



# Concept Environmental and Social Review Summary

## Concept Stage

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

Date Prepared/Updated: 08/26/2020 | Report No: ESRSC01570



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Sierra Leone	AFRICA WEST	P172492	
Project Name	Accountable Governance for Basic Service Delivery		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Governance	Investment Project Financing	2/1/2021	3/31/2021
Borrower(s)	Implementing Agency(ies)		
Republic of Sierra Leone	Ministry of Finance (Fiscal Decentralization Division, PFM Reform Unit)		

Proposed Development Objective

The PDO is to strengthen the governments' institutional systems and capacity for accountability and management of resources to more effectively deliver basic services responsive to community needs, across all districts.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>50.00</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]**

The project aims to cover interventions that address:

- 1) Core public management systems (i.e., processes, procedures, tools) strengthening identified areas of PFM and procurement systems to support basic delivery at the local level
- 2) Skills development at central and local level as staff need to be both trained in existing basic administrative functions and be ready to absorb new procedures and tools)
- 3) Integrated monitoring data platforms (including citizen engagement) for improved management oversight, monitoring and accountability for key local level investments / services



- 4) Local development grants to enable service delivery, accessible on a competitive basis that incentivizes local structures for leadership, collaboration and coordination

#### **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 Project will be implemented in the capital, Freetown, and the regional and district headquarter towns and cities. Consequently, the Environmental and Social (E&S) contexts will be different amongst sub-projects and specific project locations. The sub-project with E&S footprint is incentivization of Local Councils (LCs) to invest in the completion and rehabilitation and upgrading of existing public assets including; rehabilitation of primary schools (including additional classroom construction); rehabilitation of health units, medical equipment, furniture, and beds; rehabilitation of water and sanitation infrastructure such as toilets in primary schools, gravity fed water supply, shallow wells, springs, public latrines, sewerage and waste dumps; and rehabilitation of public infrastructure such as bus shelters and village markets. Grant allocation will be based on a pre-defined menu of capital expenditures with a ceiling of up to U\$50,000 for an annual or semi-annual allocation. At this concept stage, the specific project locations for these interventions have not yet been identified. Nonetheless, the project has proposed a negative list to exclude interventions that will result in land acquisition or impact on sensitive ecosystems. All works will be in brownfield areas (in existing facilities), implying that the footprint will be small.

However, the Local Councils (LCs) will be responsible for the execution of the works in collaboration with the Implementation Agencies (IAs). The project will span both urban and remote areas with stark difference in poverty rates. Early marriages, poor sexual and maternal health services, low financial inclusion and high incidence of gender-based violence (GBV) are constraining development advancement in Sierra Leone. Within this context, where civil works will be undertaken within schools, clinics, and other public facilities with proximity of workers to school children and staff, potential rate of sexual interaction between workers and minors can exacerbate the risk of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). Increase in transactional sex as a result of construction workers' disproportionately higher wages within low income communities, search for jobs and recruitment opportunities could provide basis for sexual harassment and exploitation of girls and women. However, the project will mitigate SEA/SH risks and impact in accordance with the World Bank Good Practice Note (GPN) on managing SEA/SH risks related to civil works.

The project's implementation will be guided by the Environmental and Social Standards (ESS) requirements of the Environmental and Social Framework (ESF) of the World Bank. Given that the specific sub-project locations are yet to be determined at the concept stage, an Environmental and Social Management Framework (ESMF) and Stakeholder Engagement Plan (SEP) will be prepared. The ESMF will set out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts of the project. In addition, the ESMF will outline the institutional measures to be taken during the preparation and implementation of the relevant ESSs, including capacity building activities.

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

The project will comply with the requirement of national environmental and social laws and the World Bank ESSs. A number of challenges however, including, weak institutions and systems, inadequate human and material resources or weakness in the collaborative networks among actors can affect implementation of the ESSs.

