Project Information Document/Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 18-Mar-2019 | Report No: PIDISDSC24167
## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iraq</td>
<td>P166250</td>
<td></td>
<td>Iraq Education Sector Development Project (P166250)</td>
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</table>

<table>
<thead>
<tr>
<th>Region</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
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<tbody>
<tr>
<td>MIDDLE EAST AND NORTH AFRICA</td>
<td>Apr 08, 2019</td>
<td>May 30, 2019</td>
<td>Education</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Financing Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
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</thead>
<tbody>
<tr>
<td>Investment Project Financing</td>
<td>Republic of Iraq</td>
<td>Ministry of Education, Ministry of Education - Education Project Management Team (MOED-PMT)</td>
</tr>
</tbody>
</table>

#### Proposed Development Objective(s)

The project development objective is to restore equitable learning opportunities in pretertiary education.

## PROJECT FINANCING DATA (US$, Millions)

### SUMMARY

<table>
<thead>
<tr>
<th>Total Project Cost</th>
<th>$500.00</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Financing</td>
<td>$500.00</td>
</tr>
<tr>
<td>of which IBRD/IDA</td>
<td>$500.00</td>
</tr>
</tbody>
</table>

### DETAILS

**World Bank Group Financing**

| International Bank for Reconstruction and Development (IBRD) | $500.00 |

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Environmental Assessment Category: B - Partial Assessment

Concept Review Decision: Track II-The review did authorize the preparation to
B. Introduction and Context

Country Context

**Iraq is gradually emerging from a difficult period of conflict and subdued economic growth.** Decades of conflict, economic mismanagement and sanctions have perpetuated a lingering poverty trap (around 23 percent of the population are estimated to live below the poverty line), severely weakened governance, and chronic fragility. The country is endowed with natural resources such as crude oil and natural gas (Iraq is the fifth largest global producer and has one of lowest extraction costs as of 2017), a demographic dividend due to a relatively young population, and geographic diversity. However, these resources have played a key geopolitical role in deepening political infighting, most notably in the conflict against the Islamic State in Iraq and Syria (ISIS), and have strained ethnic and sectarian divides.

**Three decades of prolonged conflict and fragility have led to deterioration in economic development and human capital formation.** An estimated 200,000 civilians have died since 2003, 3 million people are currently displaced, and 11 million people, who constitute over a quarter of the population, need humanitarian assistance (Save the Children 2017). IDPs account for nearly 20 percent of the additional population that has fallen into poverty as a direct result of the most recent conflict with ISIS (World Bank, 2016).

**Years of conflict led to changes in the social fabric of Iraq and a breakdown in family structure.** Women and children are the most heavily affected by the violence in Iraq, with 49 percent of internally displaced people (IDP) under the age of 18. Moreover, the instability in Iraq has led to increases in the rate of early marriages as families have perceived that they had no alternatives to protecting their young girls (World Bank 2014).

**Despite these stark realities, the end of the war against the ISIS presents itself as an opportunity for the Government of Iraq (GOI) to shift the country’s development trajectory.** The war in Iraq has subsided and the fight against ISIS is largely considered over (BBC 2017). The end of the war provides an opportunity to leverage the resulting “peace dividends”—goodwill among local communities, the return of peace and security, and reconstruction efforts—to strengthen the state, and rebuild trust and social capital. Iraq’s Vision 2030 provides the roadmap to this future. The aspiration is for a “unified, peaceful and secure Iraq, a coherent productive society with a diversified competitive economy in a sustainable environment and good governance with justice and equal opportunities for all.”

**At its heart, Vision 2030 lays out a new social contract with citizens.** This contract will strengthen trust in government, open opportunities for income generation and economic activities, and chart the course for reforms that address the deeply-rooted challenges of the past. The future vision for education is further defined in the eleven goals for education...
Sectoral and Institutional Context

**The education system in Iraq is managed by the Ministry of Education (MOED) through a highly centralized organizational structure.** The MOED is responsible for policy making, planning, financial management, and implementation of education services. The MOED historically maintained full authority on education. Regional offices in each governorate are established, but their roles are limited and mainly serve as a liaison between the schools and the central MOED. Education is structured according to the following levels: basic education (grades 1–6), intermediate education (grades 7–9), and secondary education (grades 10–12).

