



Additional Financing Appraisal Environmental and  
Social Review Summary  
Appraisal Stage  
**(AF ESRS Appraisal Stage)**

Date Prepared/Updated: 06/27/2023 | Report No: ESRSAFA581



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Borrower(s)	Implementing Agency(ies)
Nigeria	WESTERN AND CENTRAL AFRICA	Federal Republic of Nigeria	Federal Ministry of Education
Project ID	Project Name		
P179281	Additional Financing for Adolescent Girls Initiative for Learning and Empowerment		
Parent Project ID (if any)	Parent Project Name		
P170664	Adolescent Girls Initiative for Learning and Empowerment		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	6/12/2023	9/14/2023

Proposed Development Objective

To improve secondary education opportunities among girls in targeted areas in participating states.

Financing (in USD Million)	Amount
Current Financing	500.00
Proposed Additional Financing	700.00
<b>Total Proposed Financing</b>	<b>1200.00</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]**

To empower adolescent girls through secondary education and market relevant skills training

**D. Environmental and Social Overview**



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

The Additional Financing (AF) Project will be implemented in North East (Adamawa, Bauchi, Gombe, Jigawa and Yobe), North West (Sokoto and Zamfara) and North Central (Kogi, Nasarawa, Niger, and Kwara) geopolitical zones, which are areas of fragility due to the conflicts, endemic poverty, and high increase of climate change vulnerability. Climate Change issues have been exacerbated more than ever before in the country, with the issue of flooding now becoming a challenge in the country's northern region with increasing variability in weather conditions. The North East (Adamawa), North Central (Kogi), and Northwest (Sokoto) also experience flooding annually which impacts on public structures including schools. Schools are submerged during heavy downpours causing damage and displacement of students, and the capacity to evacuate during flooding disasters is inadequate. Consultation with the Sokoto State Ministry of Education indicated that 10 schools in the Sokoto metropolis experience flooding annually, which keeps students out of school whenever it occurs.

Another issue in the education sector in Nigeria is the number of out-of-school children. The United Nations Education, Scientific and Cultural Organization (UNESCO) reported about 20 million out-of-school children in Nigeria, making her the second highest in the world before India and after Pakistan. These issues have been exacerbated by insecurity, poverty, gender and sociocultural norms and practices, which deter females from attending formal education.

Sanitation and waste management in most schools in the participating states require adequate institutional capacity, funding, equipment, enforcement, and political will on the part of the government for proper management. The lack of sufficient and adequate toilet facilities threatens the eradication of open defecation (OD). OD is a serious environmental health hazard affecting countries in Sub-Saharan Africa, including Nigeria. In Nigeria, the open defecation-free (ODF) program has long been adopted, but there is still much to be done as only 27/774 (3.49%) local governments in Nigeria have been declared ODF. The Government is committed to eliminating open defecation and ensuring that Sustainable Development Goal (SDG) 6 is achieved, especially in rural areas, via Executive Order 009, 'The Open Defecation-Free Nigeria by 2025 and Other Related Matters Order'.

More than 94% of households still rely on wood as a primary energy source in these project locations. The school boarding houses use fuelwood for cooking. Thus, there is need for the Project to promote the use of improved stoves/kilns to reduce fuelwood demand, improve health and reduce greenhouse gas emissions. Environmental awareness and capacity to manage environmental risk in these states would require dedicated efforts to facilitate commitments to climate actions.

With the majority of the states experiencing fragility, conflict, and violence, security becomes a major concern especially at it concerns with implementation of sub-project activities and supervision by the Project actors. The Parent AGILE Project is currently addressing these issues highlighted above through the various project activities. Component 1 activities involves building new classrooms and renovating existing ones to ensure there are more than enough classrooms in schools. Component 1.2 activities involve providing WASH facilities, provision of perimeter fences in schools. Primary schools are extended to include Junior Secondary Schools (JSS), and JSSs are extended to Senior Secondary Schools (SSSs). The issues associated with social norms, are quite critical to ensure that these schools are attended are ongoing using high-level influential people, religious and traditional rulers to advocate for educating girls and boys. The Conditional Cash transfer addresses the poverty issues through payment of monthly grants to very poor householders to allow their girls to attend schools.



