



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Nigeria	AFRICA WEST	P177940	
Project Name	Umbrella Organization to Support NFWP		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Sustainability and Inclusion	Investment Project Financing		12/6/2021
Borrower(s)	Implementing Agency(ies)		
Plan International Nigeria	Plan International Nigeria		

Proposed Development Objective

Financing (in USD Million)	Amount
Total Project Cost	4.48

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

No

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

D. Environmental and Social Overview

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

Nigeria is central to the World Bank’s mission of eliminating global poverty. A multi-ethnic and diverse federation of 36 autonomous states, Nigeria is Africa’s largest country (over 200 million people) and largest economy (nominal gross domestic product (GDP) of around USD405 billion in 2020). With an abundance of resources and a young and dynamic society, it has the potential to be a giant on the global stage. But with over 40 percent of its population (over



80 million people) in poverty, Nigeria is also among the countries with the largest number of people living below the poverty line.

The current government has sustained previous momentum and has shown a strong commitment to improve the living conditions of Nigerian women, particularly through the Nigeria for Women Project (NFWP - P161364). The Government of Nigeria has also established the World Bank supported NFWP with an objective to support women's improved livelihood opportunities in targeted communities of Nigeria. NFWP proposes to demonstrate the impact of a multi-dimensional and a medium to long-term approach to overcome the main institutional and market failures limiting women's economic outcomes in Nigeria. While the NFWP is a Federal Program, it is being implemented in five States (Abia, Taraba, Ogun, Niger, and Kebbi) and three LGAs per State based on agreed set of criteria.

Gender-based violence (GBV) like in other jurisdictions, remains a challenge in Nigeria significantly constraining women's autonomy and life chances. The 2018 Demographic Health Survey indicates that nationally 31 percent of women between the ages of 15 and 49 have experienced some form of physical or sexual violence and 14 percent experienced physical violence within the 12 months before the survey, up from 28 percent and 11 percent, respectively, in the 2013 DHS. Fifty-five (55) percent of women who experienced violence never sought help or told anyone about the violence. Besides interpersonal and sexual violence, child marriage and female genital mutilation are the other harmful cultural practices prevalent across Nigeria. Conflict in the northeast has further contributed to a steep rise in targeted violence against women and children by Boko Haram increasingly for abduction and violence. Women are increasingly being used as instruments of war, including suicide bombing and forced marriages, making them vulnerable to stigmatization and rejection from their families and communities.

The Bill and Melinda Gates Foundation is partnering with the World Bank to support the implementation of the NFWP through the Trust Fund "Support for Women's Social and Economic Empowerment through the NFWP" which is funding this small IPF operation.

The project interventions will be implemented in five participating states; Abia, Kebbi, Niger, Taraba and Ogun. No salient environmental features are relevant as the proposed activities support by Plan International will be implemented outside any environmentally sensitive areas. Activities promoted under this intervention will include technical support through trainings, capacity building and advisory services.

D. 2. Borrower's Institutional Capacity

The implementing agency, Plan International Nigeria was identified through a competitive call for proposals in September 2021. Plan International Nigeria is an independent non-governmental organization implementing projects, carrying out research and influencing policy and practice— from the community to the national level in Nigeria. Plan International Nigeria has been operating since 2014 and has considerable experience in livelihood, health, GBV, child protection, life skills for youth, women's leadership, community mobilization, and capacity building for community institutions. Plan International Nigeria implements projects on health (maternal, newborn, and child health, and sexual and reproductive health and rights, nutrition), livelihoods, GBV in humanitarian and development settings. Project technical leads are further supported by highly qualified management, operations, finance, and compliance teams. Plan International Nigeria has developed strong relationships with stakeholders, including local, state, and federal governments, CSOs, community groups, and direct beneficiaries.

Plan International Nigeria has strong internal systems, policies and procedures in place related to grant management, financial compliance, technical quality assurance, M&E, knowledge management, reporting, procurement, environmental sustainability, and risk management.



