Project Information Document (PID)

Concept Stage | Date Prepared/Updated: 29-Aug-2019 | Report No: PIDC26940

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BASIC INFORMATION

A. Basic Project Data

Country Nigeria	Project ID P170664	Parent Project ID (if any)	Project Name Ten Million Adolescent Girls Project (P170664)
Region AFRICA	Estimated Appraisal Date Jan 20, 2020	Estimated Board Date May 18, 2020	Practice Area (Lead) Education
Financing Instrument Investment Project Financing	Borrower(s) Federal Ministry of Finance	Implementing Agency Minsitry of Education	

Proposed Development Objective(s)

To increase completion rate of quality secondary education and participation in market-relevant skills training among adolescent girls in participating states.

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	500.00
Total Financing	500.00
of which IBRD/IDA	500.00
Financing Gap	0.00

DETAILS

World Bank Group Financing

International Development Association (IDA)	500.00
IDA Credit	500.00

Environmental and Social Risk Classification

Substantial

Concept Review Decision

Track II-The review did authorize the preparation to continue

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Other Decision (as needed)

B. Introduction and Context

Country Context

- 1. Nigeria, as the most populous country in Africa and accounting for the largest economy on the continent, is often referred to as the 'Giant of Africa'. With gross national income (GNI) per capita of US\$1,960, Nigeria is classified as a lower-middle-income country (LMIC) (World Bank, 2018). The country's economy is currently predominantly dependent on the oil sector and has suffered frequent boom-and-bust cycles that are linked with fluctuation in the global oil price. Following the 2014 oil price shock, GDP growth decelerated from 6.3 percent in 2014 to negative 1.6 percent in 2016 and weakly recovered to reach 1.9 percent in 2018, driven more by non-oil industry and services. This level of growth still lower than the population growth rate, implying negative per capita GDP growth. More than 20 percent of the population is classified as middle class; however, there are large disparities across regions and states and poverty remains widespread. Twenty eight percent of the population in the southern parts of the country is classified as middle class compared to only 5 percent of the population in the north. In 2016, the proportion of the population living in poverty using the national poverty line was 39 percent (Nigeria-SCD, 2018).
- 2. **Nigeria continues to face several security challenges in many parts of the country.** Widespread conflict in the North East, the Middle Belt, and the Niger Delta has made it difficult for households to access basic services including education and health and has limited the economic opportunities they have. These conflicts and instabilities are shaped by complex and interrelated historical, economic, political, socio-cultural and environmental factors². Strengthening institutions, improving the delivery of social services including education, opening economic opportunities especially for youth, and promoting equity and inclusion will be important to break the cycle of violence and fragility.
- 3. Nigeria has one of the youngest and largest working-age populations in the world, with adolescents accounting for 23 percent of the total population, which is estimated at over 190 million. With total fertility rate (TFR) of 5.8, the adolescent population is expected to double by 2050 (UN World Population Prospectus, 2017). Nigeria could capitalize on its youthful population and experience accelerated growth by generating a demographic dividend.³⁴ There is an emerging literature that shows demographic dividend is in fact human capital dividend as increase in human capital, especially increase in girls' education, is a trigger for both demographic transition and economic growth (Lutz, et.al., 2019). For Nigeria, a targeted and sustained effort to build human capital, including by ensuring girls from disadvantaged groups enroll and stay in school, will be key to lowering its high fertility and child mortality rates catalyzing a demographic transition. The reduction in fertility rate will free up resources, allowing the country to increase its investment in the human capital of future generations—providing the basis for sustained economic development.
- 4. However, Nigeria has not prioritized investment in human capital⁵ and the limited investment is stretched thin due to the large young population of the country, resulting in poor education and health outcomes. In the Human Capital Index⁶, Nigeria's performance is poor even compared to many Sub-Sharan African countries and its peers among

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¹ The figure is based on the Atlas method (World Bank, 2019).