Overall, Iraq struggles with three key challenges that impact learning outcomes: (1) depleted learning environments (2) insufficient inputs to education; and (3) weak management system. The political-economic environment in Iraq over the last three decades reduced the MOED’s effectiveness in prioritizing learning and learning outcomes. A lack of positioning (establishing learning as the main goal of stakeholders across the education system) and coherence (stakeholders reinforcing each other to achieve learning goals) across the system resulted in a weakened ability to deliver quality services to support children’s educational needs.

1. **Depleted Learning Environments**: Infrastructure damage to the system is extensive and strains the government’s ability to provide equitable access to education for all children.
2. **Insufficient inputs to Education**: For those students able to access and stay in school, shortages of key resources such as teachers, learning materials, and supplies impede learning.
3. **Weak System Management**: Years of conflict and isolation have severely weakened institutional functionality, effectiveness, and governance across Iraq.

Relationship to CPF

The proposed project will support the two focal areas of the Country Partnership Framework (CPF) (FY18–23), approved in April 2018: (1) institutional strengthening and efficiency through economic stabilization and improved. In addition, the proposed project supports the CPF’s three-priority cross-cutting themes of (1) private sector engagement; (2) empowering women and youth; and (3) improving transparency.

**C. Proposed Development Objective(s)**

The proposed project development objective is to restore equitable learning opportunities in pretertiary education.

**Key Results (From PCN)**

- Number of governorates publishing structured and yearly updated education sector plans
- Number of schools using newly developed adaptive teaching strategies in the early years (kindergarten to grade 3), subject to third-party oversight.
- Number of students and IDPs enrolled in project upgraded facilities or programs (disaggregated by gender, disabled students, and single parent households).
D. Concept Description

It should be noted that the project relevance, design, scope, and components are subject to revision based on further discussions with the government of Iraq.

The project will use a long-term innovative development approach that will change and improve education practices in Iraq. This project will focus on key challenges within the sector with emphasis on improving student learning through innovative and sustainable approaches that take into consideration the fragile and continuously changing Iraq context.

The project aims to innovate by targeting and launching approaches that will (1) engage stakeholders such as the private sector and community in the education process; (2) utilize technology for monitoring learning and adapting pedagogical practices; and (3) introduce enhanced management practices for improved results. All approaches will take into consideration the existing local capacity and environment for implementation. The project will invest in strengthening MOED capacity and systems to improve its institutional capacity to plan, monitor, and implement effective reform so that all actors are aligned to work toward the shared goal of improved learning. Finally, flexibility will be a key ingredient during the implementation phase given the need to adjust to the possible changing environment of a post-conflict country.

The proposed project will also build on experiences from past education projects and lessons learned in Iraq and other post-conflict countries. Some of the lessons learned include (1) keeping the project design practical and simple; (2) building on existing initiatives; (3) ensuring full ownership by government partners; and (4) taking into consideration the low institutional capacity of the MOED.

The proposed project would consist of the following three components:

Component 1. Provide adequate learning conditions and opportunities for equitable access

This component will improve equitable and inclusive learning environments, along with access to materials to ensure all students, including those displaced and out of school, have enhanced opportunities for learning. This component will respond to the ongoing emergency of out-of-school children by targeting those students with quality skills training programs. The component will also focus on reconstruction and rehabilitation of schools and education buildings, starting with the areas that have witnessed the highest levels of infrastructure destruction. The proposed project will, where possible, leverage the private sector to help provide learning materials, school furniture, and equipment in a time and cost-effective manner.

This component would include:

Sub-component 1.1: Emergency response to displaced children. The project will finance rapid rehabilitation of schools (in IDP returnee areas), and temporary classrooms where IDPs are housed in camps.