The firm has appointed two staff as focal persons, an Environmental and a Social Officer to support the ESF requirement of the project. The Environmental Officer has previously participated in an ESF training organized by the Bank. Nonetheless, the Bank E&S Specialist will support the above staff members in the preparation of the Environmental and Social Commitment Plan (ESCP), Labour Management Plan (LMP) and Stakeholder Engagement Plan (SEP), including capacity building and training on the relevant ESF requirements as specified in the ESCP.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Low

The project is not expected to have any adverse environmental impacts as the activities are of technical assistance nature, therefore the environmental risk is low. There are no activities planned that have a physical footprint and / or environmental dimensions and implications resulting from the proposed activities. The activities supported are mainly trainings and business advisory support, communications campaigns, etc. for WAGs and their communities. The project will not invest in any actions to improve service delivery quality like communications services, building maintenance and other physical infrastructure facilities that may cause, from its implementation, adverse impacts to environment and/or ecosystems. Implementation risk includes Occupational Health and safety of project workers and beneficiaries because of the risk of spread of COVID-19 during the capacity building and advisory services for selected women beneficiaries of NFWP

Social Risk Rating

Moderate

The social risk rating is classified as Moderate given the anticipated risks and impacts. The intervention will overall have a positive impact. The project type and nature itself constitute a low social risk, as the activities supported are limited to deployment of technical experts to support NFWP at the Federal and State levels, health and GBV training and communications for WAGs under NFWP, technical assistance programs to WAGs, and coordination of livelihood pilots support for selected women beneficiaries of the project. However, with COVID-19, it is important that the firm ensures that training venues and procedures comply with the guidelines provided by the World Bank and the Nigeria Centre for Disease Control (NCDC). The SEP will include aspects on COVID-19 constraint and the necessary requirements. The activities under this project will involve the engagement of contracted workers. The main activities of these workers will include training the NFWP team and project beneficiaries, who are mainly women. Given the scale of project activities, there is a need to prepare Labour Management Procedure (LMP), which will assess the use of contractors in the delivery of training to the Project staff and beneficiaries. The firm will prepare a LMP that will detail the aspects of ESS2 that apply to contracted workers and will include a GRM specifically for project workers to raise any issues. The LMP will include terms and conditions of employment, non-discrimination and equal opportunity, the establishment of worker's organizations, and occupational health and safety (OHS) measures regarding COVID-19 which will detail requirements of social distancing, use of nose mask, hand washing and hand sanitizing. The LMP will set out grievance arrangements for project workers and Codes of Conduct (CoC) that also address SEA/SH risks. There is a need to ensure the safety and security of workers and project beneficiaries during the training due to the insecurity situation in Nigeria, especially in the participating states. The firm will rely



on the security information provided under the NFWP whilst organizing training. The firm will rely on the security information provided under the NFWP whilst organizing training. The NFWP currently developed a Security Risk Management plan which would be useful in supporting the activities of this intervention.

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:

ESS1 is relevant as it applies to all projects supported through Investment Project Financing. The activities supported by the firm does not involve any form of physical construction. Some risks include those associated with the potential spread of COVID-19 during any of the organized public engagements and training sessions with the Federal, State, LGA, Ward level facilitators and women beneficiaries. The activities of training, public dialogues, meetings with respective stakeholders, are required to be adequately assessed, managed, and monitored for risks of exposure and infection to the COVID-19. Public meetings and/or stakeholder gatherings although not in large numbers, pose the risk of infection and transmission. A guideline on conducting meetings under COVID-19 constraints will be included in the SEP. In consideration of this risk, an ESCP will be prepared by the Borrower with the support of the World Bank team and will include commitments to undertake the required assessments related to Occupational Health and Safety (OHS) risks in the context of COVID-19, as well as relevant capacity building activities.

The project will prepare a guideline on conducting meetings under COVID-19 constraints and will include in the SEP. Under this intervention, the firm would organize training, advisory services, livelihood support where staff and contractors of Plan International will provide these training to WAG, project beneficiaries and staff of the NFWP. The project must not induce the risk of SEA/SH risks. Plan International Nigeria will prepare an LMP that will detail the aspects of ESS2 that apply to contracted workers and will include a GRM specifically for project workers to raise any issues. The LMP will consist of terms and conditions of employment, non-discrimination and equal opportunity, the establishment of worker's organizations, and occupational health and safety (OHS) measures regarding COVID-19, which will detail requirements of social distancing, use of masks, hand washing and hand sanitizing. The LMP will set out grievance arrangements for project workers and Codes of Conduct (CoC) to address SEA/SH risks.

The relevant ESSs that apply to the Project are ESS1, ESS2, ESS4 and ESS10. To comply with the relevant standards, the firm will prepare and disclose an Environmental and Social Commitment Plan (ESCP), Labour Management Plan (LMP) and a SEP before the Decision Meeting.

Areas where "Use of Borrower Framework" is being considered:

The use of the borrower framework is not being considered.