The proposed AF will ensure the continuity of the ongoing operation to additional states and will extend the coverage of beneficiaries to include out-of-school adolescent girls, out-of-school married girls and girls with disabilities. Additionally, the AF Project will implement a livelihood skill programme to build the girls' skills which can be transmitted to job creation and self-reliance opportunities for them.

**D. 2. Borrower's Institutional Capacity**

The implementing agencies are the State Ministries of Education, with support from other State Ministries, departments and agencies (MDAs) such as the Ministry of Women Affairs, Ministry of Health and the Cash Transfer Office from the Ministry of Finance.

The Federal Ministry of Education is the coordinating Ministry for the Project and would be supported at the Federal level by the Ministry of Finance and Budget and National Planning, Ministry of Woman Affairs and the Ministry of Health, among other Ministries.

The capacity at the Federal level Environment and Social (E&S) Unit has been enhanced with two Technical Assistants (TAs), providing support in Environment, and Social/Gender Based Violence (GBV), respectively. The Federal team and the Parent Project State Project Implementation Units (SPIUs) have participated in several Environmental and Social Framework (ESF) training organized by the World Bank E&S Specialists and the in-country ESF training organized with the support of Operation Policy Country Services (OPCS). Such trainings include the ESF, Grievance Redress Mechanism (GRM), Addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) risks in Education Project, Occupational Health and Safety Training, Stakeholder engagement processes, and Safety & Security Training (facilitated by the World Bank Security Specialist). Additionally, bi-monthly check-ins are organized by the Bank Specialist to ensure adequate implementation of SEA/SH preventive and response measures as agreed in the Project documents.

The overall Environmental and Social E&S performance of the Parent Project is assessed as being Moderately Satisfactory. Challenges experienced during implementation include delays in engaging Environmental and Social Management Plan (ESMP) firms, E&S and GBV TAs at the state level. These issues have been documented as lessons learnt, which will be forestalled by early engagements of key personnel in the AF. It is worth noting that some of the proposed new states have limited experience in implementing World Bank-funded Projects. To address this risk, each state must engage one (1) TA that will provide Environmental support and one (1) TA on Social and GBV to hand hold the state officers. The engagements should be done one month after the AF Project Effectiveness, maintained in the first year of implementation and renewed if required throughout Project implementation. Other lessons from the Parent Project indicated that most Environmental and Social Officers (including Gender/GBV Officers) are still attached to their Core Ministry, which is considered their primary assignment. Under the AF, there is a need for full deployments for any staff providing E&S support. Office spaces and working tools such as laptops/computers will be provided to all E&S Officers. The World Bank will expose all Officers to additional ESF training, including those offered by the Sustainable Procurement, Environmental and Social Standards Enhancement Project (SPESSE) (P169405).

The Parent Project has developed several documents to guide its Project implementation, such as the Project Implementation Manual, GRM Manual, and a GBV Assessment for the AGILE Project. GRM is operational and remains accessible and effective in receiving complaints and feedback on the Project. GRM Committees have been constituted at each school, with GBV focal points identified as Guidance Counsellors from each school. The GRM Manual developed by the Parent Project will be utilized for the AF.



A SEA/SH Action Plan and an Accountability Response Framework have been developed by the Federal Team for the Additional Financing states, which indicate the protocol for responding to SEA/SH issues under the Project and an action plan for mitigating SEA/SH Risks. All the participating states will adopt the document for their state specific SEA/SH Action Plan.

Due to the number of sites covered by the Project and the in-country security issues, it has been difficult for the Bank and the client to monitor schools' compliance with E&S activities adequately. The Project engaged the use of Third-Party Monitors (TPMs) for monitoring. The TPMs, in addition to their work, provide update on E&S compliance and have within their team a focal person on E&S. This will continue to apply for the AF states.