² Detailed discussion can be found in Herbert, S. & Husaini, S. (2018).

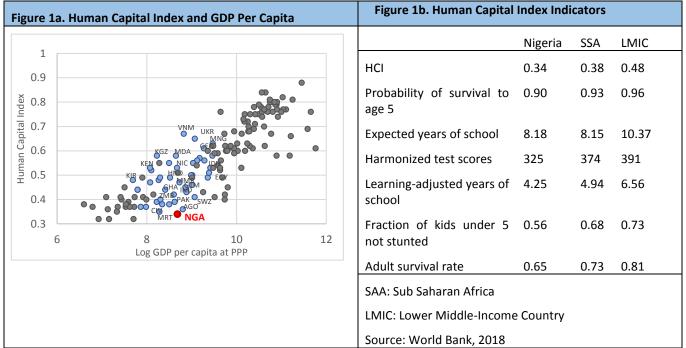
³ A demographic dividend is the economic benefit to a country that can take place when a country undergoes rapid declines in mortality and fertility, producing smaller and healthier families and a youth cohort that can be educated and empowered to enter the labor market. The change in the population age structure leads to a labor force that is temporarily growing faster than the population dependent on it. All else being equal, per capita income grows more rapidly during this time (UNFPA, 2018).

⁴ The demographic transition is a generalized description of the changing pattern of mortality, fertility and growth rates as societies move from one demographic regime to another.

⁵ For example, in 2013 total public spending on education (all sectors) was 1.7 percent of GDP, which is lower than the Sub-Saharan Africa average of 4.6 percent.

⁶ The Human Capital Index (HCI) measures the amount of human capital that a child born today can expect to accumulate by age 18, measuring her productivity compared to a benchmark of complete education and full health.

LMICs. The country's HCl is 0.34^7 and ranks low at 152 out of 157 countries (World Bank, 2018). Nigerian children lag in all six indicators measuring survival, schooling, and health scoring below regional and global averages. With respect to the education-related components of the HCl, Nigeria's performance is poor. For a child starting school at age 4 in Nigeria today, her expected years of schooling is 8.2 years and her learning-adjusted expected years of schooling is only 4.2 years (World Bank, 2018). This shows the urgent need for the Government of Nigeria to invest in education and health in a sustained and targeted way.



5. Improving human capital will require addressing pervasive gender inequalities, including in access to education and economic opportunities, as women account for half of the population (WDR, 2012). In global gender inequality rankings, Nigeria lags behind its peers and continues to rank at the bottom.⁸ Closing the gender gaps represents an enormous opportunity for Nigeria and could yield substantial economic and social benefits. Nigeria's real GDP per capita growth could, on average, be higher by 1½ percentage points annually if gender inequality was reduced to that of its peers in the region (IMF, 2018). In order to close the gender gap in Nigeria, adolescence is a critical window to intervene, as decision adolescent girls make or are made for them at this age (for example about their education, marriage, and fertility) have far-reaching and lasting impacts on their own, their children's and their families future wellbeing.

Sectoral and Institutional Context

6. Nigeria has made advances in improving the wellbeing of girls and women and towards achieving gender parity in education, health, and access to jobs and economic opportunities. However, these improvements have not occurred

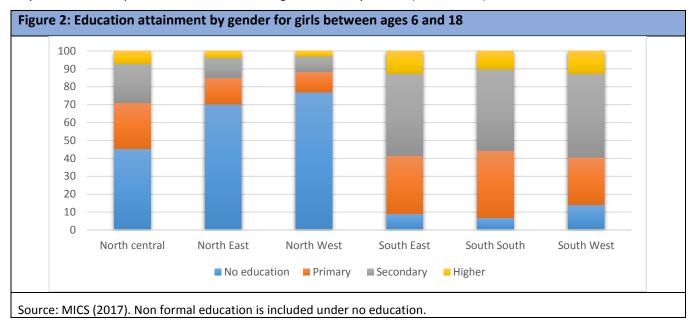
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⁷ This means that a child born in Nigeria today will be 34 percent as productive as an adult as she could be if she enjoyed complete education and full health.

