

**COMBINED PROJECT INFORMATION DOCUMENTS / INTEGRATED
SAFEGUARDS DATA SHEET (PID/ISDS)
APPRAISAL STAGE**

Report No.: PIDISDSA16511

Date Prepared/Updated: 26-Jan-2016

I. BASIC INFORMATION

A. Basic Project Data

Country:	Lesotho	Project ID:	P156001
		Parent Project ID (if any):	
Project Name:	Lesotho Education Quality for Equality (P156001)		
Region:	AFRICA		
Estimated Appraisal Date:	10-Feb-2016	Estimated Board Date:	26-May-2016
Practice Area (Lead):	Education	Lending Instrument:	Investment Project Financing
Sector(s):	General education sector (60%), Secondary education (40%)		
Theme(s):	Education for all (80%), Education for the knowledge economy (20%)		
Borrower(s):	Ministry of Finance		
Implementing Agency:	Ministry of Education and Training		
Financing (in USD Million)			
	Financing Source	Amount	
	BORROWER/RECIPIENT	0.00	
	International Development Association (IDA)	25.00	
	Total Project Cost	25.00	
Environmental Category:	C - Not Required		
Appraisal Review Decision (from Decision Note):	The review did authorize the team to appraise and negotiate		
Other Decision:			
Is this a Repeater project?	No		

B. Introduction and Context

Country Context

1. The Kingdom of Lesotho is shifting its economic model from a largely public sector–driven to export-led to reduce poverty and promote more equally shared prosperity. The small mountainous country that is landlocked by South Africa has a population of roughly 2 million. Its per capita gross national income is US\$1,550 but it has only a few manufacturing sectors acting as drivers of growth, such as textiles. Its main exports are textiles, water, and diamonds. As a member of the Common Monetary Area, its currency is pegged to the South African rand. Lesotho is also part of the Southern African Customs Union, a union between Botswana, Lesotho, Namibia, South Africa and Swaziland by which members pool the customs duties and excise taxes they collect and redistribute the funds among the five member states.

2. Lesotho faces entrenched inequality and deep poverty, despite having achieved middle-income status. The average annual gross domestic product (GDP) growth rate was around 4 percent per capita over the past decade. However, poverty is widespread, persistent, and deep, especially in rural areas. The poverty rate has remained unchanged since 2003, about 57 percent, while inequality increased from a Gini coefficient of 0.51 to 0.53 in the same time period. Lesotho has a very high poverty gap of about 30 percent in 2010 for a country of its income level and fares worse than most African countries in relation to shared prosperity. There is a strong geographic pattern to poverty incidence, as more than half of the population lives in remote and difficult to access mountainous areas.

3. Human development outcomes in Lesotho are far below average for the region and its income level. In 2014, Lesotho ranked 162 out of 187 countries on the Human Development Index. Lesotho has the world's second highest adult HIV/AIDS prevalence rate at about 23 percent in 2013, low life expectancy at 49 years, an infant mortality rate of 69 per 1,000 live births, and low primary completion, at only 64 percent in 2014. The adult literacy rate in Lesotho of 76 percent in 2009 is above the average of 60 percent (2010), but has fallen from the rate of 86 percent in 2000.

Sectoral and institutional Context

4. Lesotho has made substantial gains in education service delivery with the introduction of free primary education on a phased basis between 2000 and 2006. Nearly all children start out attending school in Grade 1 (see figure 1) and approximately 67 percent of children are still in school by the end of primary school (Grade 7), which is up from 41 percent in 2006. For the proportion of children who do not enter any schooling in Lesotho (4.5 percent), gender and, more importantly, geographic location matters. Unlike most African countries that struggle with education access for girls, Lesotho has stronger access rates for girls due to the economic and cultural practice of herding among boys. Looking at profiles of children under 15 years of age, 2 percent of girls and 5 percent of boys never enrolled in school. In the very mountainous districts of Thaba-Tseka, Quthing, and Mokhotlong, the proportion of children not entering school is much higher at 7.6 percent, 7.7 percent, and 9.9 percent, respectively. Males in Quthing and Thaba-Tseka are particularly disadvantaged with 11 percent of boys not accessing schooling in both districts in comparison with 3–4 percent of girls.