Subcomponent 1.2: Enhance learning opportunities for out-of-school youth. The project will expand access to training and skills programs for out-of-school-youth who cannot re-enter formal education, and hence are considered a

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2 These priority governorates include: Baghdad, Anbar, Najaf (Central Iraq); Basra, Thi Qar, Qadissiya, (Southern Iraq); and, Erbil, Kirkuk, Dohuk and Ninewah (Northern Iraq). To the extent possible, the proposed project will overlap efforts with development partners who are currently operating in Iraq. The identification of sites to be supported through the project will be based on the recent Iraq Damage and Needs Assessment (DNA) conducted by the World Bank, and on regular updates from the MOED, governorates, and humanitarian agencies on the ground, as a substantial number of school facilities are being rehabilitated by various stakeholders active in ISIS-affected areas. Further discussions on the exact governorates will be held with the government considering that the security situation is still evolving.

3 State owned enterprises have the monopoly on the production and delivery of school furniture and equipment. In addition to delays in delivery, and poor design and norms, the material delivered is expensive and of low quality, lasting in many cases for less than a year.
marginalized group.

**Subcomponent 1.3: Recreating school infrastructure for improved learning conditions.** The proposed project will support the rehabilitation and reconstruction of damaged and malfunctioning schools and education facilities.

**Subcomponent 1.4: Modernizing school equipment and furniture for a more adaptive learning environment.** The project will support the design and adoption of new norms and standards for furniture and equipment (including laboratories in secondary schools) that will be used for all subsequent acquisitions by the MOED.

**Component 2. Strengthen Numeracy and Literacy Skills in the Early Years**

This component aims to introduce innovative teaching practices and learning content, materials, and assessment strategies that will transform how students learn basic numeracy and literacy skills in the early years. To mitigate the declining learning outcomes of Iraqi students, it is necessary to support foundational skills from the early years. Therefore, emphasis will be placed on teaching strong literacy and numeracy skills to improve students’ future learning prospects. To strengthen skills acquisition and learning outcomes in the early years, the project will strategically introduce content, tools, and strategies that will disrupt the traditional pace of teaching and learning practices in Iraq, and support a teaching approach that is highly targeted and focused on individualized needs of young learners. This component would include:

**Subcomponent 2.1: Develop interactive materials for early numeracy and literacy.** Learning materials, such as reading and activity books, short video animations, and other innovative materials and tools (digital and non-digital) will be developed and introduced into the classroom to increase exposure of children to child-friendly, and context- and age-appropriate materials.

**Subcomponent 2.2: Strengthen adaptive teaching strategies for early numeracy and literacy.** Innovative approaches of in-service teacher training will be introduced to enhance teachers’ capacity to provide targeted instructional practices that address the varied numeracy and literacy learning needs of students in the early grades.

**Subcomponent 2.3: Institutionalize the use of formative and diagnostic assessments.** The project will support the introduction of formative assessment strategies to help teachers monitor and assess student literacy and numeracy learning progress. Tools such as tablets for monitoring,

**Component 3. Improve management and governance functions for enhanced system performance**

This component will build management capacity at the governorate and school level, and will support activities to improve community engagement in schools. The project will target governorate- and school-level leaders as key agents of change, while fostering improved social cohesion through activities targeted at improving community involvement. Activities will support regional education offices to access information and utilize this information in decision making, planning, and implementation. Activities will also aim to strengthen the role of school principals as managerial and instructional leaders. This training will also address school leaders’ role in engaging communities and building local support for improved learning. With these activities, the aim is to realign local actors toward achieving common goals, while taking into account unique, regional, and local educational needs.

The component will include the following:

**Subcomponent 3.1: Strengthen governorate planning practices.** UNICEF and the World Bank’s Emergency Operations for Development Project additional financing (EODP-AF) project support the development of governorate education
plans in ten governorates.

**Subcomponent 3.2: Enhanced school leadership and community engagement.** This subcomponent will focus on the role of school leaders, and enhancing their capacity in (1) school management; (2) instructional leadership, with a focus on instructional planning, data-driven instruction, and observation and feedback; and (3) community engagement.

**Subcomponent 3.3: Technical assistance and project management.** This subcomponent will include technical assistance for capacity building and development of knowledge for policy decision for MOED officials.

