



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Updated: 04/14/2020 | Report No: 148026



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Rwanda	AFRICA	P174046	P168551
Project Name	Rwanda Quality Basic Education for Human Capital Development Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	5/27/2019	7/30/2019
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance and Economic Planning (MINECOFIN), Republic of Rwanda	Ministry of Education (MINEDUC), Republic of Rwanda, Rwanda Education Board (REB)		

Proposed Development Objective(s)

The PDO is to improve teacher competency and student retention and learning in basic education in Rwanda.

Financing (in USD Million)	Amount
Total Project Cost	209.72

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
We have received CD’s approval to apply Paragraph 12 of Section III of the IPF Policy to process this AF using Condensed Procedures, within the context of the global COVID-19 pandemic.

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

The proposed Additional Financing (AF) in the amount of US\$9.7 million from the Global Partnership for Education (GPE) is being prepared to support the country’s COVID-19 Education Response. The funding will be provided as AF to the Rwanda Quality Basic Education for Human Capital Development Project (QBEP) (P168551). QBEP is funded by an IDA credit of US\$200 million equivalent and was approved by the Board of Executive Directors on July 30, 2019, signed by the Government of Rwanda on August 1, 2019 and became effective on November 20, 2019. The project development objective of the parent project is to improve teacher competency and student retention and learning in basic education.



The proposed Additional Financing (AF) will add a fourth component to QBEP. It will finance select activities from MINEDUC's *Education Sector COVID-19 Response Plan*, to support continuation of quality learning while protecting the health and well-being of approximately 2 million (50 percent female) students and an estimated 40,000 teachers targeted under the parent project in the short, medium, and long term. The proposed activities are organized and sequenced to provide seamless support for the sector to resume its activities and emerge stronger and more resilient to face future shocks. The package of preparedness and response activities proposed under this AF are to achieve the following sub-objectives:

- a. Continuing learning and tracking student progress;
- b. Ensuring safe re-opening of schools and return of all students;
- c. Ensuring health and safety of students and teachers on return to schools;
- d. Protecting vulnerable groups of students (including girls, children with disabilities and those from low-income households) from compounded negative impacts of the crisis;
- e. Generating resilience to prepare for potential recurrence of COVID19 or for other emergencies.

Component 4: Supporting the national COVID-19 response for continued learning, recovery, and resilience in education sector (US\$9.7 million equivalent). The proposed project activities are organized into two sub-components identified for the modality of service delivery, such as remote support for continued learning and wellbeing of students and teachers, and school-based capitation grants to ensure safe reopening and return of all students.

Sub-component 4.1: Optimizing and implementing remote approaches for continued learning, wellbeing and resilience.

Continuation of student learning while also generating systemic resilience to future disruptions is the primary goal of this component. This will employ a combination of modalities:

- Expand remote learning opportunities for students and teachers during school closure through radio broadcasting of lessons aligned to the competency-based curriculum.
- Promote the development and use of alternative audio-visual materials on national television and the REB youtube channel (zero-rated).
- Strengthen the use of Rwanda Education Board's (REB) e-learning platform for students and teachers to access different subject textbooks, lessons and assessments. The e-learning platform will support continuous professional development of teachers by allowing them to access training modules.
- Adopt mobile phone technology (free SMS) to enable communication between REB and teachers, and with parents, for regular communication of messages around the use of remote learning options

In addition to *continued student learning*, this component will deliver the following set of interrelated activities using a combination of radio, television, and online channels: (a) Disease control and prevention: Audio and visual content specific to management of the current pandemic; (b) Continued professional development (CPD) of teachers remotely during school closure and after; (c) Back-to-school campaign. This involves educating students and the community on disease prevention for safe and sustained re-opening of schools, and motivating students to return to school; (d) Gender sensitization campaign to mobilize community support for protection of vulnerable girls and boys from various forms of violence; and (e) Parent and community engagement in student learning.

Sub-component 4.2: Supplementing school grants to support safe re-opening, student re-entry and sustained progression in schools.