5. Public spending for education is very high, but overall resource efficiency is low. Lesotho spends 8.4 percent of its GDP on education, which is the highest among 16 southern African countries. However, despite the high public spending on education, it can offer only 1.33 years of schooling for every 1 percent of GDP spent in comparison to the regional average of 2.31 years and 3.8 years in countries like Madagascar. Therefore, the efficiency of resource utilization in the education sector is low. Taking into account the level of economic development and the share of rural population, Lesotho spends an estimated 40 percent more than countries in similar

circumstances in providing comparable educational coverage. The high cost of labor continues to be problematic with the increasing teachers' wage bill, and the student grants for higher education place additional stress on the education budget.

6. The education system is not equipping students with skills needed for the labor market. Lesotho's inefficient and low-quality primary and secondary education system is not conducive to the goal of inclusive growth and contributes to the country's high unemployment rate of 25 percent. High levels of repetition and dropout at primary and junior secondary (see figure 1 and table 1) suggest that children are not acquiring the basic skills that lay the foundations of future learning. The absence of a sound basic education impedes further development of technical and professional skills at postsecondary levels and hinders the ability to participate in the economy. The low quality of mathematics and science education implies that secondary school graduates are ill-prepared for higher education/training in the science, technology, engineering, and mathematics areas, where skills are greatly needed for economic growth.

i. Key Challenges

7. Poor retention rates in primary and junior secondary are serious system weaknesses. Despite 95.5 percent access to Grade 1, only 62 percent of students go on to complete primary school. This problem of retention continues into secondary school where retention rates are 75 percent in junior secondary and 80 percent in senior secondary. Only about 42 percent of the cohort that enters Grade 1 completes junior secondary school and 30 percent completes senior secondary school. The poor retention rates suggest a high number of dropouts over the schooling cycle. However, Lesotho presents an education paradox: contrary to the experience of other developing countries where students tend to dropout in the passage between two cycles of study, Lesotho has high transition rates. There is a high likelihood of students who successfully pass the 7th grade exam and 10th grade exam enrolling in junior secondary and senior secondary respectively as seen by a transition rate of 91 percent from primary to junior secondary and 90 percent between junior secondary and senior secondary. Hence, the problem of retention occurs within the different cycles of study rather than between them. There is a consistent and unhealthy trend of student dropouts over the schooling career.

8. Late entry and high repetition rates throughout the primary cycle contribute to overage students and poor retention. Although 6 is the official age of school entry, only 39 percent of six-year-old children are enrolled in school. However, the enrollment rate jumps to 80 percent for seven-year olds, 86 percent for eight-year olds, and 90 percent for nine-year olds. Anecdotal evidence suggests that children enroll in Grade 1 late due to parental perceptions and long distances to school. According to the ongoing education sector diagnostic, most primary dropouts typically occur after the age of 12 years (or after Grade 4) after a few grades of repetition. At age 12, 5 percent of kids who were enrolled have dropped out and less than 30 percent are in the appropriate grade level. Looking at older students, 18 percent of 15-year olds, whose appropriate grade level is Grade 10, have dropped out of school and a large majority (69 percent) are still in primary school. Fifty-four percent of 18-year olds, who should have completed their schooling, are still in school, a third still in primary grades.

9. Certain characteristics place students at a higher risk of dropping out of primary school, with gender, economic status, and geography, all impacting student retention. According to 2010 household survey data, at the primary level, 40 percent of students from rural areas in comparison to 17 percent from urban areas dropout of primary school before reaching Grade 7. Gender is also significant with 27 percent of girls and 43 percent of boys not completing Grade 7, but the impact of gender is smaller than the distinction between urban and rural. Very strong disparities are identified across the varying districts in Lesotho; 68 percent of children in Mokhotlong and 46.5 percent of children in Thaba-Tseka, both mountainous districts, drop out at the primary level.

Poor children are also more likely to drop out. As such, the causes of student dropouts are unknown. Statistics show a large number of overage children in the primary grades and anecdotal information suggests that boys abandon primary school to engage in herding activities. Thus, a diagnostic study identifying the reasons for dropouts in primary school is needed to better understand the issue.

10. For secondary education, the fee policies at secondary level and lack of secondary schools in remote rural areas contribute to lowering demand and access for education among the poorest families. The average household's share of education costs is the highest in Sub-Saharan Africa. Households contribute up to 49 percent of total expenditures for junior secondary education and 44 percent for senior secondary education, compared with 30 percent for primary and 22 percent for tertiary. Secondary education costs parents between M 2,600 (US\$281) and M 4,200 (US\$545), roughly comparable to four months' family income. Comparatively few children receive scholarships—22 percent at junior secondary and 40 percent at senior secondary, compared with 60 percent in higher education. The textbook rental scheme and need for boarding cause additional financial burdens on poor students attending secondary school. Overall, poor students and students belonging to rural areas are underrepresented in secondary schools. The districts with the most mountainous areas also have the lowest schooling profiles for junior secondary schools.

