schooling, the project will invest in building schools and classrooms in areas where secondary schools are thinly spread. Therefore, there is the potential for impacts to community health and safety which will need to be assessed and mitigated through the site specific ESMPs.

Potential social impacts may include increased risk of GBV/SEA/SH associated with the presence of the construction workforce, and the transmission of communicable and/ or vector borne diseases. However, the use of local contractors close to the communities may help in limiting these risks. In addition, any increase in vehicle movements associated with the construction activities, and local sourcing of materials, could also increase the risk of accidents involving members of the community and workers. 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 unfenced and/or unsigned hazardous such as excavated sites, trenches, and exposed electric cables. New and updated school infrastructure (component 1.1 and 1.2) must also ensure unimpeded access to all including persons with disabilities. School infrastructure should also consider the design of latrines and hand washing systems taking into account important issues such as menstrual health, privacy requirements for adolescent girls and water-borne diseases which will require prevention measures.

The Government has prepared an ESMF that outlines the principles, procedures and steps that will be taken in preparing site specific ESMPs with due consideration for community health and safety issues. The ESMF will make use of the general and sector-specific EHSs for the identified subprojects. The client will include all agreed commitments to maintain community health and safety in the ESCP.

Given the inclusion of Borno State, as well as other high risk and hard-to-supervise areas, the Recipient will prepare a Security Risk Assessment before the carrying out of the respective Project activities and no later than within 6 months of Project Effectiveness. Further, the Security Personnel Management Plan shall be adopted and implemented prior to engaging security personnel and thereafter implemented throughout Project implementation. In the event that the security personnel are engaged and armed, no proceeds of the project will be used to support the procurement of firearms. In addition, their deployment will follow the requirements of ESS4 and adopt the World Bank's Guidelines of the Good Practice Note on "Assessing and Managing the Risks and Impacts of the Use of Security Personnel." Overall, prior to deploying military or security personnel, the SPIU shall take measures to ensure that security personnel are: (i) screened to confirm that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force; (ii) adequately instructed and trained, on a regular basis, on the use of force and appropriate behavior and conduct (including in relation to SEA and SH) and will adopt the Voluntary Principles on Security and Human Rights as the relevant good international industry practice to meet the requirements of ESS4 (these will be provided in the revised ESMF); and (iii) deployed in a manner consistent with applicable national law. The SPIU shall promptly review all allegations of unlawful or abusive acts of any military/security personnel, take action (or request appropriate parties to take action) to prevent recurrence and, where necessary, report unlawful and abusive acts to the relevant authorities. In addition, accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10 and described in the SEP.



### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The project will invest in increasing the number of schools and building additional classrooms, thus land may need to be acquired. As the locations of schools and facilities are not currently known, it is not possible to determine the exact nature or extent of any physical and /or economic displacement that may occur. However, previous experience shows that there might be possible displacements of people who may have occupied derelict or abandoned schools. Given that the project specific impact location will not be known at appraisal, the Recipient has prepared a Resettlement Policy Framework (RPF). When specific impact locations are known and when more information is made available on land requirements of the project, site specific RAP(s) shall be prepared. The preparation of site-specific RAP(s) shall be guided by the RPF. The cost associated with compensation and resettlement assistances shall be covered by the participating States.

### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Nigeria is rich in biodiversity and ecosystems. The project will support civil works in some remote areas where wildlife and protected areas are present. Some potential impacts might include cutting of trees or natural vegetation as source of materials for the schools. Also, construction pits and ditches can affect local fauna by trapping and may lead to soil erosion.

The ESMF assesses potential direct, indirect and cumulative impacts and it will apply the mitigation hierarchy to define measures to protect and reduce impact on ecosystems and biodiversity. Natural and critical habitats will not be affected, but that the construction of new schools and school extensions will be limited to modified natural habitats. The ESMF also outlines preventive and mitigation measures, such as restoration of nearby areas using native species that could be affected by clearing to restore landscape and provide shade for the schools and increase biodiversity conservation in the area. No invasive alien species are expected to be introduced by the project. No biodiversity offsets are expected to be needed.

Human and domestic animals (cows, goats, dogs, etc.) and wildlife will be present in different locations and these conflicts could be minimized by installing fences at the schools. This could also serve as measures for the safety of the girls.