⁸ For example, on the World Economic Forum's Gender Gap Index, Nigeria ranks 133 among 144 countries. The Gender Gap Index ranks countries according to calculated gender gap between women and men in four key areas: health, education, economy and politics to gauge the state of gender equality in a country (World Economic Forum, 2016).

evenly across different regions and socio-economic groups of the country. Progress has not reached all girls and women, with those from the northern parts of the country, rural areas, and poor households continuing to be disadvantaged.

A poor girl born in the North East or North West regions of Nigeria faces daunting challenges throughout her life. She starts her life with poor nutrition and poor health. She has 55 percent chance of being stunted in her early childhood and more than 1 in 10 chance of dying, mainly from preventable disease, before she reaches age 5 (DHS, 2018). If she survives to her school age years, she has on average less than 50 percent chance of enrolling in primary school and less than 30 percent chance of transiting to secondary school. If the girl comes from a rural community or from a poor household, she is doubly disadvantaged. For a girl from the poorest wealth quintile, for example, her chance of enrolling in primary and secondary school drop to 24 percent and 9 percent respectively. In sharp contrast, the average girl from the South South region, a region that has achieved gender parity in basic education, has 87 percent chance of enrolling in primary school and 79 percent chance of enrolling in secondary school (MICS, 2017).



8. In her adolescence years, she has 40 percent chance of getting married by age 15 and 35 percent chance of starting childbearing before age 17 (MICS, 2011). The high probability of entering into early marriage and childbearing, before she may be physically and emotionally ready, may have detrimental effects on the health and wellbeing of herself and her children. She has over 1 in 20 lifetime risk of dying from complications arising during pregnancy or childbirth. Her children face disproportionately high health risks. Data analysis findings show that, for mothers who are under 20 at time of birth, infant mortality rates are 95 deaths per 1000 live births compared to 72 deaths per 1000 live births for mothers who are between the ages of 20-39 (WHO, 2019; MICS, 2017; DHS, 2013). Her long-term economic and labor market prospects are poor. The likelihood of her being employed is lower than her male peers. In the North East or North West regions of the country, female employment rate is low at 46 percent and 57 percent respectively, compared to 82 percent and 72 percent respectively for men in the same regions (DHS, 2013). Most likely she will engage in low-productivity low-paying jobs and at every educational level, she will earn less than her male peers with the same level of education (IMF,

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⁹ Wodon, et.al., 2018, Karra and Lee, 2012 provide detailed discussion on the far-reaching consequences of early marriage and childbearing.

2018). This shows the grave economic realities girls in the northern parts of the country are faced with as they aim to transition into the labor market.

- 9. Addressing these gaps and disparities, by investing in the health and education of girls and by expanding their economic opportunities will be critical for the Nigerian Government to revitalize the economy and put the country on a path towards sustainable development (Nigeria SCD, 2018). Achieving sustained results in improving girls' education will be particularly important as it can be a powerful transformative force for the girls, their communities, and the economy as a whole. Girls' education, especially at secondary level, is a consistent factor that has been found to positively influence not only the girls' lives, but also improve numerous other development outcome, including reducing child and maternal mortality, improving educational outcomes of offspring, reducing poverty and achieving equitable growth (WDR, 2012). Each additional year of junior or senior secondary school is associated with 6 percentage points reduction in the probability of having a child before age 18 and 10 percent increase in income on average. Nigerian girls, especially in the northern parts of the country, face a wide range of demand-side, supply-side, and insecurity related constraints on their education.
- 10. The Government in collaboration with the World Bank conducted intensive stakeholders' consultation on adolescent girls' education and empowerment, to better understand these demand and supply-side constraints. The consultation was conducted in five northern states (Borno, Kaduna, Kano, Kebbi and Niger) involving traditional and religious leaders, adolescent girls (both in-school and out of school girls), parents, male youth, and teachers. Through the consultations, information on critical constraints girls' face and solutions from communities' perspective were gathered. Some of the key findings are highlighted below (see annex for additional details).