The School Based Management Committees (SBMCs) supports decision-making in the schools. They are funded by the Project to implement rehabilitation activities as a Community Driven Development (CDD) approach and also due to hard-to-reach areas in the states. Under the Parent Project, some capacity-building sessions were conducted with the SBMCs and their workers in several states on essential occupational health and safety practices and signing on the Code of Conducts (CoC) that stipulates zero tolerance on SEA/SH risk. Although it is difficult to measure the level at which these activities are being implemented, under the AF, the SPIUs will enforce mandatory training for the SBMCs and their workers and ensure that E&S good practices are included in the School Improvement Plans, which are plans that are developed for the implementation works. Monies will be allocated for PPEs, and each worker will be made to sign a CoC before engagement by the SBMC.

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

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

Substantial

#### Environmental Risk Rating

Substantial

The AF Project is now upgraded from Moderate to Substantial for Environment risk, although the nature of the works may remain of Moderate risk, the scale up to additional states significantly increases the geographical coverage and footprint of the project. The project will be implemented in 11 northern states and 110 Unity Schools across the country. This implementation runs simultaneously with the Parent Project which has seven participating states which brings the overall number of states to 18. The population and area of influence of the project is considered large with a (50%) national coverage. The project will support civil works (expansion of junior and senior secondary education through the construction of schools and classrooms) which could generate waste management issues primarily as a result of excavated soil and construction debris (paint containers, cement bags, diesel/oil containers, batteries, etc.) in the communities. There could be possibilities of air, dust, and noise pollution especially during the rehabilitation and construction activities. Furthermore, project activities could impact on water use, including possibility of Carbon dioxide (CO2) emission due to energy use. Other relevant impact include surface/groundwater pollution, where waste materials including construction debris migrate to the water sources. Challenges in project implementation could include non-compliance with occupational health and safety (OHS) rules, poor handling and disposal of construction waste from proposed infrastructure works (rehabilitation of existing classrooms and facilities such as laboratories; and construction of additional classrooms, hygiene and sanitation facilities, fence etc.), could result in air, water and land pollution. Hazardous waste may be generated from the disposal of old laboratory equipment and unused chemicals during rehabilitation phase. While the specific sites are yet to be known, the E&S instruments have been



prepared to identify and mitigate potential E&S risks and impacts. The project has updated the Environmental and Social Management Framework (ESMF), inclusive of security risk assessment and Labour Management Plan (as an annex in the ESMF). The ESCP has included institutional strengthening, climate actions, security action plans as key components.

**Social Risk Rating**

Substantial

Similar to the Parent Project, the activities under the AF are expected to have substantial social risks and impacts. While the overall social benefits are primarily beneficial, key social risks relevant include (i) security risks for beneficiaries, project workers operating in an increasingly insecure environment which may be further exacerbated as a result of the project activities, (ii) potential forms of GBV including SEA, SH which may prevail due to the labour influx, and Intimate Partner Violence (IPV) such as domestic violence perpetrated by male to female caregivers receiving the conditional cash transfer for their adolescent girls, (iii) School Related SEA/SH perpetrated by teachers and support staff to students, (iv) grievance and complaints, (v) social exclusion of vulnerable girls if the Project does not provide accessible environment and teaching methods that support them, (vi) labor and working conditions of Project workers, as defined under ESS2, including the risk of exposure to COVID-19 and transmission of the diseases during the implementation of Project activities, if such risks are not managed through adequate mitigation measures, (vii) elite capture, (viii) issues of corruption over the Cash transfers component of the Project and other interventions, (ix) potential issues on land use and community land donations, (x) issues with capacity of SPIUs that may delay implementation of mitigation measures for the identified social risks. Mitigation measures have been set out in the Project’s ESMF, which has been updated to include Labor Management Procedures (including a worker specific GRM) and a Security Risk Assessment. The existing Stakeholder Engagement Plan has been updated to guide the interactions with Project beneficiaries (including the most vulnerable among them) and ensure that a Project Grievance Redress Mechanism (GRM) is in place for addressing concerns and grievances during the Project implementation.