**SAFEGUARDS**

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

The exact locations of the project interventions are still not defined and would likely not be known before appraisal. However, the ESDP is meant to complement the EODP/EODP-AF project that are already currently focusing on ten (10) targeted governorates (Anbar, Diyala, Kirkuk, Salahadin, outskirts of Baghdad, Fallujah, Ramadi, Ninawa, Mosul and few others to identify).

Under the proposed ESDP, the focus is to scale up the development of governorate education plans in the remaining eight (08) others priority governorates, namely: Baghdad, Anbar, Najaf (Central Iraq); Basra, Thi Qar, Qadissiya, (Southern Iraq); and, Erbil, Kirkuk, Dohuk and Ninewah (Northern Iraq). To the extent possible, the proposed project will overlap efforts with development partners who are currently operating in Iraq. The identification of sites to be supported through the project will be based on the recent Iraq Damage and Needs Assessment (DNA) conducted by the World Bank, and on regular updates from the MOED, governorates, and humanitarian agencies on the ground, as a substantial number of school facilities are being rehabilitated by various stakeholders active in ISIS-affected areas.

The common features for all project interventions, except in the emergency response camps where IDPs are being housed, is the strict adherence to pre-existing footprints of buildings, structures and linear infrastructure, which was severely damaged, destroyed, sabotaged and/or stolen during combat activities and occupation by the terrorist groups. The project will reconstruct and rehabilitate affected schools and facilities on land owned by the government, within their existing footprints to avoid any discomfort related to land acquisition.

Most of the foreseen interventions is expected to occur in both urbanized and semi-rural areas, which currently are anticipated to be characterized by very low environmental and social baseline conditions, mainly due to aftermath acts of war and related deterioration and subsequent negligence (such as: rubble and UXO presence, unregulated waste disposal, breakdown of environmental services, and possible presence of contaminations from oil/fuels and ammunitions). All reconstructions and/or rehabilitation activities are expected to be moderate to minor in size and scale, with sizeable risks and impacts, mostly localized and site specific (within existing footprints/premises), and thus foreseen to be easily manageable to a level satisfactory to the World Bank.

**B. Borrower’s Institutional Capacity for Safeguard Policies**

The Ministry of Education has a limited experience in the requirements of proper management of social and environmental safeguards risks and related corporate requirements such as gender and vulnerability inclusion/exclusion, stakeholders consultation and participation, GBV, EHS, labor influx, etc. Past experience on World Bank financed projects revealed that their technical on environmental and social assessment and management is relatively weak and thus
needs further more support. Though the MOED is already part and partial of the ongoing Iraq Emergency Operation for Development Project Additional Finance (EODP-AF), the MOED-PMT designated safeguards specialists (Social and Environmental), unlike the fiduciary (Procurement and FM), have unfortunately not yet benefited a training on World Bank’s operational safeguards policies. Given the high expectations from the Government on the rapid implementation of this important project to re-boost the education sector for Iraquis; and the amount of civil works that would be involved during project implementation (cumulative and exponential coverage), the current PMT safeguards specialist would require much more technical and knowledge support to be up-to the task of properly managing and mitigating anticipated social and environmental risks and impact to the Bank satisfaction. Likewise, the National Environmental Agency technical capacity is also perceived to be similarly weak and would thus in needs of stronger support to play their partition in this endeavor. Consequently, the World Bank team will deploy a two tear approach to bring to speed both the national environmental agency and the MOED-PMT Safeguards teams by (i) undertaking a rapid situational assessment during the preparation stage of this project (next mission in September, 2018), and (ii) craft a rapid-response type of safeguards training to provid the team with the basic luggage, tools and knowledge to jumstart the support of the project on social and environmental safeguards risks and impacts management, including monitoring and reporting.