Under this subcomponent, MINEDUC will reassess the composition of eligible capitation grants expenditures and supplement it with additional financing in order to prioritize the following needs: (a) Enhanced provision of soaps and hand-washing facilities adaptive to persons with disabilities to schools; (b) Provision of scholastic materials to schools (for children) in order to offset the cost of schooling for poor households; (c) Provision of targeted nutrition support¹ for at least 3 months (achievable without requiring construction of kitchens) in collaboration with development partners and districts; (d) Organization of parent and community mobilization activities through Local Government and School General Assembly Committees to ensure that students' return to school; (e) Establishment of remedial (catch-up)

¹ An exception is being sought from the Africa Regional Vice President to finance school feeding expenditures.



programs for students at risk of repetition and dropping out (drawing additional resources from other ongoing learning support projects). The targeting criteria is being established in consultation with the ministry and development partners. These adjustments and additional provisions will be in effect for the short- and medium-term support (until end of the 2020 calendar year). If the crisis conditions continue or worsen, the school grant composition will be reassessed for necessary modifications.

D. Environmental and Social Overview

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

The proposed scope of the project will be focusing on key education development priorities identified by MINEDUC, REB and other stakeholders, and will be organized in four components. Activities within these components will leverage the innovative approaches currently being piloted in the country and will focus on the use of technology to bring about transformative change in the basic education sector. Specifically, the project will prioritize learning to build a solid human capital foundation, target critical areas to achieve transformational change in basic education, and use technology to create an enabling environment and tools for accelerated learning and improved classroom practice. Additionally, it will build model schools and scale up successful pilots and align with the Education Sector Strategic Plan (ESSP) and coordinate with programs and initiatives of development partners. The project sites will be primary, secondary schools and TTCs located in the 30 Districts across the Country. The specific schools in each District to benefit from this project are yet to be identified. The project activities under component 1, 2 and 3, will involve rehabilitation and construction of new class-rooms, new satellite schools, toilets, laboratories, supply of ICT equipment's, development of e-learning platforms. Rehabilitation of existing structures will involve civil works. Under component 1, subcomponent 1, the objective of this sub-component is to improve teaching by creating a dynamic network of 17 demonstration schools to support TTC students' practice training and develop new knowledge about teaching and instructional leadership. Sixteen comprehensive schools near 16 Technical Teachers Colleges (TTCs) and 1 school where University of Rwanda-College of Education (URCE) is located will be developed as demonstration schools. There are two main activities: (i) Building the capacity of the demonstration schools in order to effectively play their roles; and (ii) Supporting TTCs and disseminating innovative teaching and learning practices to other schools in the country. School infrastructure will be improved to ensure that each demonstration school has the facilities appropriate for the teaching and learning needs of a comprehensive school as well as the facilities necessary for the production and dissemination of innovative teaching and learning strategies to other schools. This will include a conference room for use by visiting trainers and teachers, video facilities for recording model lessons, and for use by mentors and subject heads, a 3-classroom preschool block, basic teaching and learning materials, textbooks and supplementary reading books, equipment for science/ICT/language laboratories, and supplementary teaching and learning materials.

Under component 2, the project will improve the school environment to support student learning. Critical issues of overcrowding, double-shifting, and long distances to schools will be addressed through the construction of additional classrooms in existing public schools. Under subcomponent 2.1 activity 1, the project will finance about 8,000 additional furnished primary classrooms in existing public schools to reduced overcrowding. An additional 12,000 latrines will also be financed at the same time on the same sites according the national standard of 1.5 latrine per classroom. The project will target overcrowded schools with the objective to build the required number of classrooms. The number of targeted schools is more than 1400, corresponding to about half of the primary schools in the Country, and the average number of classrooms per school to add would be about 7. According to this methodology, the targeted schools are distributed



in all Districts. For the largest schools, currently with over 20 classrooms, the option to build the additional classrooms in a separate nearby new school, rather than in the existing one, will be considered.