Public Disclosure

**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 AF Project will have overall positive environmental and social impacts, as it will improve secondary education opportunities among girls in targeted areas in participating states. The AF Project will also expand the target group to include girls that are in and out of school, especially adolescent married girls, and girls with disabilities.

The main potential environmental risks/impacts, similar to the Parent Project include issues on waste management associated with the civil works including rehabilitation works, excavated soil and construction debris. The waste generated by the construction works will largely be disposed of at government approved disposal sites according to the national/state laws and regulations. In addition, rehabilitated schools would be screened for the presence of asbestos in roofing or insulation. If found, proper waste management and disposal will be followed per international good practices. During the project operational phase, sewage/human waste will be generated from school WASH facilities and these will to be duly evacuated to avoid environmental pollution. Wastes such as menstrual pads would



also have to be managed properly because of its potential to clog the toilets. Furthermore, project activities could impact on water use, and Carbon dioxide (CO<sub>2</sub>) emission due to energy use.

To address the environmental issues, the Government has updated the ESMF to include waste management strategies and procedures for preparing the ESMPs. Accordingly, site-specific ESMPs will be prepared by the SPIUs during project implementation to include methods to avoid, reduce, mitigate and compensate or offset these impacts. The Government has prepared an Environmental and Social Commitment Plan (ESCP) which will form part of the legal agreement and will be adapted due to significant changes to the risks and impacts ratings as the project proceeds. The ESMF and ESCP will be disclosed to stakeholders before the end of the Appraisal.

Potential social risks include insecurity in the proposed states (exacerbated due to the project activities), SEA/SH risks primarily linked to labour in-flux, School Related GBV (perpetuated by teachers and non-teaching staff), school-based violence (e.g., bullying, corporal punishment, humiliation, sexual harassment, etc.), grievances/complaints, risks of elite capture, marginalization and exclusion of specific communities from project activities. Potential forms of GBV, including IPV risks such as domestic violence, may arise or be exacerbated between parents/guardians due to conflicts over financial incentives or whether their daughters should access education. Other social risks may include further isolation or violence targeting schoolgirls or those favouring girls accessing education.

Insecurity is a critical challenge in the proposed participating states and the entire country. The kidnapping of school children has been on the rise, mainly in North West states of the country. In particular, mothers of girls in Zamfara state have withdrawn most girls from boarding facilities. The Government of Zamfara has yet to declare a state of emergency in the state's education sector. Under Parent Project 2 ESRITs were triggered involving the kidnapping and an attack of a project staff while on personal travel. These recurring incidents under the Parent Project necessitated additional layers of Security requirements for the Parent Project and the AF. The updated ESMF includes a Security Risk Assessment (SRA), which recommends and identifies the need for each state to establish Security Management Plan (SMP). The SMP will be developed within three months of Project Effectiveness.

Under the Parent Project, a case of SEA/SH was reported in a school supported by the Parent Project, which was addressed using the GBV Response Protocol established in the school by the Project. Project GBV Officers and their counterparts at the school level escalate SEA/SH cases to already identified GBV Service Providers through the established GRM structures. The AF states will continue to address potential SEA/SH issues and other cases of violence against children using the GRM Referral Protocol within the project design and ensuring that teachers and non-teaching staff sign CoC or behavioural standards.

Considering the proximity of the contractors, SBMC and their workers to the female students in schools, it is critical to put in place measures to protect school children, young people and teachers from potential SEA/SH. The Project will encourage the use of local skilled workers and enforcement of the signing of the CoC for all workers under the Project. In addition, the Project will ensure that students are protected from school-based violence that may disincentivize attendance or affect their ability to complete school.