Demand-side constraints:

- 11. Families and communities live under cultural and social norm that promote gender discrimination and undervalue the benefits of educating and empowering girls. Under such social norms and misinformed religious practices, a woman's role in the family and community is primarily understood as a wife and mother and little value is placed on her education or her long-term economic independence. A female must be married and bear children in order to secure her future and define her place in the community she lives in. This norm and societal expectation put pressure on families, to marry off their girls as soon as they reach puberty.
- 12. Poverty is another important barrier families face in sending their girls to school. Families have to cover numerous costs associated with schooling including, cost of uniform and learning materials and ad hoc school fees (e.g. school cleaning and maintenance fees, registration fees, and exam fees). The financial burden on families is even higher at senior secondary level, where they are required to pay school fees, exam fees, and other additional costs. Very often, families find themselves with no money to cover these costs and they are forced to withdraw their girls from school early. Furthermore, for poor families, educating their girls means a trade-off between the girls providing indispensable labor inside and outside the home and going to school. For mothers from poor households in particular, sending their daughters to school means losing a key income earner, who is critical to meeting the basic needs of their families.
- 13. There are limited economic opportunities for educated youth, especially for educated girls. The uncertainty of the long-term return on education discourages families from investing in education. Particularly for girls, families view schooling as an unwise financial investment, owing to the lack of visible examples of educated women that have economically improved their status or are supporting their families. The high level of unemployment for educated boys and girls in not helpful. belief that any future income they will generate will be enjoyed only by their husbands' and their husbands' families. Within this context, families are often making difficult choices between meeting basic necessities and investing in their daughter's education, in the hope of a long-term return.

Supply-side constraints:

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- 14. Even when families are interested in educating their children, they often do not have access to schools, especially secondary schools. Children are forced to travel long distances to attend school and often families have to bear high costs of transportation. The long commute increases safety and security concerns, particularly for girls.
- 15. Children often do not learn much due to the very low quality of education and poor learning environment. Teachers are often absent from the school and their classroom teaching practice is not effective in helping students learn. They have poor attitude towards female students and lack professionalism. Existing schools are in dilapidated condition; they lack basic amenities such as toilets and drinking water sources; they are not well resourced; and overall, they do not provide conducive learning environment. In some areas, classrooms are overcrowded, as most schools do not have enough classrooms.¹⁰

Key Facts on Access and Quality Gaps

- Lack of access to secondary schools: Data analysis findings illustrate the severity of the secondary school access gap. In almost all regions, the number of JSSs is significantly lower than the number of primary schools. This is particularly true for the North West region, where the ratio of number of JSSs to the number of primary schools is less than 0.17, suggesting a sparse availability of secondary schools that can accommodate students transitioning from primary schools. The gap is more serious at senior secondary level. In Kano for example, there are 600 SSSs relative to 715 JSSs, and 8283 primary schools (EMIS Personnel Audit Data, 2018).
- **Poor quality of education:** Data on assessment of teaching and learning in Nigeria is scares, especially at the secondary level, making it difficult to fully examine gaps in the quality of education. At the primary level, findings from Service Delivery Indicator (SDI) survey show that 1 in 3 primary 4 students could not read letters and words and only 1 in 6 students could answer comprehension questions correctly. In numeracy, 1 in 2 primary 4 students could not add or subtract single digits. Only 1 in 5 students have mastered double-digit addition and subtraction and less than 1 in 20 are able to complete a double-digit multiplication. The results at the primary level are indicative of a system level issue in quality of education, at all levels.
- Findings from SDI suggest that quality problems stem from various factors including the following: many teachers lack the necessary competencies (both in terms of subject knowledge and pedagogical skills); teachers work in under-resourced schools that do not have adequate teaching and learning materials; and teacher pay is low and often late, reducing the incentives for teachers to perform and be accountable for student learning outcomes (SDI-Nigeria, 2013; Policy Note on Nigerian Teachers, 2019).