Under activity 2, the project will build new schools, MINEDUC has developed the concept of “satellite” primary schools temporarily attached to a neighborhood “mother” primary school for administrative purposes, gradually developed by phases until the school has grown up enough to become a full-fledge primary school and can administratively be detached from the mother school. As a first phase, the standard new “satellite” school is composed of 4 classrooms and a block of 6 latrines. Districts and Sectors has identified a list of 165 sites where the construction of new schools is a crucial action to improve attendance and decrease drop out by reducing distance to school. An estimated 79,000 children would benefit from this sub-program, comprising about 2,000 classrooms and 3,000 latrines, which will be built under the Unconventional Approach.

New classrooms to be constructed under this project will be dispersed in various schools in rural areas. The civil works activities will be confined within the school land that belongs to the GoR and hence no land acquisition anticipated under this project. However, experience from the Human Resources Development Program funded by the bank in 2000 in Rwanda, the ICR indicated that rehabilitation and constructions of new classrooms in existing schools encountered the issue of encroachers who had cultivated the vacant school land. The Resettlement Policy Framework (RPF) prepared for this project has identified some social issues relate to the proposed subproject activities to include, land acquisition, squatters, illegal settlers and potential need for voluntary land donation for government aided schools that comprise 71% of the benefiting schools in this project. All those issues have been identified and social risk mitigation measures have been proposed and mainstreamed in the project design and implementation arrangement.

D. 2. Borrower’s Institutional Capacity

Implementation will be mainstreamed within MINEDUC and REB with the project activities falling under the responsibility of the relevant departments/agencies. The AF will follow the same model designed to support the delivery of QBEP, in line with the existing Government arrangements for project implementation. As currently in practice, two Single Project Implementation Unit (SPIUs) will oversee coordination and support of implementation: one located within MINEDUC and one in REB. Similarly, districts are responsible for implementation at the subnational levels, including implementation of E&S aspects of the project. The MINEDUC-SPIU will oversee overall project coordination. In addition, MINEDUC-SPIU will supervise and coordinate the overall environmental and social (E&S) matters, and communication of the project. The *REB-SPIU* will be responsible for the implementation of subcomponent 4.1 as well as for the monitoring and reporting arrangements to provide data on the progress of the proposed activities in both delivery, reach, and outcomes. The *MINEDUC-SPIU* will be responsible for the implementation of subcomponent 4.2 on school capitation grants.

The project would be led at the strategic level by the MINEDUC’s Project senior management team (the Minister, the Minister of State, the PS of MINEDUC, DG of REB, and Dean of UR-CE), and coordinated by the SPIU within MINEDUC. The MINEDUC SPIU currently has 17 Environment and Social safeguards specialist, of which two are at PIU level and 15 at District level. The project has established and operationalized GRCs at all project sites across the Country. The project has the required environmental and social personnel to oversee the preparation and implementation of the required ESS instruments for AF. The SPIU staff have been trained in the World Bank ESF and relevant procedures and such trainings will continue. Mentoring and intensive implementation support would also be needed, particularly in the early



stages of implementation. The ESS capacity needs for the districts and sectors implementing the project have been incorporated into the project activities and allocated the required resources in the project subcomponent 3.2.

The Project subcomponent 3.2 specifically aims to finance and support project management and build implementation capacity in the Single Project Management Units (SPIUs) at the Ministry of Education (MINEDUC) and the Rwanda Education Board (REB) to ensure effective execution of the project.

To do so, the Project will (i) finance key staff in SPIUs at MINEDUC and REB in key functions, including environmental and social standards officers, and operations and planning throughout the project implementation period, motor vehicles, and motorcycles for field visits. Financing is budgeted to support Monitoring and Evaluation activities, including workshop for project stakeholders to understand project planning, reporting requirements, (ii) support training of MINEDUC SPIU and REB SPIU staff in the areas of project sensitization of stakeholders to raise their awareness of gender, citizens’ engagement, environmental and social issues, climate disaster management, and co-benefits of climate change mitigation, and (iii) fund training workshops based on relevant World Bank standards, guidelines and frameworks.

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

The project maintains the moderate environmental risk rating considering AF will not include works and school construction activities. The AF will not finance construction activities, and focus on mitigating potential health and safety issues related to students and teachers on return to schools which may result in continued risk of disease transmission and associated waste management issues. All these will have also impacts on community health and safety, in relation to COVID-19 pandemic. The anticipated risks and impacts of the parent project under component 1 and 2 are related to works for basic infrastructure for improved learning conditions. The civil works will include rehabilitation of existing classrooms and facilities, construction of additional classrooms and new satellite schools.