The AF Project will utilize Behavioural campaigns to change social norms under Sub-component 2.1 to address social norms about girls' access to and completion of education. The AF Project will mitigate other potential risks, such as



elite capture and IPV's (due to the CCT), through stakeholder engagements using community actors, SMBCs, traditional and religious leaders, High-level Women Groups, mentors and influencers.

As there have been no material changes in the Project design, these risks will be managed using the existing risk mitigation instruments. The Stakeholders Engagement Plan (SEP) has been updated to reflect the additional consultations and information dissemination regarding the expanded scope under this AF. The ESCP is similarly updated to detail Clients' obligations and commitment to implement material measures for managing environmental and social risks and impacts. The GRMs have been valuable in addressing concerns of marginalized and excluded persons and communities from benefiting from the Project support. This will continue to apply, including community engagement to advocate for inclusion. The Project is also deliberately targeting vulnerable groups, which was one of the lessons learnt from the Parent Project.

Components 2.1 and 2.2 will help ensure that beneficiaries are engaged in climate change and disability inclusion to reduce the stigmatization of Persons with Disabilities. Furthermore, it will be critical to manage safe and robust discussions with those that may be initially unsupportive of the proposed social norms without isolating them from their families or communities.

The Parent Project continues to perform Moderately Satisfactory on E&S and has fully deployed E&S Officers at each SPIU. Each participating state under the AF will deploy an Environmental Officer from the State Ministry of Environment and a Social and GBV Officer from the State Ministry of Women Affairs as a condition for participation in the AF Project. Within one month of Project Effectiveness, each SPIU must engage an experienced Technical Assistance on Environment and Social/GBV to support the capacity of the states for a year. A training programme will be built into Component 3 to ensure that the capacity of the officers is enhanced for project implementation. The plan will include a specialized programme implemented by the SPESSE Project to support E&S officers.

### **ESS10 Stakeholder Engagement and Information Disclosure**

The updated SEP details:

- Stakeholder identification and analysis
- Planning for stakeholder engagement
- Consultations and disclosures
- Communication and sensitization campaigns
- Participatory citizen engagements
- Grievance redressal systems

Stakeholders consulted for the AF are the Federal Ministry of Education, Federal Ministry of Women Affairs, Federal Ministry of Environment, State Ministries of Environment, Women Affairs and Health and State Universal Basic Education Boards (SUBEB) (in Lagos, Nasarawa, Kogi, Kwara, Sokoto, Adamawa), School Based Management Boards in some selected communities, the Ministry of Women Affairs, the Ministry of Education, the Ministry of Health, civil society organizations (CSOs) and non-government organizations (NGOs) in Education, Health, Life skills and Disability space. Consultations were expanded to students with disabilities and their teachers, the Joint National Association of Persons with Disabilities, Disability partners: Plan International, Ike Foundation on Autism, Joint National Association of Persons with Disabilities, SightSavers, Save the Children International, Disability Rights & Inclusive Development





Consultants to understand the gaps and barriers to their education in inclusive schools. Details of these consultations have supported the design of the AF, especially in the area of increasing outcomes for girls and boys with disabilities. Other groups consulted include adolescent girls, teachers, school principals, parents, female caregivers, beneficiary households, and male community members.

The project-level GRM is fully operational for the Parent Project. The AF states will also adopt similar approach for GRM implementation, whereby GRM Committees will be formed at school levels with members such as parent-teachers association (PTA) Chairman, SBMC Chairman, School Guidance Counselors (who will serve as GBV Focal Point), and a trusted woman and youth member in communities where the school is located. Details of the GRM Process are indicated in the GRM Manual developed by the Parent Project. So far, under the Parent Project, 211 grievances (as at April 2023) have been received, mainly related to inquiries about the Project, administrative processing for the CCT components, fraud, and corruption, a SEA incident and an SH incident perpetrated by non-teaching staff and a issue of kidnap and attack on a Project staff while on personal travel. Each participating state shall operationalize a GBV-GRM with referral pathways established for SEA/SH cases and preparing SMPs for the security issues.