11. Even for students who initially access secondary education, retention continues to be a challenge at the secondary level in Lesotho. According to 2013 administrative data, the overall repetition rate for secondary school is just slightly different than in primary school with repetition at 14.9 percent in junior secondary and 12.7 percent in senior secondary (table 3). Grades 9 and 11 face the highest repetition rates in the entire system at 20 and 19.6 percent, respectively, while Grade 10 has the highest dropout rate at 17.6 percent. Taking into account both dropouts and repetition, it is estimated that roughly a quarter of the public resources mobilized for secondary school are wasted in Lesotho.

12. With regard to primary quality, Lesotho lags behind the regional average in both reading and mathematics. The 2007 Southern and Eastern Africa Consortium for Monitoring Educational Quality (SACMEQ) III average scores for Grade 6 students indicate that the level of learning of Basotho students in primary education is the third lowest among 14 countries in the southern African region in spite of slight improvement since 2000. More specifically, Lesotho is the third lowest country in English reading performance and fourth lowest in Mathematics performance.

13. Primary school quality is influenced by a student's geography and social status, and classroom resources. Almost all of the poorest performing schools belong to rural areas and approximately 60 percent are located in mountainous regions. On average, only about 65 percent of students pass the Primary School Leaving Examination (PSLE) in these schools, where the average dropout rate is 17.9 percent and average percentage of repeaters is about 14 percent compared to national averages of 9 percent each, respectively. Students in the poorest performing schools also typically belong to lower income backgrounds. Analysis of the national learning assessment results in Grades 4 and 6 shows that student absenteeism, poverty, and geography negatively impact student learning in Lesotho.

14. Secondary education also faces serious challenges in terms of student learning outcomes, particularly in Mathematics and Science, but not much data is available. Students enter junior secondary school with low learning levels in Math and Science. According to the 2015 PSLE results, of the 40,063 candidates who sat for the PSLE taken in Grade 7, more than 25 percent failed in Mathematics, about 16 percent failed in Science, less than 22 percent obtained first class pass in Mathematics, and about 16 percent obtained first class in Science. Although the exam pass rates at the end of the lower and upper secondary cycles have improved over the past few

years, they are still relatively low, at respectively 70 percent for the Junior Certificate Exam and 50 percent for the General Certificate of Secondary Education in 2014. In the Junior Certificate Examination, only 20 percent of students passed Mathematics and only 23 percent of students passed Science, in comparison to 41 and 79 percent pass rates for English and Sesotho, respectively. Only about 14 percent of upper secondary school students passed Mathematics on the General Certificate of Secondary Education, at the end of the last grade of secondary education. With low learning outcomes in secondary school, students face difficulties in being prepared for further skills development in TVET and tertiary education. The poor performance of secondary students in Mathematics and Science is linked to several interrelated areas, including (a) the level of preparedness of students when leaving primary school, (b) a lack of clear learning outcomes and sequencing between primary and secondary curriculum, and (c) the quality of secondary Mathematics and Science teaching, including a very limited supply of learning and teaching materials. Regular quality monitoring of secondary education and remedial action are made difficult by the lack of a student learning assessment system at the secondary level, in contrast to primary, for which MoET has established a good system of student assessment.

15. Overall, the low levels of learning achievement in primary and secondary schools in Lesotho can be traced to several education service delivery factors as follows:

(a) Low levels of teacher productivity. High-achieving education systems ensure that the right people become teachers and are regularly in classrooms teaching where they are needed. Teacher absenteeism in Lesotho remains problematic, especially in more remote rural areas. For primary schools, data from the 2014 Education Service Delivery Survey found that approximately 75 percent of teachers were present at the beginning of the school day in remote schools, which was confirmed by a 2012 United Nations Educational, Scientific, and Cultural Organization (UNESCO) study. Similarly, 70 percent of teachers are regularly present at secondary schools based on a small sample size where records were available. The survey also found that on average, 40-minute classes ended 6 minutes early and approximately 10 minutes of every 40-minute class period were wasted with no instructional activity. This is closely linked to limited accountability mechanisms at the school and district levels. Not all schools have functioning mechanisms for documenting, sanctioning, and monitoring teacher tardiness and absenteeism; so, the full extent of the problem is difficult to ascertain.