The AF project activities are organized into two sub-components, such as remote support for continued learning and wellbeing of students and teachers, and school-based capitation grants to ensure safe reopening and return of all students. These activities present a moderate environment risk and there are no significant adverse environmental risks and impacts related to the AF that would require increasing the ERR.

The project potential risks and impacts to the environment, are typical to construction activities and manageable within the confines of the rehabilitation and constructions sites, health and safety issues of students and teachers on return to schools, and occupational health and safety issues for workers to be engaged in the rehabilitation works. Therefore, relevant mitigation measures have been proposed to address the potential risks and impacts of the AF to the parent project. All these will be incorporated in the parent projects’ ESSs instruments (SEP, LMP, ESCP and ESMF).



Social Risk Rating

Substantial

The project will maintain the Substantial SSR for the parent project because the AF will not include works and school construction activities, there are no significant adverse social risks and impacts related to the AF that would require increasing the SRR. The primary social risks for the parent project include; significant land acquisition required for the construction of new schools on over 165 new sites, land required for construction additional 8000 classrooms and 12000 toilets on existing schools given land scarcity issues in Rwanda, the existence of some encroachers on existing school land that would required compensation, the "unconventional approach" of project implementation approach poses labour management risk that requires clear mitigation measures. GBV related risks. Gender sensitization campaign to mobilize community support for protection of vulnerable girls and boys from various forms of violence. This is particularly important to prevent expected spikes in domestic abuse, teenage pregnancy, and consequent dropping out from school resulting from stay at home orders in the current pandemic.

Increased poverty for those who are unable to work from home and earn an income may lead to an increased burden of out-of-pocket cost for schooling as well as a higher opportunity cost of education for households. School closures bring the risk of increased school drop-out, particularly for girls and those from poor households, and increased levels of violence against children. The context of COVID-19 crisis presents additional risks of GBV and teenage pregnancy as women and young girls are more prone to domestic abuse under stay-home orders without regular access to school teacher's and other support systems in the community. Rates of GBV, especially intimate partner violence have increased as people stay at home and change behavior in response to the spread of COVID-19. Other types of GBV include sexual assaults against children and the disabled. While AF project activities present low additional risk of GBV, they provide an opportunity to support initiatives that seek to address gender gaps and disparities in access and learning achievement for boys and girls; address GBV among out of school children, as well as ensure disability inclusion activities.

All these risks are considered to continue to be substantial at this stage and proportionate additional mitigation measures have been proposed for this AF to the existing 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:

The AF will have positive impacts on supporting continuation of quality learning while protecting the health and well-being of students and teachers targeted under the parent project in the short, medium, and long term. Its proposed activities are also organized and sequenced to provide seamless support for the sector to resume its activities and emerge stronger and more resilient to face future shocks. However, there are potential issues related to health and safety issues related to students and teachers (on return to schools) which may result in continued risk of disease transmission and associated waste management issues. All these will have potential risks and impacts in relation to community health and safety. There will be also GBV risks.

The Project proposes to undertake basic infrastructure works for improved learning conditions. Most of the construction works, expected to be implemented within the existing schools' boundaries, will include the rehabilitation



of existing school buildings and construction of additional classrooms. The Project will also construct new satellite schools (estimated at 400) with an average of 5 classrooms per school. The potential environmental and social risks and impacts from the works are expected to be typical construction works associated risks and impacts that may include noise, dust emissions, vegetation clearance, soil erosion, accidents and injuries. It is likely that the construction of new schools will require land acquisition. The volume of construction works raises the risk of Sexual Exploitation and Abuse (SEA) that will have to be addressed during implementation. However, these risks will have to be addressed in the site specific Environmental and Social Management Plans by incorporating mitigation actions to be implemented during Project execution.

An Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) have been prepared and that has assessed the potential environmental and social risks and impacts. The ESMF will be updated to address potential environmental and social impacts of the AF. The ESMF and RPF will provide guidance on mainstreaming environmental and social issues in school construction and rehabilitation works. As the details of Project activities and precise locations of implementation sites are yet to be determined, the ESMF and RPF give recommendations on the preparation of the corresponding site-specific Environmental and Social Management Plans (ESMP) and Resettlement Action Plans, as appropriate. A Stakeholder Engagement Plan (SEP) has also been prepared. It will guide the project on stakeholder engagement and information to be shared or disclosed, throughout the Project cycle i.e. Project preparation and execution. A Labor Management Procedure (LMP) has also been prepared to guide all labor related issues under this operation (as per the national laws and the bank ESS2 requirements).

The MINEDUC SPIU has held several consultation meetings with the education sector stakeholders to introduce the project and get feedback that continue to inform the project design and selection of schools for project implementation.

The MINEDUC SPIU proposes to use a construction methodology (called “unconventional approach”) that relies heavily on voluntary community participation. This method has successfully been applied by the Government of Rwanda to build several thousand classrooms in the last 10 years. This method has been improved with the involvement of different development partners to address their corresponding requirements. To ensure compliance with Environment and Social Standard 2 on labor and working conditions, the unskilled labor under this project to be on the project site daily, will be contracted workers with a signed contract and an agreed daily payment fee, instead of the voluntary free labor applied under typical "unconventional approach" under Umuganda. However, the voluntary labor offered during the last Saturday of every month by the entire community will be used where necessary under this project. Also due to COVID-19 pandemic, all works will be required to have PPEs that are appropriate for workers health and safety to mitigate the potential spread of COVID-19 on the project site to ensure that community participation approach does not add to the risk of disease spread.

Land availability is another issue identified for more than a third of the targeted sites, where school land will need to be acquired through expropriation. For Activity 1, the scope of the land availability issue is largely limited to “public schools” (only 29% of the total number of schools). The remaining schools (71%) are government-aided schools built on land belonging to various religious denominations who are important land owners. MINEDUC, through Districts, will engage them to explore the possibility of voluntary land donation for construction of additional classrooms. The engagement of these key stakeholders is part of the Stakeholders Engagement Plan (SEP) that will be done at each district, and the results of this exercise will be documented and shared with the Bank.



As for Activity 2, one third of the proposed new public primary schools require land acquisition. As all sites are identified, once the benefitting schools are also identified, MINEDUC will conduct a detailed evaluation of the land situation of these schools. At sites with no land acquisition requirement, new school construction will be prioritized to start civil works in the first year, while new schools with the need for land acquisition will be constructed in the second year of the Project implementation (after preparing Resettlement Action Plans (RAPs) and full compensation of affected households).

Component 4: Supporting the national COVID-19 response for continued learning, recovery, and resilience in education sector (US\$9.7 million equivalent). The proposed project activities are organized into two sub-components identified for the modality of service delivery, such as remote support for continued learning and wellbeing of students and teachers, and school-based capitation grants to ensure safe reopening and return of all students. These activities are grouped into two main subcomponents as elaborated in the following section. Under Sub-component 4.1: Optimizing and implementing remote approaches for continued learning, wellbeing and resilience. This subcomponent, the project will support i) Expand remote learning opportunities for students and teachers during school closure through radio broadcasting of lessons aligned to the competency-based curriculum, ii) promote the development and use of alternative audio-visual materials on national television and the REB youtube channel (zero-rated), iii) Strengthen the use of Rwanda Education Board's (REB) e-learning platform for students and teachers to access different subject textbooks, lessons and assessments.

The e-learning platform will support continuous professional development of teachers by allowing them to access training modules and, adopt mobile phone technology (free SMS) to enable communication between REB and teachers, and with parents, for regular communication of messages around the use of the available remote learning options. Inclusive remote learning opportunities will be established as a regular feature of education services offered by the MINEDUC and its Agencies. This will combine the use of both digital and mass broadcasting tools. Disability inclusion in remote learning content will specifically include captioning, interpretation, use of images and examples that are inclusive and do not stigmatize.