The Public Financial Management Reform Unit (PFMRU) in the Ministry of Finance (MoF), National Monitoring and Evaluation Department (NaMED) within the Ministry of Planning and Economic Development (MoPED), and the Fiscal Decentralization Department (FDD) in the MoF will be the implementing agencies and will provide overall administrative oversight and coordination for each of the Project’s three components. The specific technical aspects of sub-components of the project will be executed by other agencies including the Directorate of Science and Technology (DSTI) in the Office of the President, Local Councils (LCs) and Civil Society Organization (CSOs). The PFMRU, NaMED and FDD have no existing environmental and social management system and procedures in place, however the FDD is recruiting Environmental and Social Safeguards Officers (ESSOs) as part of another project under preparation – Resilient Urban Sierra Leone Project. Although ESSOs are part of LCs core staff, they have no experience implementing the requirements of the ESF. There are also issues such as high turnover of these ESSOs and E&S performance is hampered by low remuneration, and lack of logistics, training and transportation to perform their assigned functions, low level of priority assigned to E&S safeguards by the LCs, ESOs not receiving the level of support required to perform their duties. Thus, in terms of the requirement to address issues of SEA/SH and other Bank corporate commitments, the technical, logistical and human capacity within the three entities to ensure effective implementation and monitoring of safeguards is currently either limited or non-existent. The project will support as part of capacity building technical assistance, additional skill building training and logistics to improve E&S capacity and implementation.

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

**A. Environmental and Social Risk Classification (ESRC)** Moderate

**Environmental Risk Rating** Moderate

The potential environmental risks associated with planned civil works under Component 3, is moderate. It is envisaged that the project will support the completion, rehabilitation and upgrading of existing public assets in eligible LCs. Because these physical improvements and expansions of school infrastructure will be within existing school compounds, the loss of vegetation and faunal habitat will be minimal. Therefore, the project’s construction activities will only generate minimal adverse impacts that will be site specific and limited to the immediate environs and can be mitigated through the implementation of cost-effective measures. The main environmental impacts anticipated include: (i) nuisances related to air and noise emissions; (ii) disposal and management of waste from construction of physical improvements and expansions of infrastructure and eWaste from envisaged purchase of IT and computer equipment; (iii) health and safety of students, teaching staff, health workers, service users, visitors and other members of the community during the construction phase; (iv) traffic management; and (v) occupational



health and safety of workers. The measures that will be put in place to mitigate these impacts will be clearly spelled out in the ESMF and reflected in the Environmental and Social Commitment Plan (ESCP).

**Social Risk Rating**

Moderate

The Project’s Social Risk is rated as Moderate. Proposed project grants to LCs will only support the rehabilitation of existing public facilities such as primary schools; health units, medical equipment, furniture, beds; toilets in primary schools, gravity fed water supply, shallow wells, springs, public latrines, sewerage and waste dumps; bus shelters and markets. These interventions are not expected to result in new land acquisition because the public assets that will be rehabilitated are expected to be on lands already owned by the LCs, thus substantially limiting the potential for displacement. Labor influx into communities for the rehabilitation and upgrading of existing public assets is expected to be minimal as contractors will mostly utilize local workers from the subproject locations. Notwithstanding, ensuring the health and safety of workers during the construction and operational phases to prevent accidents and COVID-19 virus transmission, and clear working conditions is critical. It is equally important to ensure the safety of communities from vehicular accidents during haulage of construction materials, dust, noise, and improper waste disposal. Increase in transactional sex as a result of construction workers’ disproportionately higher wages within low income communities, search for jobs and recruitment opportunities could provide basis for sexual harassment and exploitation of girls and women. The project’s ESMF will assess these social risks in detail including SEA/SH risk assessment and preventive measures in line with World Bank good practice note for addressing SEA/SH in civil works. Critically, the project will also seek to mitigate the risk of exclusion of persons with disabilities, ensuring that they are not excluded from project consultations and planning designs of civil works to enhance accessibility.

**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 will utilize this standard to assess and manage the associated environmental and social risks and impacts. The project’s environmental and social risk rating takes into account the potential risks and impacts associated with the civil works that will be implemented, as well as the client’s capacity to implement the requirement of the World Bank’s ESSs. The nature and scope of the project’s anticipated risks under Component 3, are not expected to be adverse given that civil works will not be complex and will be limited to existing public assets. In addition, no natural or sensitive habitats are anticipated to be affected by the civil works. In order to minimize adverse impacts, civil works will be undertaken outside of school hours. In case, work has to be done during school hours or clinic session, pupils, students, teachers, health workers and patients will be exposed to construction hazards. Strict supervision and adherence to the requirements of the Sierra Leone Environmental Protection Agency (EPA) and World Bank’s ESF will be put in place in order to mitigate risks such as; (i) air and noise emissions, (ii) disposal and management of waste from construction of physical improvements and expansions of infrastructure as well as eWaste from envisaged purchase of IT and computer equipment, (iii) health and safety of students, teaching staff, health workers, service users, visitors and other members of the community during the construction phase, (iv) occupational health and safety of workers etc. The anticipated influx of workers into project sites is expected to be minimal and contractors are not expected to set up workers’ camps given the limited scale of work. Contracting firms will promote the use of workers from the project’s locality. However, the possible labor risk associated with the project may include poor labor working conditions, grievances over recruitment processes and selection, and protection of female workers. A