ESS10 Stakeholder Engagement and Information Disclosure

ESS10 is relevant. Plan International Nigeria is preparing a Stakeholder Engagement Plan (SEP) consistent with the requirements of ESS10. The SEP will identify the relevant project stakeholders, such as the Nigeria for Women Project team at the National and State levels, Women Affinity Groups (WAG) facilitators, Ministry of Women Affairs



at the Federal and States, Commissioners of Women Affairs, as well women and men from the supported communities, Ministry of Health, and Consultants providing technical expertise. The document will meet ESS10 requirements and will be updated for future engagements during project implementation.

The SEP will: (i) describe the Project stakeholders and how they will be engaged throughout the project life, with a focus on identifying vulnerable individuals or groups and applying measures to remove barriers to their participation; and, (ii) describe the grievance redress mechanism (GRM), including GBV sensitive referral pathways. The existing GRM under the NFWP will be adopted by the firm. The SEP will also provide measures to ensure that all stakeholder engagement activities will be conducted in compliance with the National COVID-19 protocols on social distancing and the World Bank guidance note on “Public Consultations and Stakeholder Engagement in WB-supported operations”.

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

ESS2 is relevant. The activities under this project will involve the engagement of contracted workers and other staff of Plan International Nigeria. The main activities of these workers will include training of the NFWP team and project beneficiaries. Given the scale of project activities, Labour Management Procedure needs to be prepared, which will assess the use of consultants in the delivery of training to the Project staff and beneficiaries. The implementing firm will prepare a LMP that will detail the aspects of ESS2 that apply to use contracted workers and will include a GRM specifically for project workers to raise any issues. The LMP will include terms and conditions of employment, non-discrimination and equal opportunity, the establishment of worker’s organizations, and occupational health and safety (OHS) measures regarding COVID-19 which will detail requirements of social distancing, use of nose mask, hand washing and hand sanitizing. The LMP will set out grievance arrangements for project workers and Codes of Conduct (CoC) that also address SEA/SH risks.

ESS3 Resource Efficiency and Pollution Prevention and Management

N/A

ESS4 Community Health and Safety

ESS4 is considered relevant. The main potential risk to community health is exposure of members of the communities that would be trained to the COVID-19 pandemic whilst undertaking trainings. An Occupational Health and Safety (OHS) protocol will be put in place to address issues associated with potential spread of COVID-19 and ensuring application of reusable PPEs and proper final disposal of single use PPEs to prevent further transmission of the COVID-19 pandemic to the community. The OHS protocol will be established in the LMP.

The project does not involve any civil works and there will be negligible risks to community health and safety in terms of labor influx, and construction and traffic related safety.



However, there is a need to ensure the safety and security of both the workers and project beneficiaries during the training. The implementing firm will rely on the security information provided under the NFWP whilst organizing these trainings.

Other potential risks may relate to project induced SEA/SH issues perpetrated by contracted Trainers and staff of Plan. The LMP will also include measures to address the SEA/SH risks. Codes of Conducts for relevant project contractors and workers will be included in the LMP to address SEA/SH behaviour and the sanctions in case of infraction. The LMP will include provisions to reinforce preventive behaviour, specific issues on SEA/SH.

NfWP has already established mechanisms that will allow for the safe and ethical handling of SEA/SH allegations posed by the Project. NfWP is currently undertaking a GBV Mapping of Service Providers in the participating states. The exercise will provide a database of GBV Service Providers. The NfWP has in place a GRM that will be operationalized under this intervention.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

N/A

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

N/A

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

N/A

ESS8 Cultural Heritage

N/A

ESS9 Financial Intermediaries

N/A

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

N/A

OP 7.60 Projects in Disputed Areas

No

N/A

Public Disclosure



III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

N/A

B. Proposed Measures, Actions and Timing (Borrower's commitments)

Actions to be completed prior to Bank Board Approval:

1. Preparation and disclosure of an Environmental and Social Commitment Plan – Before Decision Meeting
2. Preparation of Stakeholder Engagement Plan including a GRM – Before Decision Meeting
3. Preparation, consultation and disclosure of a Labour Management Procedures

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

1. ESF Capacity building
2. Implementation of a Grievance Redress Mechanism
3. Consulting stakeholder engagement in light of COVID-19
4. Occupational Health and safety protocol at work including those related to COVID-19

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Plan International Nigeria

Implementing Agency(ies)

Implementing Agency: Plan International Nigeria

V. FOR MORE INFORMATION CONTACT



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VI. APPROVAL

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Practice Manager (ENR/Social)	Sanjay Srivastava Recommended on 16-Dec-2021 at 16:39:55 GMT-05:00