The Behavioral Norms components and the actions under the SEP will continue to be used to address issues on advocacy and campaigns to improve girls' education, especially out-of-school girls due to marriage, pregnancy, and girls with disabilities (including boys). Targeted persons such as highly influential persons, Traditional, Religious, SBMC and PTA members and school Principals will be used to propagate messaging on supporting adolescent girl education without excluding any groups.

The Project will need to innovate to achieve effective and meaningful consultations within the limitations occasioned by COVID-19. Strategies employed include smaller meetings and small focus group discussions (FGDs), taking full precautions on staff and beneficiary safety.

## **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 Labor and Working Conditions Project applies to direct project workers, contracted workers, community workers and primary supply workers. The Project will follow the ESS2 requirements to ensure the management of labour-related issues including issues of Occupational Health and Safety (OHS). The LMP is updated and included as an annex in the ESMF. The LMP provides that both the PIUs and the contracted primary suppliers observe safety and health at work and promote fair treatment, non-discrimination and equal opportunity for project workers, including vulnerable workers such as women, persons with disabilities, the elderly and youth as appropriate. It also lays down provisions for preventing all forms of forced labor and child labor and providing project workers with accessible means to raise workplace concerns.

Occupational hazards likely to occur during implementation of civil works include road traffic accidents, electrocution, falling from heights, being struck by falling objects or moving machinery, and construction related fractures, lacerations or more serious injuries. The project might include community workers as part of the effort to



maximize local benefits. In such cases, the project must ensure that Personal Protective Equipment (PPE) is distributed and used. In case of accidents, these community workers should receive the same care as other project workers. In the implementation of the project, the government will include project OHS measures that address: i) potential hazards for workers (materials, activities, substances); ii) protective and prevention measures, iii) provision of training, and iv) first aid, and v) hygiene facilities. The arrangements to respond to the requirements of ESS2 have been described in the LMP, which considered information on the national requirements, the Environmental Health and Safety Guidelines on Occupational Health and Safety and Good International Industry Practice (GIIP). Contractor firms implementing new school constructions and Implementing partners under Component 2.2 shall establish GRM responsive to the Environmental and Social Standard (ESS 2) requirement on Labor and Working conditions.

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

Risks related to the application of the ESS3 include Government consideration of cost savings which can result in the use of low-priced materials without considering resource efficiency, or the safety and well-being of users. Other factors include:

**Water use:** Access to water is a very important success factor for the project. Water is needed for the construction of the works and implementation of the WASH supported activities in the schools. However, in some areas, water is scarce and its uses, collection, storage, access and management and potential pollution as part of project design will need to be addressed during construction and operation. The ESMF assessed the potential cumulative impacts of water use upon communities and the environment and identifies mitigation measures proportionate to the risks and impacts. The water boreholes, where required, would be dug at safe distances from toilets to avoid contamination of ground water. The site specific ESMPs to be prepared by the SPIUs will include mitigation measures to minimize and manage proposed measure to address water use. Nonetheless, it is not expected that the project will be a significant user of water.

**Energy use:** The project is providing borehole facilities in schools to meet the water needs of the school communities. The use of generator to power borehole water pumps in schools can cause harmful gaseous emissions. Hence the installation of solar panel as alternative sources of energy is a vital component of this project. This help reduce emissions and promotes clean air in the project environment. Rehabilitation and construction will come with provision of lightings and other fittings. This project promotes the use of energy saving bulbs thus, supporting alternative technologies and practices that incorporate technical and financial feasibility. Schools will be also encouraged to engage in sustainable fuel consumption.