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standalone Labor Management Procedure may not be required but labor management provisions as part of the ESMF will be required with provisions for contractors to establish workers' complaints mechanism linked with the overall project GRM during implementation. The project ESMF will include Gender and GBV risk assessment to ensure gender inclusion in the design for the rehabilitation works. The risk of SEA/SH is rated moderate using the World Bank's corporate SEA/SH Risks tool. The ESMF will also provide information on disposal and management of waste from construction of physical improvements as well as eWaste from envisaged purchase of IT equipment. Mitigation measures to minimize and respond to SEA/SH risks and impact from civil works will be carried out in accordance with the World Bank GPN for addressing SEA/SH risks related to civil works. These will include requirement in bidding documents and procurement contracts for contractor ESMP to include a Code of Conduct that prohibits sexual harassment and exploitation, training of workers on the behavior obligations under the CoCs, ensure project GRM includes confidential mechanisms for SEA/SH complaints and accountable framework for SEA/SH response etc. Rehabilitated facilities will include safe and universal design to accommodate particular needs of women and persons with disabilities. The contractor ESMP will also include a detailed plan on the management of construction waste and eWaste from envisaged purchase of IT and computer equipment.

COVID-19 Transmission risks: Workers mobilized for the rehabilitation works could be a potential pathway for spreading COVID-19 among workers and the communities. The project ESMF and ESMP will include clear procedures and mitigation measures to avoid or limit the chances of infection among project workers and the communities. The mitigation measures will follow the April 7, 2020 World Bank interim guidance on COVID-19 consideration in construction or civil works, stakeholder engagement tip-sheet and WHO guidelines on COVID-19 preparedness and prevention.

At this stage the project location and potential project areas of influence are unknown. The project will therefore prepare an Environmental and Social Management Framework (ESMF). This ESMF provides guidance for site specific Environmental and Social screening. Environmental and Social Management Plans (ESMPs) as appropriate will be prepared during implementation. In addition, the client will prepare and implement the activities set out in the ESCP. It will also establish and implement the SEP prior to project appraisal.

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

Reliance on Borrower's framework will not be relevant to the project.

**ESS10 Stakeholder Engagement and Information Disclosure**

The standard is relevant. The client will prepare a Stakeholder Engagement Plan to ensure that a systematic approach to stakeholder engagement and information disclosure is established consistent with ESS 10. The SEP will identify assess the level of project impact on stakeholders as well as their interest and support for the project in order to enable stakeholders' views to be taken into account in project design and environmental and social performance; build and maintain a constructive relationship especially with project affected parties; promote and provide means for effective and inclusive engagement throughout the project life cycle; ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible,

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and appropriate manner and format; provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow the client to respond to and manage such grievances effectively.

Already as part of project concept, the Bank team and the client have held several consultations with a range of stakeholders including MoF, MoPED, DSTI, LCs, Ministry of Basic and Secondary School Education (MBSSE), Ministry of Health and Sanitation (MoHS) and CSOs, but this is currently limited largely to government stakeholders at the national level. It is expected that, broader stakeholder engagement will be undertaken during project preparation inclusive of the the views and concerns local community members, vulnerable and commonly marginalized groups. In consultation with the Bank team, the PFMRU, NaMED and FDD will prepare the SEP, outlining a comprehensive list of key stakeholders and the methods that will be used to consult with them including needs of vulnerable and disadvantaged groups such as persons with disability, women groups, youths etc to ensure their participation and to inform an inclusive project design. It is however recognized that, the outbreak of COVID-19 with restrictions in movements and exercise of physical distancing may impact requirement for public consultations. At the time of preparing the SEP, the project will review the country COVID-19 spread situation in the project areas and restrictions in place to design the most appropriate approach, method and forms of engagements to minimize the risk of COVID-19 spread during various engagement activities. The SEP will include a comprehensive M&E framework to monitor its implementation, as well a GRM to resolve complaints. The SEP is a living document and will be reviewed during implementation. Any major revisions effected to the SEP during implementation will be publicly disclosed to stakeholders.