Under Sub-component 4.2 the project will supplement the school grants to support safe re-opening, student re-entry and sustained progression in schools. Among other activities, the project will (i) enhance provision of hand-washing facilities adaptive to persons with disabilities to schools; and (b) provide of targeted nutrition support for at least 3 months (without requiring construction of kitchens).

ESS10 Stakeholder Engagement and Information Disclosure

The project implementation involve several stakeholders that include the following, MINEDUC, REB, UR- CE, TTCs, Sci Digital Media Institute, Districts, squatters, community members around the schools, parents associations, NGOs, P with disabilities (PWDs) and Districts. The client (MINEDUC) has prepared a SEP as part of the project preparation implementation. The SEP builds on existing community engagement platforms such as "Umuganda, Akagoroba kabal among other fora to engage community members. However, due to COVID-19 and the current lockdown in Rwanda, project will explore other forms of stakeholders engagement. The use of mass broadcasting tools such as radio, n SMS, and television will be utilized to generate consciousness and support for girls and boys at increased risk of vic



during stay-at-home orders. The interventions will consider where children go if they need to report a case of GBV or a case they need protection. The project will explore the use of social media, television, mobile phones and radio, to send messages on healthy conflict resolution, healthy parenting, stress and anger management in community and other awareness campaigns. Technology and mass communication will be used to diffuse information and reach communities with emergency messages to apply within the home and with others. The SEP will provide details on how this will be done in practice including the setup of the Grievance Redress Mechanism (GRM). Parent and community engagement in student learning. A helpline will be created for parents, students, and community members to support their queries related to remote learning opportunities as well as to generate feedback on the efficacy of resources. The use of zero-rated SMS services will be used to communicate important messages and reminders for parents on learning schedules of children. The REB Radio-TV will air instructional broadcast to cultivate knowledge and involvement in early stimulation, student learning. The SEP for the on-going project will be updated by the Ministry of Education to reflect the AF additional activities. The updated SEP will be submitted to the bank for review, clearance and disclosure before the appraisal for the AF. The RPF, ESMF, SEP all have established the list of stakeholders that will be engaged during project implementation. The key stakeholders so far identified are the usual players that include the Ministry of Education (MINEDUC); Rwanda Education Board; and University of Rwanda. Other stakeholders at the level of decentralized governance units i.e. districts, sectors and NGOs operating in each District.

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

Anticipated key labor risks and impacts are mainly associated with the planned construction works. As per the Prime Minister's directive, all construction activities are on hold including this project. The activities are scheduled to resume after the lockdown. The project promotes the use of PPE's, handwashing and safe distancing once project activities resume as appropriate on sites. There may be instances of child labor associated with the use of local labor. The client must provide appropriate measures for the protection of vulnerable project workers such as women and people with disabilities. The majority of those involved will be existing government civil servants. As such, these employees will remain subject to the terms and conditions of their existing public-sector employment. Workers to rehabilitate, construct additional class rooms and new satellite schools are likely to be few in number but may require skilled workers from outside of the area of work, e.g. for the installation of technical equipment). Due to the discreet nature of these activities labor camps and influx are not anticipated. These individuals will however be subject to the requirement of ESS2 in relation to labor and working conditions including occupational health and safety and grievance mechanisms. Likewise, any technical consultants contracted by the Project will also need to adhere to such standards. To ensure health and safety of workers during the construction and operational phases of the project, a Health, Safety and Environmental (HSE) plan in line with Good International Industry Practice (GIIP) will be prepared as part of the ESMF. This includes health screening of workers to ensure additional support measures to reduce risks of spread of COVID-19 during implementation of activities by community workers.

During operation, this will include detailed requirements for the transport, handling and disposal of chemicals/reagents and other hazardous materials. The plan will include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and continuous training and awareness to workers. In addition, the project will need to develop and implement written labor



management procedures that will set out the way in which project workers will be managed. The LMP will be prepared prior to appraisal for this project.