High level of insecurity:

16. Female students are targets of abductions in conflict affected communities, especially in some part of Kaduna and by the Boko Haram insurgents in Borno. Girls have been forced to suspend their education after their school was destroyed as a result of conflict or they had to permanently dropped out of school because of the imminent possibility of attacks. In addition, girls face harassment inside and outside the school. Most cases remain unreported as victims often fear being shamed and ostracized, there are limited safe reporting channels, and often perpetrators go unpunished.

The Government's Renewed Commitment

17. In response to these continued challenges and complex constraints, the Government has made strong commitments to invest in the human capital of Nigerian youth, with a strong focus on girls and on closing regional

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¹⁰ Overcrowded classrooms are particularly an issue in Borno state, where the Boko Haram insurgency has destroyed many schools.

disparities. Nigeria's Economic Recovery and Growth Program (ERGP), through its Investing in People pillar, has placed investment in its youth, including girls, as front and center to form the foundation of Nigeria's growth. ERGP emphasizes that to grow and develop the economy sustainably, it is imperative to invest in youth including by improving their access to good and affordable education. The Universal Basic Education Commission (UBEC)'s is continuing its effort to provide quality basic education to all including through the Universal Basic Education policy, which mandates the provision of 9 years of free basic education.

- 18. Accelerating the momentum, on December 14, 2018, the Vice President launched Nigeria's Human Capital Development Vision. The Vision includes a set of prioritized policy and programmatic actions and ambitious stretch targets, including girls' education, health and family planning targets. Subsequently, Nigeria officially joined the Human Capital Project in February 2019¹¹. Nigeria's Human Capital Development Vision and its Human Capital Project did not come about through a fragmented effort at the central level. Instead they are the results of a cumulative and growing push for change at every level of Government and echelon of society and by stakeholders from all walks of life, who have seen the need to improve human capital in Nigeria and particularly the need to uplift the adolescent girl and unleash her full potential.
- 19. While the strong Government commitment to invest in human capital is encouraging, translating it into tangible results will be a challenge for Nigeria. The Government has recognized that translating the Vision into well designed policies and effective implementation will require several enabling conditions:
 - i. Greater coordination and collaboration horizontally across sectors and vertically across federal, state and local government levels;
 - ii. Increased domestic resource mobilization including stable financial commitment from the Government;
 - iii. Strengthening accountability mechanism at different levels of implementation, by involving all relevant stakeholders; and
 - iv. Learning through studies and evaluations to regularly update policies and programs and to ensure that lessons learned and new and innovative solutions are incorporated to address everchanging challenges.
- 20. The renewed commitment of the Government and the push and momentum for change at all levels, provides a fertile ground for the World Bank to boost its support to Nigeria, while building on ongoing interventions in education, health, and social protection (see annex for summary of ongoing World Bank supported intervention in human capital development). Through a forward-looking engagement, the World Bank can help Nigeria materialize concrete results out of the long-term agenda on human capital development.

Relationship to CPF

21. The proposed Nigeria Adolescent Girls Investment Project is well aligned with the World Bank Group's 2014 Nigeria Country Partnership Strategy for FY2014–2017, as well as its adjustment under the 2016 Performance and Learning Review. The CPS puts forward a program with three strategic clusters: (a) promoting diversified growth and job creation by reforming the power sector, enhancing agricultural productivity, and increasing access to finance; (b) improving the quality and efficiency of social service delivery at the state level to promote social inclusion; and (c) strengthening governance and public sector management, with gender equity and conflict sensitivity as essential elements of governance. The PLR confirmed that the CPS objectives remain aligned with Nigeria's development goals and introduced a fourth cluster to respond to the country's macroeconomic priorities: restoring macroeconomic resilience. The proposed

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¹¹ The Human Capital Project is a global effort to accelerate more and better investments in people for greater equity and economic growth.

project will, directly support the second CPS cluster on improving the quality and efficiency of social service delivery as well as support the third cluster on strengthening governance and public sector management.