## **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**

As already indicated, it is anticipated that the project’s footprint will be relatively small and unlikely to involve a large-scale influx of skilled and unskilled labor in sub-project communities. The project will involve direct works including civil servants from the implementing agencies and possibly, some individual consultants. Contracted workers will be hired for the rehabilitation works. The project will mainly use local labor within the communities. No voluntary labor from the community is expected and it is envisaged that there would not be a need for the establishment of workers’ camps and migrant labor. The probable labor risk may include health and safety of workers during the construction and operational phases, general labor working conditions, community grievances over recruitment processes and selection, and protection of female and other vulnerable workers. With uncertainties around COVID-19 and when the pandemic will be over, workers mobilized for construction works could be a source of transmission of the virus. At this stage the number of workers required in each group is unclear. It is expected that the direct workers will be civil servants and therefore subject to their existing contracts. ESS2 requires the PFMRU, NaMED and FDD to promote sound workers and management relationships and enhance the development benefits of the project by treating workers fairly and by providing safe and healthy working conditions. This will include:

- Ensure adequate supplies of PPE (particularly facemask, gowns, gloves, helmet, handwashing soap and sanitizer) are available
- Ensure adequate OHS protections in accordance with General EHSs and industry specific guidelines and follow evolving international best practice in relation to protection from COVID-19;
- Prohibit the use of forced labor or conscripted labor, Sexual exploitation and Abuse and Sexual Harassment



- Include OHS code of conduct (CoC) and CoC for SEA/SH prevention in workers contracts
- Provide ongoing training on the procedures to all categories of workers, and post signage in all public spaces mandating hand hygiene and PPE
- Develop a basic, responsive grievance mechanism to allow workers to quickly inform management of labor issues, such as a lack of PPE and unreasonable overtime.

The project will make these provisions part of the ESMF and contractor ESMPs.

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

By virtue of the nature and scale of project activities, the environmental footprint is anticipated to be small, as construction works are small scale and brownfield. The following specific aspects in relation to ESS3 will be considered:

**Inefficiency from sourcing of raw materials:** the nature and source of the raw materials used in construction work is key to the success of the project. Materials shall be selected to reflect the prevailing climatic conditions, whilst taking into cognizance the convenience of the occupants or users of the facilities. Cement, sand, timber, aggregates and sticks will be obtained from certified or licensed suppliers, or approved local sources, in close proximity to the project site to reduce transportation related impacts. Materials will not be obtained from sources that could exacerbate deforestation, community potable water, coastal erosion or global warming. Due diligence will be conducted to ascertain the environmental compliance of suppliers and third party.

**Air emissions:** Air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by compaction and construction activities. Those most likely to be affected are people living close to the project site, and those prone to respiratory infection, such as children and the elderly. While the scale, intensity and duration of the impact is expected to be small, dust and noxious substance emission should be minimized through dust suppression and regular vehicle maintenance.

**Noise:** Noise levels will vary with the project environment. Remote areas are more likely to experience a higher impact due to the difference between ambient levels and the elevated noise from contractor mobilization. Work will be limited to daytime and on week days. The contractor will observe the decorum and calendar for local events by suspending all noise generating activities during religious or cultural/traditional occasions to prevent conflict with the community.

**Waste management:** Liquid and solid waste will mainly include scraps from buildings, construction wastes, excavated soil, oils from construction machinery, concrete blocks, metal and glass pieces and domestic wastes. Waste will be segregated, stored and disposed of at approved sites. Of particular importance is the assessment of whether asbestos wastes are likely to be present and, if so, the proper mechanism of handling, transporting, and disposal by competent contractors.

Assessment and management of adverse environmental risks and impacts during construction, operation, and decommissioning will be done according to ESS3 and Environmental Health and Safety Guidelines (EHSG).





Green house gas (GHG) emissions generated from the project are not likely to be significant. Hence GHG emission estimation is not relevant for the project. Provisions to assess impact of climate change on the project will be included in the ESMF.