C. Environmental and Social Safeguards Specialists on the Team

Cheikh A. T. Sagna, Social Specialist
Ehab Mohamed Mohamed Shaalan, Environmental Specialist

D. Policies that might apply

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
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</thead>
<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>Under component 1 (Upgrade learning conditions and enhance the school environment – $USD $245 million), in general, and more precisely under sub-component 1.1 (Emergency response to displaced children – $USD 100 million) and sub-component 1.3 (Recreating school infrastructure for improved learning conditions - $USD 90 million), the Project will involve substantial physical civil works related to the reconstruction and rehabilitation of schools and education buildings, particularly in areas that witnessed the highest levels of infrastructure destructions and damages in Fallujah, Mosul, Ramadi, etc. (i.e. rapid rehabilitation of schools where population have returned, temporary classrooms in IDPS settlement camps, rehabilitation and reconstruction of damaged and malfunctioning early/childhood education and secondary schools, education facilities, offices, laboratories, etc.). Most reconstructions and/or rehabilitation activities are anticipated to be characterized by very low environmental and social baseline conditions,</td>
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</table>
Despite their scattered exponential coverage (8 governorates) they are expected to be limited (management, cleanup, removal and disposal of construction and rehabilitation rubble and debris; UXO presence, unregulated waste disposal, breakdown of environmental services, and possible presence of contaminations from oil/fuels and ammunitions, etc.), and expected to be moderate to minor in size and small in scale, with sizeable risks and impacts, mostly localized and site specific (within existing footprints or premises), and thus foreseen to be easily manageable to a level satisfactory to the World Bank, typical of category B operations. The foreseen socioeconomic and environmental benefits are expected to be bigger and more sustainable as they support equitable access to learning opportunities in much safer facilities and conditions, taking into consideration ecofriendly (solar panels) and disabled-friendly (inclusive access) designs, gender-specific construction requirements (separate bathroom facilities in coeducational schools) with improved designs compatible to international standards (newly equipped and furnished classrooms) and help create a rather conducive and forward looking learning environment (i.e. green spaces, light-filled rooms, playgrounds, etc.).

The project has triggered three (03) safeguards policies, namely Environmental Assessment (OP/BP 4.01), Physical Cultural Resources (OP/BP 4.11) and Involuntary Resettlement (OP/BP 4.12) in light of the planned activities under Component 1. The Environmental Assessment policy (OP/BP 4.01) is triggered for the abovementioned reasons and foreseen adverse risks and impacts. Because at this very juncture, none of the sites’ physical footprints have been identified and will likely not so be prior to appraisal, the Borrower will prepare an Environmental and Social Management Framework (ESMF) to set forth basic guidelines (i.e. general measures to screen, assess, avoid, minimize and mitigate potential adverse impacts routinely associated with construction activities of the foreseen scale) Borrower will follow during project implementation to prepare site specific environmental and social management plans (ESMPs). Likewise, to set a baseline on the magnitude of social aspects involved in the project, a comprehensive social
assessment (SA) will be conducted by the Borrower to set forth the basic criteria to measure and better guide the project real impacts on the beneficiary communities. The preparation the ESMF and the SA will involve extensive consultation with and participation of various stakeholders and publicly disclosed both in-country and at the World Bank website prior to project appraisal. Likewise, during implementation, site-specific ESMPs will follow the same process (i.e. be produced, cleared by the Bank, and publicly disclosed both in country and on the World Bank website before the start of physical civil works).