(b) Low teacher pedagogical competency and subject mastery. High-performing systems that facilitate high levels of student learning achievement acknowledge how critical it is to have well-prepared teachers to enter the classroom, and ensure ongoing professional development to further raise the level of competencies. According to the SACMEQ III data, a random sample of Grade 6 teachers scored poorly on the same Math and English assessments given to students. In particular, 69 percent teachers from a random sample of Grade 6 teachers have critical reading skills and only 34 percent were competent in numeracy, suggesting that teachers' content knowledge is problematic. Adequate in-service training is also lacking in primary schools, particularly for those in remote areas. Despite the frequency of overage learners and multigrade classes in Lesotho, teachers are ill-equipped to deal with the wide age range of students in a class and handle multigrade teaching. In terms of inspection, 60 percent of rural primary school teachers reported never having been visited by the inspectorate for a classroom observation and an additional 19 percent had not been visited by the inspectorate for two or more years. This suggests that a more systematic approach to teacher accountability and in-service support for teachers (through continuous professional development and school inspections) may need to be adopted, particularly as the quality of primary education directly impacts the quality in junior secondary school.

(c) Inadequate resources for teaching. The research evidence that the use of textbooks has a

significant impact on student learning is considerable since they are the main vehicle for conveying the curriculum. Their impact tends to be stronger when there are supplementary reading materials available and when teachers have guidebooks. New technologies are also changing the way teaching and learning take place with more digital content available. Based on school visits, primary schools have received and are using new textbooks for Grades 1–4 from the previous Global Partnership for Education (GPE) project but do not have any supplementary materials that help build the foundations of literacy. A number of secondary schools were lacking textbooks in some of the subjects. Reasons cited in some of the cases is that parents had not paid fees for the book rental scheme. In secondary schools, the lack of materials to undertake more experimental work, especially in the sciences, was also problematic for learning. Anecdotal feedback from school visits noted that science labs were in poor condition, with outdated chemicals and neglected spaces and materials.

ii. Government Efforts to Address Key Challenges

16. Several measures have been implemented by the government over the past few years to address the challenge of primary and secondary access and quality. In 2013, early learning standards were developed, a review of the basic education curriculum and assessment began, and the O levels were localized. The government also introduced a child-friendly schools (CFS) initiative and a national school feeding policy. On top of that, the recently completed US\$20 million GPE project implemented various primary and pre-primary education initiatives: (a) Over 1 million new textbooks, teachers' guides, and assessment materials were distributed based on a new simplified curriculum focused on early grade reading and math; (b) A pilot assessment of early grade literacy and numeracy was recently completed to serve as a baseline for later evaluations of learning quality; (c) One hundred and forty pre-primary reception classes were established and supported by the project, nearly doubling the number nationwide; (d) Several studies were financed by the project, the results of which continue to support the MoET in future strategic planning, including a pilot assessment of early grade literacy and numeracy, an impact evaluation on the teacher incentives scheme, and a Teacher Qualifications Framework study; (e) An additional 143 classrooms were constructed providing greater access to primary school in remote areas. The recent strides in improving access and simplifying the curriculum for greater relevance, in addition to the phasing out of the Grade 7 high stakes examination, show Lesotho's commitment to improve the primary school completion rate. The support to the teaching and learning environment in the proposed project would complement these recent gains and both deepen the focus on education quality while expanding the scope to include secondary education.

17. The government is currently working with the World Bank and other partners on analytical work to support evidence-based solutions to the education sector in early childhood development and non-formal education (NFE), and some construction work for new schools and facilities. The World Bank is supporting ongoing analytical work to help the government better understand the learning outcomes of the different models of early childhood service delivery in order to help inform investment for scaling up nationwide. United Nations Children's Fund (UNICEF), the primary funder of non-formal education (NFE) programs for boys who drop out of school to herd cattle, has also undertaken analytical work on the extent and impact of the NFE programs to reach out-of-school boys. In addition, it is supporting data collection by EMIS and sensitizing inspectors, District Resource Teachers (DRTs) and teachers on CFS. UNESCO is assisting MoET through the establishment of mobile libraries, community radios, and community learning centers for ECCD, literacy and TVET apart from providing entrepreneurship training and supporting math and science education for females. In terms of construction, the government is being supported by funds from the African Development Bank (AfDB) for the construction of secondary school classrooms, mathematics and science laboratories, and dormitories. China and

the Japanese International Cooperation Agency (JICA) have also financed similar construction activities with the former constructing new government high schools and a Leribe TVET institution and the latter constructing eight new secondary schools and renovating four existing schools.