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

This ESS is not relevant as there are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.

### **ESS8 Cultural Heritage**

Nigeria is rich in archeological, paleontological and cultural heritage which include ruins of Queen Amina's walls, bones and lithic artifacts, etc. The Environmental and Social Assessment will identify the existence of tangible or intangible cultural heritage at project sites and the ESMF includes guidance regarding how to manage any negative impacts. Since the project will be financing some civil works, some excavation, movement of earth and impounding can be expected. These types of activities pose the possibility of encountering both known and unknown physical and cultural resources. The treatment of Physical Cultural Resources Management (PCR) including archaeological relics,



fossils, human graves, shrines, sacred trees or groves that may be encountered will follow a Chance Finds Procedure that will be elaborated in the Environmental and Social Management Plans.

### ESS9 Financial Intermediaries

The Project will not involve the use of financial intermediaries.

## B.3 Other Relevant Project Risks

Insecurity in the country, including the ongoing conflict in the North East (notably Borno State as the epicenter) may limit project supervision and monitoring in accordance with the ESF. The project will explore the possibility of a Third-Party Monitoring Agency (TPMA) to assist the Recipient with Project supervision and implementation support in the event of travel restrictions as a result of security issues. Third Party Monitoring (TPM) will be key for independently monitoring the implementation of plans that seek to address social risks such as security risks and GBV/SEA/SH. As such, TPM will be critical in monitoring the implementation of Security Management Plans and the GBV Action Plans – particularly in hard-to-supervise areas and conflict/fragile locations. In the event that security forced are warranted, appropriate measures will be taken as explained above in ESS4.

Disability-Inclusion/People with Special Needs: About 25 million Nigerians had at least one disability, while 3.6 million of these had very significant difficulties in functioning (The World Report on Disability, 2011). Moreover, given the disparity between boys and girls in school attendance in Nigeria, young disabled girls tend to be even more excluded than their male counterparts. Children with disabilities worldwide face cultural, economic and social barriers from within and outside the education system that directly or indirectly impact their ability to get a high-quality education. Exclusion of children with disabilities from education has an adverse economic impact at the family, community, and country level. The schooling deficit experienced by children with disabilities can become the most challenging impediment to earning an income and long-run financial health as adults. To this end, the project design takes cognizance of the demand and supply side barriers to inclusive education so as not to exacerbate inequality and limit the ability of persons with disability from attending, completing and accessing quality learning. There are also other vulnerable and/or disadvantaged groups including female-headed households, child-headed households, orphans and vulnerable children which should be considered in the design and implementation of the project.

Inclusion of Internally displaced adolescent girls: According to the December 2015 DTM (Displacement Tracking Matrix) report, there are currently over 1.9 million Internally Displaced People (IDPs) in conflict-affected northeast Nigeria (Adamawa, Bauchi, Borno, Gombe, Taraba and Yobe). The majority of IDPs are in Borno (close to 67 percent), followed by Adamawa (6 percent) and Yobe (6 percent). Close to 56 percent of IDPs are children, and over 28 percent are five years old or younger. The number of school-age IDP children by State over the 2014- 2019 period amounts to between 550,000 and 600,000. The overwhelming majority of IDPs are with host communities, and, in many instances, IDPs children attend school with host community children. However, there are often instances where schooling facilities are not available for displaced children, and teaching takes place either in tents or mobile classrooms. Further, because of their displaced status, completion of education was disrupted when initially displaced, and this disruption can be a significant challenge for adolescent children in completing school. Within this



context, consideration of IDP-related needs and support for project design and implementation would be important to enable the ability of IDPs to attend, complete and access quality learning too.

