



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 01/10/2022 | Report No: ESRSC02512



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Nigeria	AFRICA WEST	P177941	
Project Name	M&E Support for NFWP		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Sustainability and Inclusion	Investment Project Financing		12/8/2021
Borrower(s)	Implementing Agency(ies)		
Diadem Consult	Diadem Consult		

Proposed Development Objective

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>2.48</b>

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

No

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

**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 the firm 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 activities under this project include providing environmental and social functions will be performed by Diadem Consults Ltd. Diadem Consults Ltd. is a global development organization and has over ten years of experience in implementing project monitoring and evaluation. The firm also has extensive experience in building the capacity of diverse stakeholders to sustainably monitor their programs beyond the program's life and build the capacity of data analysis. Diadem has worked in all states in Nigeria and is knowledgeable about diversity of culture and religion in each locality. Diadem has also supported other World Bank projects, including the National Social Safety Nets Project (NASSP – P151488), development partners such as the UNDP, the EU, and the Government of Nigeria, through the Federal Ministry of Women Affairs and the National Human Rights Commission.

Although Diadem Consult Ltd. has no capacity in managing environmental and social risk, the firm has appointed staff to prepare the required preliminary E&S document. The Bank E&S Specialist/s will support the above staff in the preparation of the Environmental and Social Commitment Plan (ESCP), Labor Management Plan (LMP) and Stakeholder Engagement Plan (SEP), including capacity building and training on the relevant ESF requirements as



specified in the ESCP. Diadem Consult Ltd. will be required to engage an E&S officer within the organization to implement the E&S requirements under the intervention. This will be included in the ESCP.

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

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

Low

#### 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. The project does not include activities that would have a physical footprint and / or environmental dimensions and implications. The activities supported are mainly to strengthen the NFWP M&E Strategy and Framework, and capacity building of project staff at the Federal, State, LGA, and Ward levels on M&E. The project will not invest in any actions to improve service delivery quality like communications services, landscaping, and building maintenance, or other physical infrastructure facilities that may cause, from its implementation, adverse impacts to environment and/or ecosystems. Implementation risks include Occupational Health and safety of project workers and beneficiaries because of the risk of spread of COVID-19 during meetings and training supported by the project due to poor air quality.

#### Social Risk Rating

Low

The social risk rating is classified as low given that the anticipated risks and impacts are minimal. Activities supported is limited to the revision of the NFWP M&E Strategy and Framework, capacity building of project staff at the Federal, State, LGA, and Ward levels on M&E and coordination with the impact evaluation management firm to ensure that monitoring data capture key impact-related measures as necessary. However, with the issue of COVID-19, the implementing firm must ensure 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 of COVID-19 constraints and the related requirements. There is also a need to address potential project-induced sexual exploitation and abuse/sexual harassment (SEA/SH) risks, grievances, and complaints during implementation. Given the scale of project activities, a simple Labour Management Procedures (LMP) need to be prepared, which will assess risks associated with delivering training to the Project staff and beneficiaries. The NfWP has in place a GRM that will be operationalized under this intervention. Diadem Consult will utilize the existing GRM system from NfWP.

### 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 project aims to provide technical assistance and capacity building to the National and State Project Coordinating Unit (SPCU) M&E Teams and will be expected to work closely with all project partners and stakeholders on M&E.



ESS1 is relevant as it applies to all projects supported through Investment Project Financing. The activities supported by the firm do not involve any form of physical construction. Some social risks include 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 training activities, public dialogues, and meetings with respective stakeholders must be adequately assessed, managed, and monitored for risks of exposure and infection to the COVID-19. Although not in large numbers, public meetings or stakeholder gatherings pose the risk of disease and transmission. Diadem Consult will include guidelines on conducting meetings under COVID-19 constraints in the SEP. In consideration of this risk, an ESCP will be prepared by Diadem Condukt 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.

Under this intervention, the firm would organize capacity building staff of the NfWP and other relevant stakeholders. Diadem Consult will prepare a simple LMP that will detail the aspects of ESS2 that apply to 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 intervention must not induce the risk of SEA/SH risks. 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 an Environmental and Social Commitment Plan (ESCP), 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**

Diadem Consult Ltd. is preparing a SEP consistent with the requirements of ESS10. The SEP will involve the relevant project stakeholders, such as the Nigeria for Women Project team at the National and State levels, Monitoring and Evaluation Officers at the Federal 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. The SEP 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**

The activities under this project will involve the capacity building provided to the NfWP staff at different levels (national, state, LGA and ward levels) and stakeholders. Given the scale of project activities, a simple Labour Management Procedures (LMP) will be prepared, which will assess the use of Diadem staff in delivering training to the Project staff and beneficiaries. The LMP that will detail the aspects of ESS2 that apply to the use of 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 nose mask, 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. In addition, current Occupational Health and Safety protocols of the PIU will be updated to protect its staff and consultants during this intervention.

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

None

### **ESS4 Community Health and Safety**

The main potential risk to community health is the exposure of members of the communities that would be trained to the COVID-19 pandemic while undertaking training. An Occupational Health and Safety (OHS) protocol will be put in place to address issues associated with the potential spread of COVID-19 and ensure the 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 ESCP and LMP.

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

There is also a need to ensure the safety and security of both the workers and project beneficiaries during the trainings and consultations. Diadem Consult will rely on the security information provided under the NFWP while organizing these training and consultations.

Other potential risks may relate to project induced SEA/SH issues perpetrated by the Training staff. 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.

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

None

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

None

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

None

**ESS8 Cultural Heritage**

None

**ESS9 Financial Intermediaries**

None

**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

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?**

No

**Financing Partners**

None

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

Public Disclosure



**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 of Labour Management Procedure

**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 at work including those related to COVID-19

**IV. CONTACT POINTS**

**World Bank**

Contact: Victoria Esquivel-Korsiak Title: Senior Social Development Specialist

Telephone No: 5359+88798 / 1-202-458-8798 Email: vesquivelkorsiak@worldbank.org

Contact: Michael Gboyega Ilesanmi Title: Senior Social Development Specialist

Telephone No: 5359+352 / 234-802-6713353 Email: milesanmi@worldbank.org

**Borrower/Client/Recipient**

Borrower: Diadem Consult

**Implementing Agency(ies)**

Implementing Agency: Diadem Consult

**V. FOR MORE INFORMATION CONTACT**

The World Bank  
1818 H Street, NW  
Washington, D.C. 20433  
Telephone: (202) 473-1000  
Web: <http://www.worldbank.org/projects>

**VI. APPROVAL**

Task Team Leader(s): Michael Gboyega Ilesanmi, Victoria Esquivel-Korsiak

Practice Manager (ENR/Social) Sanjay Srivastava Recommended on 16-Dec-2021 at 12:04:31 GMT-05:00