**Waste management:** Construction activities will generate solid waste which will primarily include excavated soil and construction debris. The waste generated by the construction works will largely be disposed of at government approved disposal sites according to the national laws and regulations. During construction, the contractors will be required to protect the soil and nearby streams from use for cleaning machinery and disposing hazardous construction wastes or residues. The government will need to define construction disposal sites according to acceptable parameters of ESS3 and to ensure that contractors do not leave hazardous wastes in the villages (paint containers, cement bags, diesel/oil containers, batteries, etc.). Furthermore, rehabilitated schools would be screened



for the presence of asbestos in roofing or insulation. If found, proper management and disposal will be followed per international good practices.

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

Similar to the Parent Project, the AF Project will improve access to secondary education. The project will invest in building schools and classrooms in areas where secondary schools are thinly spread. The school and nearby communities could be exposed to the risk of injuries, accidents and diseases associated with construction activities and vehicular movement within the project environment. Therefore, there is the potential for community health and safety impacts, which will need to be assessed and mitigated through the state specific ESMPs. Potential social impacts may include increased risk of SEA/SH associated with the presence of the construction workforce. However, using local contractors close to the communities may help limit SEA/SH risks. In addition, any increase in vehicle movements associated with the construction activities, and local sourcing of materials, could also increase the risk of accidents involving community members and workers.

Construction in schools can also disrupt learning through dust emissions, noise, increased generation of solid waste, etc. Potential threats to people and communities may be posed by uncovered, barricaded, unfenced, and/or unsigned hazards such as excavated sites, trenches, and exposed electric cables.

New and renovated school infrastructure (components 1.1 and 1.2) must also ensure unimpeded access to all, including Persons with Disabilities. School infrastructure should also consider the design of latrines and hand washing systems, considering essential issues such as menstrual health, privacy requirements for adolescent girls and water-borne diseases, which will require prevention measures. The updated ESMF outlines the principles, procedures and steps to prepare the state specific ESMPs with due consideration for community health and safety issues. The ESMF includes general and sector specific Environmental Health and Safety Guidelines (EHSGs) for the identified subprojects. The client will include all agreed commitments to maintain community health and safety in the ESCP.

A Security Risk Assessment (SRA) has been conducted as part of the ESMF. The SRA recommends that each state develop a SMP to address potential security risks and social risks that may arise from security personnel interacting with communities, notably with female teachers and students. A Security Advisor will be engaged with the support of the state Government and state security apparatus. Third-party monitoring will also be utilized for hard-to-supervise areas of the projects. As security has been indicated as a pertinent risk, all the states will develop the SMPs within three months of Project Effectiveness. Where security or armed personnel are engaged in participating schools or project locations, it must be noted that the Project Proceeds (IDA Fund) will not be used to support the procurement of firearms. In addition, deployment of such personnel will follow the requirements of ESS4 and adopt the World Bank's Guidelines of the Good Practice Note on "Assessing and Managing the Risks and Impacts of the Use of Security Personnel." Overall, before deploying military or security personnel, the SPIU shall take measures to ensure that security personnel are:

1. Screened to confirm that they have not engaged in past unlawful or abusive behavior, including SEA/SH or excessive use of force.
2. Adequately instructed and trained regularly on the use of force and appropriate behavior and conduct (including concerning SEA and SH) and will adopt the Voluntary Principles on Security and Human Rights as the



relevant good international industry practice to meet the requirements of ESS4 (these will be provided in the revised ESMF).

3. Deployed in a manner consistent with applicable national law.

The SPIU shall promptly review all allegations of unlawful or abusive acts of any military/security personnel, take action (or request appropriate parties to take action) to prevent recurrence and, where necessary, report unlawful and abusive acts to the relevant authorities. In addition, accessible grievance arrangements shall be made publicly available to receive and facilitate the resolution of concerns and grievances with the Project, consistent with ESS10 and described in the SEP.

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

No new land would be acquired under the Project, and all construction will be undertaken in existing school compounds. Involuntary resettlement or land acquisition impacts, as set out in ESS5, will be excluded from project activities, and this will be set out in the ESCP. However, lessons learnt from the Parent Project indicate a few cases of areas that will require livelihood support for Project-affected persons (PAPs), primarily teachers or community members with gardens in school compounds that have not been fenced.