ESS3 Resource Efficiency and Pollution Prevention and Management

Though not significant, the AF will have pollution management issues in relation to use of PPE and hand washing and related wastes. The project design could explore the use of hydra-form bloc technology where possible and limit the use of baked bricks during classroom construction to reduce the need for firewood, avoiding detrimental impacts on the environment. The classroom rehabilitation activities could explore landscaping to prevent erosion and planting of sapling shade trees, re-vegetation which contribute towards the carbon sequestration process and reducing soil run off. Using energy saving bulbs for the school lighting or solar should also be considered. The following will be further assessed during project implementation (at the subproject screening level):

- Promoting the sustainable use of construction materials and other raw materials extracted from the natural environment;
- Promoting sustainable use of water and energy resources. The project could consider installing tanks for rain water storage to supplement current water supply or alternative energy solution for cooking fuel; and
- Adoption of good practices for managing e-wastes.

There is also a potential of rehabilitation activities that could involve demolition or replacement of existing infrastructure's containing hazardous materials such as asbestos and the ESMF include Rwanda Environmental Management Authority (REMA) guidelines and measures to consider for removal and disposal of hazardous materials such as asbestos. The ESMF to be updated will comprise waste management issues and relevant mitigation measures related to the AF.

ESS4 Community Health and Safety

As the project will involve civil works (under the parent project), the community health and safety issues related to this project could potentially include, sexual exploitation and abuse given the fact that the construction work will be carried out in existing schools for additional classrooms. The project design to ensure consideration for the universal access in toilet/latrine construction, and in all new school building to be constructed under this project, for disability and inclusive education. It also considers potential health and safety issues related to students and teachers on return to schools which may result in continued risk of disease transmission and associated improper waste management issues. Toilets construction will also require portable water where possible to improve hygiene in and around schools. However, in case the toilets to be constructed are pit latrines, such latrines in schools especially in rural areas are usually not clean and represent a potential health risks to students and the surrounding community. Gender-Based Violence (GBV) or Sexual Exploitation and Abuse (SEA) of students which may arise from interactions with construction workers; and Incidences of increased erosion, runoff and landslides affecting local community properties.

School closures bring the risk of increased school drop-out, particularly for girls and those from poor households, and increased levels of violence against children. The context of COVID-19 crisis presents additional risks of GBV and teenage pregnancy as women and young girls are more prone to domestic abuse under stay-home orders without



regular access to school teacher's and other support systems in the community. Rates of GBV, especially intimate partner violence have increased as people stay at home and change behavior in response to the spread of COVID-19. Other types of GBV include sexual assaults against children and the disabled. While AF project activities present low additional risk of GBV, they provide an opportunity to support initiatives that seek to address gender gaps and disparities in access and learning achievement for boys and girls; address GBV among out of school children, as well as ensure disability inclusion activities. A GBV /domestic abuse action plan will be prepared under this project.

COVID-19 pandemic can contribute to community exposure to the disease, particularly as community labor working in large numbers. The project will include appropriate mitigation measures in the Emergency response plan in case of an emergency related to COVID-19. The project will also identify in the updated SEP all appropriate requirements for community engagement in emergency preparedness planning in case of outbreak of COVID-19 on site. All potential E&S risks and impacts of the AF will be included in the ESMF to be updated.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Land availability is an issue identified for more than a third of the targeted sites, where school land will need to be acquired through expropriation. For activity 1, the scope of the land availability issue is largely limited to "public schools" that are only 29% of the school total. The remaining schools (71%) are government-aided schools built on land belonging to various religious denominations who are important land owners and MINEDUC through Districts will engage them, to explore the possibility of voluntary land donation for construction of additional classrooms. The engagement of these key stakeholders is part of the Stakeholders Engagement Plan (SEP) that will be done at each district, and the results of this exercise will be documented and shared with the bank.

As for Activity 2, one third of the proposed new public primary schools require land acquisition. MINEDUC will conduct a detailed evaluation of the land situation of all targeted schools once the benefiting schools are identified. The sites with no land acquisitions requirement, civil works will commence in the first year, while new schools with the need for land acquisition, construction will start in the second year of the project implementation after preparing Resettlement Action Plans (RAPs) and full compensation of affected households.