18. In addition, several other related IDA projects under preparation will contribute to address key challenges in education access and efficiency, notably the Transport, Social Protection, and Governance Projects, and a potential International Finance Corporation financed electricity project with a community component. More specifically, the IDA-financed Bank Transportation project is expected to contribute to improving pupils' access to schools by developing better local access roads and small bridges in remote mountain communities. To support access to secondary for the poorest families, a Bank Social Protection program is expected to evaluate the existing orphan and vulnerable children (OVC) bursary and child grants programs (CGPs) and reform the scheme to improve its targeting mechanism to assist with the direct and indirect costs and promote accessibility of secondary school, thereby addressing some demand-side constraints. Moreover, a Bank Governance Project will work closely with the MoET to support the development of an electronic Human Resource Management System for teachers at the national and district levels, and undertake a teacher headcount to strengthen teacher management, among other activities. Lastly, the International Finance Corporation (working together with the Bank education team) is currently exploring the possibility of proposing a private sector-led solar power project with a concessional component on community engagement, which could include support for setup and maintenance of solar power for rural schools and communities.

19. Ensuring all students complete quality basic education is required to help Lesotho diversify its economy and address its social challenges. To achieve universal primary completion, it is therefore essential to address dropout from primary and junior secondary for the most disadvantaged students. By focusing on the schools and groups most at risk (remote rural schools, lowest economic quintile), the government is better placed to ensure that all students, regardless of socioeconomic status, can complete quality basic education (seven years of primary plus three years of junior secondary), equipped with foundational skills to enter the world of work or senior secondary education. The following steps need to be taken to address these challenges:

(a) Enabling students to continue primary education. Though additional classrooms have been built, education coverage and retention in school remain critical challenges. Thus, a concerted approach is needed, including (i) ensuring easier access to schools for teachers and young students in remote rural areas; (ii) better understanding and measures to address dropouts based on school-specific analysis; (iii) greater knowledge of NFE opportunities to reach out-of-school children, including herders.

(b) Improving quality in primary and junior secondary education. With low teacher productivity, low teacher competencies, and few classroom resources, a comprehensive approach is needed to improve quality, including enhanced teacher training and support mechanisms, provision of materials (including Information and Communication Technology [ICT] options), and prioritizing school accountability and leadership to assure that teachers are present in school and well prepared for teaching. Upgrading of the Mathematics and Science curricula, pedagogical practices, and classroom resources is needed in junior secondary to adequately prepare students for future education or the labor force.

(c) Enabling greater access to junior secondary education. Poor students are not able to access or continue junior secondary education due to geographic and high direct and indirect costs of schooling. Thus, it needs to be ensured that junior secondary school is affordable for the most disadvantaged students.

C. Proposed Development Objective(s)

Development Objective(s)

The Project Development Objective (PDO) is to improve basic education service delivery and student retention in targeted schools.

Key Results

The proposed PDO Level Results Indicators (PDIs) include the following:

- (a) Improvement in teacher presence/attendance in targeted schools
- (b) Improvement in teacher content knowledge effectively monitored through teacher competency tests
- (c) Reduction in the dropout rate (Grade 1–Grade 6) in targeted primary schools
- (d) Reduction in the dropout rate (Grade 8–Grade 9) in targeted junior secondary schools

D. Project Description

Project Description

The project will build upon the foundations laid by the GPE Basic Education project (2010–2015) on primary quality and efficiency to improve the delivery of literacy and numeracy education at the primary level, the delivery of Math and Science education at the lower secondary level, and the retention of students in basic education. The project will achieve these goals through three components. While some activities will be implemented at the national level, most of the project interventions are focused on supporting a pilot program in 300 targeted low-performing primary schools and in 65 junior secondary schools in the same catchment areas.

Component Name

Component 1: Improving the teaching and learning environment in targeted primary and junior secondary schools

Comments (optional)

The objective of this component is to raise the quality of classroom service delivery at both the primary and junior secondary school levels to help create a youth population with strong foundations in literacy, numeracy, and reasoning skills.

Component Name

Component 2: Strengthening school accountability for student learning and retention in targeted schools

Comments (optional)

This component aims to empower key actors at the school level—School Boards—to collectively deliberate on and carry out actions that contribute to retaining students and enabling them to learn.