- 22. The proposed project is in line with the 2018 Systematic Country Diagnostics (SCD) for Nigeria as it addresses a key constraint that has been identified as priority —the low human capital indicators in health and education, particularly in northern Nigeria and rural areas. Among the four pathways identified by the 2018 SCD as intermediate goals that are critical to help Nigeria become a middle-class society, the second one is to 'bridge the North-South divide' in health and education. To achieve this goal, the SCD identifies increasing female primary and secondary enrollment rates, especially in lagging areas as a key measure. Therefore, the proposed project objective of improving girls access to and completion of quality secondary education and girls' completion of comprehensive life-skills (including reproductive health and nutrition topics) and livelihood skills training as well as its focus on lagging behind states contributes towards with the second pathway of the SCD. Through channels discussed earlier, increased educational attainment for girls is also expected to have significant positive impacts on a host of health outcomes for themselves and their offspring in the long run.
- 23. The proposed project is also aligned with the World Bank Group Strategy for Africa, 2019, which identities strengthening human capital as an important strategy. The key policy actions identified as critical to building human capital in Sub-Sharan Africa include increasing female education, reducing child marriage, promote gender equity and female employment and access to job opportunities. The proposed project is very much in line with the overall strategy and directly with many of the policy actions. The project is also aligned with the Human Capital Business Plan for Africa, 2019, which identifies 'a focus on women's empowerment' as a strategic pillar.
- II. Multiphase Programmatic Approach
- A. Higher level objectives
 - 24. The higher order objective of the program is to improve human capital by investing in adolescent girls'.
- D. Rationale for Bank Engagement and Choice of using MPA
- 25. The significant disparities across regions and states of the country's key education, health, poverty and demographics indicators shows that the Government's investment in human capital has not been sufficient to meet the need, especially in the Northern parts of the country. Improving many of these indicators and building human capital will require implementing carefully tailored interventions that are multi-sectoral. The extensive global and regional experience acquired by the World Bank in supporting governments to empower girls, improve their educational attainment, and equip them with a broad set of skills is vital. The Bank has technical expertise across all relevant sectors and is well placed to support the Government in implementing a multisectoral program.
- The project will employ a traditional Investment Project Financing (IPF) approach using MPA financing modality. The main implementers of the project are states, many of which have limited capacity in key areas of project operations including technical, procurement, and financial management areas. Some of the states are affected by ongoing conflict and face substantial political and governance risks. Given the complexity of the project and the aforementioned risks, the traditional IPF approach is deemed appropriate, as it allows the application of World Bank guidelines and procedures for disbursement, procurement, FM, and safeguards.

C. Proposed Development Objective(s)

To improve completion of quality secondary education and comprehensive life-skills training for adolescent girls.

Key Results (From PCN)

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- Percentage of girls transitioning to Junior or senior secondary school
- Percentage of girls completing junior or senior secondary schools
- Number of girls who complete market-driven skills training
- State strategy and plan for convergent action on the empowerment of adolescent girls developed and adopted

D. Concept Description

27. The proposed project aims to achieve the PDO by addressing the critical binding constraints adolescent girls face as described in the sectoral context. The project will use a comprehensive approach to address these constrains by using the school, family and community platforms to empower adolescent girls. The approach will consist of interventions aimed at keeping girls in school and provide opportunities for them to, acquire critical life skills and market relevant skills not currently offered in schools. Within this framework, the project is structured around four components:

Component 1: School level Interventions (Estimated cost: \$230 million)