Community land donation is also relevant in some of the schools. This will be reemphasized in the updated ESCP. Adequate steps for the community land donation procedure are provided in the RPF which all SPIUs must follow where it becomes the case.

The Government has updated the existing RPF to include project information for the new states. When specific impact locations are known, and when more information is made available on land requirements of the Project, site-specific Resettlement Plans or Livelihood Plans shall be prepared where relevant. The RPF shall guide the preparation of site-specific Plans. The participating States shall cover the cost associated with compensation and resettlement assistance.

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

Although this standard is relevant, however, based on the implementation of the Parent Project, no critical habitats will be affected, as the construction of new schools are limited to lands within the existing school compounds. No invasive alien species are expected to be introduced by the project. No biodiversity offsets are expected to be needed. The updated ESMF assesses potential direct, indirect and cumulative impacts and it will apply the mitigation hierarchy to define measures to protect and reduce impact on ecosystems and biodiversity. The ESMF also outlines preventive and mitigation measures, such as restoration of nearby areas using native species that could be affected by clearing to restore landscape and provide shade for the schools and increase biodiversity conservation in the area.

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

This ESS is not relevant as there are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.



**ESS8 Cultural Heritage**

The Environmental and Social Assessment will identify the existence of tangible or intangible cultural heritage at project sites. The ESMF includes guidance regarding how to manage any negative impacts. Since the project will be financing some civil works, some excavation, movement of earth and impounding can be expected, although this will be very minimal and site-specific. These types of activities pose the possibility of encountering both known and unknown physical and cultural resources. Project activities are not envisaged to pose risks to cultural heritage since they will occur within the confines of existing schools and school compounds. However, excavation and other project activities may lead to encounter of physical and cultural resources such as gravesites. In addition, some states such as Nasarawa, Kogi and Kwara are known to have some cultural beliefs such as festivals, shrines in some parts of the states which may be impacted. The treatment of Physical Cultural Resources Management (PCR) including archaeological relics, fossils, human graves, shrines, sacred trees or groves that may be encountered will follow a Chance Finds Procedure that will be elaborated in the ESMPs.

**ESS9 Financial Intermediaries**

The Project will not involve the use of financial intermediaries.

**B.3 Other Relevant Project Risks**

Insecurity in the country, may limit project supervision and monitoring in accordance with the ESF. The project will explore the possibility of a Third-Party Monitoring Agency (TPMA) to assist the Recipient with Project supervision and implementation support in the event of travel restrictions as a result of security issues. Third Party Monitoring (TPM) will be key for independently monitoring the implementation of plans that seek to address social risks such as security risks and SEA/SH. As such, TPM will be critical in monitoring the implementation of Security Management Plans and the SEA/SH Action Plans – particularly in hard-to-supervise areas and conflict/fragile locations. In the event that security forces are warranted, appropriate measures will be taken as explained above in ESS4.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts**

**Is this project being prepared for use of Borrower Framework?** No

**Areas where “Use of Borrower Framework” is being considered:**

Public Disclosure



Not applicable

**IV. CONTACT POINTS**

**World Bank**

Contact: Aisha Garba Mohammed Title: Senior Education Specialist

Telephone No: 5359+401 Email: agmohammed@worldbank.org

Contact: Martin Elias De Simone Title: Education Specialist

Telephone No: 5359+32822 Email: mdesimone@worldbank.org

**Borrower/Client/Recipient**

Borrower: Federal Republic of Nigeria

**Implementing Agency(ies)**

Implementing Agency: Federal Ministry of Education

**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): Aisha Garba Mohammed, Martin Elias De Simone  
Practice Manager (ENR/Social) Maged Mahmoud Hamed Cleared on 15-Jun-2023 at 05:10:11 EDT  
Safeguards Advisor ESSA Johanna van Tilburg (SAESSA) Concurred on 27-Jun-2023 at 17:49:18 EDT

Public Disclosure