<table>
<thead>
<tr>
<th>Performance Standards for Private Sector Activities OP/BP 4.03</th>
<th>No</th>
<th>The Performance Standard is not triggered as no financial intermediary (FI) is foreseen to be associated in this project.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Habitats OP/BP 4.04</td>
<td>No</td>
<td>The policy is not triggered because no sensitive or protected habitats are expected to be affected.</td>
</tr>
<tr>
<td>Forests OP/BP 4.36</td>
<td>No</td>
<td>The Policy is not triggered because no forests or forested land plots are expected to be affected within or in the nearby vicinity of the project boundaries.</td>
</tr>
<tr>
<td>Pest Management OP 4.09</td>
<td>No</td>
<td>The policy is not triggered as none of the foreseen investments would justify the use of pesticides.</td>
</tr>
<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>Yes</td>
<td>Iraq is a country extremely rich in Physical Cultural Resources (PCR), and the destruction experienced during combat activities between ISIS and Coalition forces are highly likely to have affected historical buildings, religious sites such as mosques and shrines, and monuments. Destruction may have been random acts of war, but also targeted acts of sectarian violence. “Chance-finds” procedures will be embedded in the ESMF to help deal more effectively with PCR issues whenever encountered during project implementation.</td>
</tr>
<tr>
<td>Indigenous Peoples OP/BP 4.10</td>
<td>No</td>
<td>The Policy is not triggered as there are no indigenous peoples as defined by the policy in the project intervention areas in Iraq.</td>
</tr>
<tr>
<td>Involuntary Resettlement OP/BP 4.12</td>
<td>Yes</td>
<td>Under component 1 (Upgrade learning conditions and enhance the school environment – $USD $245 million), in general, and more precisely under sub-component 1.1 (Emergency response to displaced children – $USD 100 million) and sub-component 1.3 (Recreating school infrastructure for improved learning conditions - $USD 90 million), the Project will involve substantial physical civil works related to the reconstruction and rehabilitation of schools and</td>
</tr>
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</table>
The impacts from the education buildings and facilities, which impacts are expected to be limited and mostly site specific, easily manageable. As a general principle, all activities are planned to take place on existing footprints and premises. Nevertheless, there is a small possibility that reconstruction works may temporarily affect access to livelihoods or nearby residences, or require temporary use of private land in the nearby vicinity. Hence this policy is triggered as a precautionary measure to anticipate any of such encounter, especially during project implementation that would then trigger a tier-1 restructuring. Because at this very juncture, none of the sites’ physical footprints have been identified and will likely not so be prior to appraisal, the Borrower will prepare a Resettlement Policy Framework (RPF) to set forth basic guidelines (i.e. general measures to screen, assess, avoid, minimize and mitigate potential adverse impacts routinely associated with land acquisition resulting in the loss of property, assets and source of income or livelihood leading to the payment of compensation whether or not project affected person may have to physically move) Borrower will follow during project implementation to prepare site specific Resettlement Action Plan (RAPs). The preparation the RPF will involve extensive consultation with and participation of PAPs and various other stakeholders (i.e. host communities) and publicly disclosed both in-country and on the World Bank website prior to project appraisal. Likewise, during implementation, site-specific RAPs will follow the same process (i.e. be produced, cleared by the Bank, and publicly disclosed both in country and on the World Bank website before the start of physical civil works).

<table>
<thead>
<tr>
<th>Policy Description</th>
<th>Triggered</th>
<th>Summary</th>
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<tr>
<td>Safety of Dams OP/BP 4.37</td>
<td>No</td>
<td>The policy is not triggered as the project will not finance dam works or activities associated to existing dam.</td>
</tr>
<tr>
<td>Projects on International Waterways OP/BP 7.50</td>
<td>No</td>
<td>The policy is not triggered as there are no activities related to international waterways in the project.</td>
</tr>
<tr>
<td>Projects in Disputed Areas OP/BP 7.60</td>
<td>No</td>
<td>The policy is not triggered as the Project is not located in a disputed area as defined by the policy.</td>
</tr>
</tbody>
</table>
E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

Aug 15, 2018

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

July 17, 2018

CONTACT POINT

World Bank

Kamel Braham, Manal Bakur N Quota, Nathalie Lahire
Program Leader

Borrower/Client/Recipient

Republic of Iraq

Implementing Agencies

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Ministry of Education - Education Project Management Team (MOED-PMT)
Majed Ameen
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APPROVAL

Task Team Leader(s): Kamel Braham, Manal Bakur N Quota, Nathalie Lahire

Approved By

<table>
<thead>
<tr>
<th>Safeguards Advisor:</th>
<th>Brandon Enrique Carter</th>
<th>12-Jul-2018</th>
</tr>
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<tbody>
<tr>
<td>Practice Manager/Manager:</td>
<td>Safaa El Tayeb El-Kogali</td>
<td>13-Jul-2018</td>
</tr>
<tr>
<td>Country Director:</td>
<td>Claire Kfouri</td>
<td>18-Mar-2019</td>
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