Component Name

Component 3: Strengthening Institutional Capacity and Project Management

Comments (optional)

This component will focus on strengthening and developing the capacity of MoET, particularly the Department of Planning (DoP), for delivering its agenda, supporting project implementation activities, and for project management

Component Name

Unallocated

Comments (optional)

Approximately 5 percent of project financing will be unallocated. These funds can be used to cover cost overruns or as a contingency for unforeseen costs related to project activities deemed necessary to reach the PDO.

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

Ten districts of Lesotho

F. Environmental and Social Safeguards Specialists

Kisa Mfalila (GEN01)

Majbritt Fiil-Flynn (GEDDR)

II. Implementation**Institutional and Implementation Arrangements**

The Project will utilize the same implementation arrangements as the GPE funded FTI-III Basic Education Project supervised by the Bank, which closed in April 2015. The three components will be coordinated and supervised by a MoET integrated facilitation unit which was set up during Mid-Term Review of the FTI-III project in close collaboration with the respective national and regional structures of the MoET. The PFU is a small, full-time project coordination unit integrated into the MoET with a project coordinator and technical support on administration, procurement, FM, planning, monitoring and evaluation, and communication. The PFU will report directly to the Director of Planning (DoP) who will ensure a close collaboration with the other departments of the ministry at central and district level. Under supervision of the DoP, the PFU will be responsible for day-to-day coordination of project activities and reporting on the project performance. Each component (or subcomponent) will be implemented by MoET departments as follows: (a) Component 1: Primary and Secondary, Curriculum and Assessment, (b) Component 2: Primary and Secondary, Teaching Services, Central Inspectorate, and (c) Component 3: Planning. These departments will lead the activities with close support from the PFU. This arrangement will continue enhancing the capacity of MoET in project management, implementation, and planning/monitoring. An Operations Manual will clarify the roles and responsibilities of the parties involved in project implementation.

III. Safeguard Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	No	There will be no construction or rehabilitation activities under the proposed project. The Project's Operational Manual, as well as the manual for the school improvement plans will include specific language regarding the ineligibility of civil works under the project.
Natural Habitats OP/BP 4.04	No	The project will not finance activities in or in vicinity

		of natural habitats and no impacts are foreseen on natural habitats as a result of this project.
Forests OP/BP 4.36	No	The civil works of the project are within the existing lower secondary schools and will not affect forests.
Pest Management OP 4.09	No	The project will not finance activities involving the purchase, storage or use of pesticides.
Physical Cultural Resources OP/BP 4.11	No	The project activities will not be carried out in historical areas or areas with Physical Cultural Resources. However, the ESMF will include chance find procedures for construction contracts.
Indigenous Peoples OP/BP 4.10	No	The are no indigenous people in the project implementation areas.
Involuntary Resettlement OP/ BP 4.12	No	The project activities will be implemented on existing lower secondary schools on land that is owned by school owners. Therefore, the project activities will not entail land acquisition or involuntary resettlement of people. A Resettlement Policy Framework will be prepared during project preparation and publicly disclosed in Lesotho and in the Bank InfoShop following public consultations.
Safety of Dams OP/BP 4.37	No	The project will not support the construction of new dams or entail rehabilitation of existing dams.
Projects on International Waterways OP/BP 7.50	No	The project will not support activities located on international waterways or that entail withdrawal of substantial quantity of water or affect the quality of such waterways.
Projects in Disputed Areas OP/ BP 7.60	No	The project is not located in disputed areas.

IV. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:
Not Applicable
2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
Not Applicable
3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
Not Applicable
4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.
Not Applicable
5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure

on safeguard policies, with an emphasis on potentially affected people.
Not Applicable

B. Disclosure Requirements

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.
If in-country disclosure of any of the above documents is not expected, please explain why:
Not Applicable

C. Compliance Monitoring Indicators at the Corporate Level

The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [] No [] NA []
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [] No [] NA []
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [] No [] NA []
Have costs related to safeguard policy measures been included in the project cost?	Yes [] No [] NA []
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [] No [] NA []
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [] No [] NA []

V. Contact point

World Bank

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VI. For more information contact:

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VII. Approval

Task Team Leader(s):	Name: Harisoa Danielle Rasolonjatovo Andriamihamina	
<i>Approved By</i>		
Safeguards Advisor:	Name: Kisa Mfalila (SA)	Date: 24-Feb-2016
Practice Manager/ Manager:	Name: Andreas Blom (PMGR)	Date: 26-Feb-2016
Country Director:	Name: Asli Senkal (CD)	Date: 22-Mar-2016