- 28. Component 1 aims to improve completion of quality secondary education for adolescent girls by addressing critical demand and supply constraints and equip them with life-skills and market-relevant skills.
- 29. **Sub-component 1a. Improve access to quality education:** The component will address access gaps by constructing new schools and renovating or expanding existing schools through Ministry of education. To improve quality, the component will provide continuous professional development for teachers through colleges of education.
- 30. **Sub-component 1b. Market-relevant skills and life-skills training**: This component aims to empower and prepare adolescent girls to successfully navigate the different stages of life by equipping them with life skills (negotiation skills, conflict resolution, self-esteem leadership skills, financial literacy and adolescent health and nutrition) etc. It will also provide market-relevant skills training and a graduation grant upon senior secondary school completion. It will be implemented through collaborations with NGOs and private sector.

Component 2: Family support interventions (Estimated cost: US \$100 million)

31. This component aims to provide financial support package to families to incentivize girls transition to and attendance of secondary school. This will be implemented by state ministries of education in partnership with private sector.

Component 3: Community level interventions (Estimated cost: US\$100 million)

- 32. **Sub-component 3a. Addressing social norms:** This component will support behavior and social norms change on the value of girls' education and empowerment through media and by engaging traditional and religious leaders to serve as advocates. Traditional and religious leaders will be engaged via the Network of Traditional and Religious Leaders on Keeping Girls in School (KGIS Network). The component will support the formation of Mothers association and boys' clubs to support and monitor school attendance of teachers and students and feed into the School Based Management Committee (SBMC) accountability framework.
- 33. **Sub-component 3b. School Improvement Grants:** School grants will be provided to School Based Management Committees to improve learning environment as well as address the school's needs identified by the school community including mothers' club. This will be provided through the Ministry of Education.

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Component 4: System strengthening and learning agenda (Estimated cost: US\$70 million)

- 34. **Sub-component 3a. System strengthening:** This component aims to provide technical support to Federal and state governments in institutional strengthening, policy review and improve their capacity at the federal, state and local government levels Support will be provided to ensure effective project implementation and coordination, monitoring and evaluation and efficiency in service delivery.
- 35. **Sub-component 4b. Learning agenda and Impact evaluations**: Impact evaluations, studies, pilot programs will be supported to facilitate learning that will enable scale up to other phases of the MPA. Learning will be facilitated from multi-dimensional approaches and allow lessons to be more easily applied to other operations.

Legal Operational Policies	Triggered?	
Projects on International Waterways OP 7.50	No	
Projects in Disputed Areas OP 7.60	No	
Summary of Screening of Environmental and Social Risks and Impacts		

The project will support civil works (construction of schools and classrooms) disperse nationwide which locations are not known at this stage. Potential risk from the project activities might include: road accidents, electrocution, falling from heights, being struck by falling objects or moving machinery, construction related fractures, lacerations or more serious injuries. Also, the project will support civil works in some remote areas where wildlife and protected areas are present. Potential impacts associated with these activities might include cutting of trees or natural vegetation as source of materials for the schools. Also, construction pits and ditches can affect local fauna by trapping and may lead to soil erosion. Since the project will be implemented nationwide in multiple school sites, there is potential for a wide range of impacts to occur, which the borrower has limited capacity to manage. Supervision of the project will also represent a challenge for the Project Management Unit (PMU) due to the need to monitor a range of impacts of geographically dispersed projects with a range of challenges including security related, Gender Based Violence (GBV) and/or Sexual Exploitation and Abuse (SEA) risks, potential for social conflicts given the promotion of social norms that may not be appreciated by some communities or groups all of which there is limited local capacity to systematically mitigate. To proactively identify and prevent potential environmental and social risks and impacts, the project will prepare and disclose ESMF and RPF before appraisal to mitigate social risks and impacts. Similarly, the project will be assessed for potential GBV risks using the GBV/SEA risk assessment tool. Appropriate mitigation plans will be incorporated into project design

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Borrower/Client/Recipient

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APPROVAL

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