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

Given that project's civil works will mostly be undertaken in public facilities such as schools and health centres, maintaining the health and safety of school pupils, school staff, health workers and patients, vendors, visitors and nearby communities throughout the construction phase will be critical. Movement of heavy-duty vehicles can lead to accidents and construction in schools and health centres might disrupt learning and service delivery as a result of dust emission, noise, and increased generation of solid waste. In addition, possible threats to people and communities can be posed by uncovered, barricaded or spots without signage such as excavated sites, pits and trenches. Children and young people are mostly vulnerable and therefore must be protected from potential sexual exploitation and abuse by contractors, and public assets rehabilitated under the project must ensure they conform to the needs of persons with disability and granted unimpeded access. Further, the project ESMF and ESMP will assess site specific Community Health and safety risks and impacts on the affected communities during the project life-cycle and will establish how the project activities will be carried out in a safe manner with (low) incidences of accidents and incidents in line with national and legal requirement, Environmental Health and Safety Guidelines (EHSG) as well as measures in place to prevent or minimize the spread of infectious diseases including COVID-19 and emergency preparedness measures. Also, measures will be taken for SEA/SH prevention in line with the World Bank GPN for addressing SEA/SH in civil works. The SEP will pay special attention to organize information into different categories to ensure targeting and delivery of the relevant, right and adequate information for different phases and different groups including disadvantaged and vulnerable groups. The project will also make available a functioning GRM as referenced under ESS10.

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

This standard is currently not relevant. The project is not anticipated to generate any new physical infrastructure that will result in land acquisition. Eligible sites will not only be screened out for ownership but also for livelihood use and squatters.

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

This standard is not currently relevant. The project's physical activities will take place within existing public assets. Nevertheless, the ESMF will provide guidance on screening and instituting mitigation measures to ensure that project activities do not impact negatively on any critical or sensitive natural habitats, especially wetlands or biodiversity and living natural resources.

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

The standard is not relevant. There are no known Indigenous Peoples in the Sierra Leone.



**ESS8 Cultural Heritage**

The project’s civil works will take place within existing public facilities and are not envisaged to any impacts on physical, cultural, or archaeological sites. Nonetheless, the project will take into account existing tangible and intangible cultural heritage sites and items, including potential archaeological heritage within the project’s area, ensuring that necessary measures are adopted through consultations with stakeholders regarding cultural heritage and implementing basic mitigation measures.

**ESS9 Financial Intermediaries**

This standard is not relevant at this stage given that the project will not utilize Financial Intermediaries for execution of any the project’s activities.

**C. Legal Operational Policies that Apply**

<b>OP 7.50 Projects on International Waterways</b>	No
<b>OP 7.60 Projects in Disputed Areas</b>	No

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

**A. Is a common approach being considered?** No

**Financing Partners**

Currently, the World Bank is the sole financier of the project and there are no other financial partners involved in the project.

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

**Actions to be completed prior to Bank Board Approval:**

Actions to be completed prior to Appraisal:

- Preparation, consultation and disclosure of Environmental and Social Management Framework (ESMF). This will include SEA/SH and labor risk assessments;
- Preparation and disclosure of Environmental and Social Commitment Plan (ESCP)
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP) including a grievance redress mechanism (GRM);

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

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- Institutional arrangements for the management of ESSs, including the hiring of the relevant environmental and social staff in the PIU;
- Development and implementation of institutional environmental and social capacity strengthening plan;
- Preparation of construction ESMPs at the beginning of the project implementation;
- Development and implementation of a proportional Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction & rehabilitation activities) at the beginning of the project implementation.

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

31-Mar-2021

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: Republic of Sierra Leone

**Implementing Agency(ies)**

Implementing Agency: Ministry of Finance (Fiscal Decentralization Division, PFM Reform Unit)

**V. FOR MORE INFORMATION CONTACT**

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## **The World Bank**

Accountable Governance for Basic Service Delivery (P172492)

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**VI. APPROVAL**



Task Team Leader(s):	Shomikho Raha
Practice Manager (ENR/Social)	Senait Nigiru Assefa Recommended on 26-Aug-2020 at 09:19:48 EDT
Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Cleared on 26-Aug-2020 at 09:54:46 EDT