**C. Legal Operational Policies that Apply**

- OP 7.50 Projects on International Waterways** No  
The project will not trigger this policy
- OP 7.60 Projects in Disputed Areas** No  
This policy is not triggered because project will not be implemented in disputed area

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

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
<b>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</b>	
MANAGEMENT TOOLS AND INSTRUMENTS: Disclose and implement the following: i. Environmental and Social Management Framework (ESMF); ii. Labor Management Procedure (integrated in the ESMF); iii. Resettlement Policy Framework (RPF); iv. Stakeholder Engagement Plan (SEP) including Grievance Redress Mechanism (GRM); and v. Updated GBV / SEA risk assessment and draft action plan.	01/2020
Establish and maintain throughout project implementation an organizational structure with qualified staff and resources to support management of Environmental & Social risks in sufficient numbers including at least one Environmental Specialist and one Social Specialist in the State and Federal PIU.	12/2020
Adopt, disclose and implement the Environmental and Social Management Framework (ESMF) prepared for the Project, in a manner acceptable to the Association. The assessment will help the Recipient understand the key social inclusion and risk issues and determine the potential impacts on different stakeholders. The ESMF, shall include a section on Labor Management Procedure and a social analysis that will identify key social inclusion and risk issues, and the impact on different stakeholders.	01/2020
Screen any proposed subproject in accordance with the ESMF prepared for the Project, and, thereafter, draft, adopt, and implement the subproject Environmental and Social Management Plan (ESMP), as required, in a manner acceptable to the Association.	12/2020
Incorporate relevant aspects of the ESCP and the E&S documents required under this ESCP into the procurement documents with contractors.	12/2020
Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, the Labor Management Procedures, and the GBV/SEA Action Plan into the subsidiary agreement to be entered between the Recipient and the Participating States for the implementation of the Project.	12/2020

Public Disclosure



Public Disclosure

Conduct state-level institutional capacity assessment of implementing agencies in selected states and implement capacity building activities to close identified gaps.	12/2020
<b>ESS 10 Stakeholder Engagement and Information Disclosure</b>	
Prepare, consult, adopt and disclose SEP, and continuously update.	01/2020
SEP updated, cleared and incorporated into the project’s management system, adequate staffing and budget will be allocated for the implementation of the SEP.	12/2020
Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.	01/2020
Implement GRM and update as may be required.	12/2020
<b>ESS 2 Labor and Working Conditions</b>	
Update, adopt, and implement the Labor Management Procedure (LMP) that have been developed for the Project and included as a chapter in the ESMF.	01/2020
Develop, maintain and operate a Grievance Redress Mechanism (GRM) for Project workers as described in the LMP and consistent with ESS2.	12/2020
Implement capacity building of Project Workers to increase awareness of social and environmental risks, code of conduct, mitigation measures including the association's procurement processes and ESF.	12/2020
Prepare, adopt and implement occupational, health and safety (OHS) plan and measures throughout Project implementation.	12/2020
<b>ESS 3 Resource Efficiency and Pollution Prevention and Management</b>	
Prepare, adopt and implement a Waste Management Plans as part of ESMPs.	12/2020
<b>ESS 4 Community Health and Safety</b>	
Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs.	12/2020
Prepare and implement site specific ESMPs that include mitigation measures to minimize/manage the risks/impacts associated with uncovered or barricaded or unfenced and/or unsigned hazardous such as excavated sites, and exposed electric cables.	12/2020
Prepare, adopt, and implement a stand-alone GBV/ SEA Action Plan, to assess and manage the risks of GBV/SEA/SH). During implementation, identify and designate one focal point who can be a first point of contact for students experiencing GBV.	12/2020



Prepare a Security Risk Assessment (SRA).	12/2020
Prepare, adopt, and implement a Security Personnel Management Plan consistent with the requirements of ESS4.	
<b>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	
Resettlement Action plans (RAPs) will be done once subproject sites are known.	12/2020
Prepare, adopt, maintain and operate a grievance mechanism to address resettlement related complaints, as described in the SEP.	12/2020
<b>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>	
Prepare and implement site specific ESMPs that include mitigation measures to minimize/manage the risks/impacts associated with natural habitats in a manner acceptable to the Bank prior to construction of structure (s) that may affect biodiversity.	12/2020
<b>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</b>	
<b>ESS 8 Cultural Heritage</b>	
Prepare and implement a Chance Finds Procedure that will be elaborated in the ESMPs if archaeological relics, fossils, human graves, shrines, sacred trees or groves are encountered.	12/2020
<b>ESS 9 Financial Intermediaries</b>	

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:**

Nil

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: Federal Republic of Nigeria



**Implementing Agency(ies)**

Implementing Agency: Federal Ministry of Education

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s):	Aisha Garba Mohammed
Practice Manager (ENR/Social)	Sanjay Srivastava Cleared on 20-May-2020 at 08:09:16 EDT