The client has prepared the RPF that guide the project implementation to address the risks mentioned under this standard.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project is not anticipated to have activities with impacts on biodiversity or living natural resources. The project implementation sites will be located in modified landscapes i.e. already used for schools, training centers and universities. However, the ESMF include specific measures to avoid or minimize this negative impacts. At this stage the ESS6 is not relevant.

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



Relevance of this ESS will be further assessed. At this stage the project sites are not yet finalized. We expect to explore the relevance of this standard as we get more information especially about selected locations for the subproject sites.

ESS8 Cultural Heritage

Although no impacts to cultural heritage are anticipated, the project has incorporated “chance find” procedures in the ESMF when physical cultural resources are encountered during construction. At this stage, ESS 8 is not relevant

ESS9 Financial Intermediaries

Relevance of this ESS will be further assessed during project preparation as part of the ESA process. The project is not anticipated to have Financial Intermediaries as project implementation entities.

B.3 Other Relevant Project Risks

Preliminary assessment does not indicate high reputational and/or political economy risk that could adversely influence or hinder the project from achieving environmental and social standards compliance. This will further be assessed.

Should "Other Relevant Project Risks" be disclosable? Yes

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	
Establish an organizational structure with qualified staff to support management of Environment and social risks. Recruit two (2) E&S staff at MINEDUC PIU level and 15 E&S at District level.	10/2019
Update the ESMF to reflect the AF activities	05/2020
Obtain ESIA clearance from Rwanda Development Board (RDB) as required by the Rwanda Environmental laws.	08/2019



Capacity building of MINEDUC/SPIU, REB and District level Environment and social Standard's Officers in environment and social risk management, land acquisition, environment and social safeguards monitoring and reporting and other relevant areas related to this project.	11/2019
ESS 10 Stakeholder Engagement and Information Disclosure	
Consolidate all existing grievance redress channels into a single grievance mechanism for the project and update the GRM to cater for AF. The SEP will be updated to reflect the AF activities.	05/2020
Conduct annual citizen feedback surveys	11/2020
ESS 2 Labor and Working Conditions	
Update the Labor Management Procedure to reflect the activities of AF.	07/2020
Establish and maintain a Grievance Redress Mechanism for the project workers	11/2019
Update the Occupational Health and Safety (OHS) of the parent project to reflect the activities of AF. Develop and implement OHS measures	07/2020
Update the Emergency preparedness and response of the parent project to reflect the AF and COVID-19 related risks and response mitigation measures. As part of the OHS measures, include measures on emergency preparedness and response, and ensure safety of the workers and the community	07/2020
Project Workers training. Implement a training of project workers designed to create awareness' raising of risks and mitigation impacts on local communities and COVID-19 risks	07/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
Management of waste and hazardous materials. Develop and implement measures and actions to manage waste and hazardous materials from school laboratories	11/2019
ESS 4 Community Health and Safety	
COVID-19 pandemic can contribute to community exposure to the disease, particularly as community labor working in large numbers per site. The project will include appropriate mitigation measures in the Emergency response plan in case of an emergency related to COVID-19. The project will also identify in the updated SEP all appropriate requirements for community engagement in emergency preparedness planning in case of outbreak of COVID-19 on site.	07/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
Prepare the RPF	05/2019



Prepare the Resettlement Management Plans (RAPs)	11/2019
Prepare VLD reports where applicable	11/2019
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
Not relevant at this stage	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
Not relevant at this stage	
ESS 8 Cultural Heritage	
Not relevant at this stage	
ESS 9 Financial Intermediaries	
Not relevant	

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

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

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

The project will rely on the Bank ESF during project preparation and implementation.

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

None at this stage

IV. WORLD BANK ES OVERSIGHT

Corporate advice/oversight will be provided by an Environmental and Social Standards Adviser (ESSA) during project preparation No

V. CONTACT POINTS



World Bank

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Borrower/Client/Recipient

Borrower: Ministry of Finance and Economic Planning (MINECOFIN), Republic of Rwanda

Implementing Agency(ies)

Implementing Agency: Ministry of Education (MINEDUC), Republic of Rwanda

Implementing Agency: Rwanda Education Board (REB)

VI. FOR MORE INFORMATION CONTACT

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VII. APPROVAL

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