

Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 18-Jul-2018 | Report No: PIDISDSA24819



BASIC INFORMATION

A. Basic Project Data

Country Cabo Verde	Project ID P164294	Project Name Education and Skills development Enhancement Project	Parent Project ID (if any)
Region AFRICA	Estimated Appraisal Date 18-Jun-2018	Estimated Board Date 25-Sep-2018	Practice Area (Lead) Education
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Education	Implementing Agency Unidade de Gestao de projectos	

Proposed Development Objective(s)

The Project Development Objective is to strengthen foundational skills and improve the relevance of training programs to the country's strategic development plan.

Components

Support to the Basic Education Sector Reform Support to demand-based training financing schemes Support to the Education and Skills Development Reforms and Project Management

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	10.00
Total Financing	10.00
of which IBRD/IDA	10.00
Financing Gap	0.00

DETAILS

World Bank Group Financing

International Development Association (IDA)	10.00
IDA Credit	10.00



Environmental Assessment Category

C-Not Required

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)



B. Introduction and Context

Country Context

1. A middle-income African Small Island State located in the central Atlantic Ocean, Cabo Verde has made substantial development progress and currently has the highest GDP per capita in West Africa and the 9th in Sub-Saharan Africa (SSA). Between 2000 and 2007, Cabo Verde's 6 percent annual growth translated into considerable poverty reduction and boosted shared prosperity, allowing it to graduate from low-income status in 2007. In 2016, its gross national income (GNI) per capita was US\$ 2,970, almost six times what it was in 1982¹. Anchored in stable political institutions and a strong human capital base, the country's economic performance is attributable to significant investment in infrastructure linked to the promotion of the country as a tourist destination. Cabo Verde is renowned for its political freedom, rule of law, year-round attractive climate and rich culture. Diaspora remittances which approximate 12.5 percent of GDP (2015), have been an important part of the success story providing a lifeline to segments of the population, and allowing the lower-middle income country to sustain its high consumption rate and to finance a large trade deficit.

2. The country has also witnessed a sustained decline in the number of poor and has high human capital achievements. Using a national poverty line of PPP US\$5.60 per day, the incidence of poverty fell from 58 percent in 2001 (when poverty measurement began) to 35 percent² in 2015, while extreme poverty, using the national food poverty line of PPP US\$2.90 per day, dropped by two-thirds to 10 percent during this period. Following consistent historic investments in social service delivery, Cabo Verde also outperforms its peers on most non-monetary dimensions of poverty including life expectancy, maternal mortality, net primary school enrollment, and access to an improved water source. It is among the few countries in the world to have achieved all of the Millennium Development Goals.

3. A lack of economic prospects for disadvantaged groups leads to social exclusion and could potentially undermine social cohesion. The high unemployment rate, especially among youth (63 percent of the 15- to 24-year-olds in Praia are unemployed), threatens to lead to behavioral problems. The lack of economic prospects lures poorly schooled youngsters to join urban gangs. Juvenile crime and drug abuse are rising, potentially threatening the tourism industry. Cabo Verdeans increasingly feel unsafe, and there is also some evidence that discontent and dissatisfaction are rising³. In addition, Cabo Verde's demographic transition is taking place faster than elsewhere in Africa, placing increasing pressure on the labor market. The share of the population that is of working age has been rising since 2000 and is expected to peak around 2030⁴, compared with an expected peak in 2080 for SSA.

Sectoral and Institutional Context

4. Cabo Verde has made significant progress in expanding access to education but learning outcomes at the primary level remain relatively low. The Net Enrollment Rate (NER) in primary education has improved from 91.7 percent in 2006 to 98 percent in 2014. Even though preprimary education is not compulsory, significant progress has been made in coverage with 85 percent of children ages 4–5 enrolled in preschool education. Cabo Verde has among the highest education indicators in Sub-Saharan Africa: targets of the Millennium Development Goals on primary education access have been achieved since 2012; the school-life expectancy is on average 13.5 years; and 98 percent of the population ages 15–24 is literate.⁵ However, learning outcomes at the primary level remain relatively low. The

¹ Source: World Development Indicators

² As the general poverty rate is 35 percent, the poor nearly overlap with the bottom 40 percent, the target group for raising shared prosperity, which is one of the World Bank's twin goals.

³ Afrobarometer R5 2011/13 and R6 2014/15

⁴ Country Economic Memorandum (2013); Heloisa Marone (2016) Demographic Dividends, Gender Equality, and Economic Growth: The Case of Cabo Verde. IMF working paper 16/169.

⁵ UNESCO data, accessed February 2017. <u>http://uis.unesco.org/country/cv.</u>



2010 Aferida, a national large-scale assessment for Grade 6 students, revealed both high variability between individuals and lower-than-expected overall learning outcomes. The average grade was 8.7/20 in mathematics and 7.8/20 in Portuguese. A sector analysis⁶ indicates issues of quality relating to several factors, including (a) lack of sufficient inservice teacher training; (b) Portuguese being used as the official language of instruction, while for many students it is their second language (Creole being their first); (c) lack of focus and resources on pedagogical aspects (as compared to social programs⁷); and (d) insufficient levels of autonomy for management at the local levels.

5. Access to secondary education has also improved but remains below the country's aspirations. Although transition rates to secondary school in Cabo Verde are high (85 percent), the NER of secondary education was only 69 percent in 2014, which is much lower than those of its aspirational peers. Dropout and repetition rates have been relatively high at the secondary level, especially for Grades 7 and 8, for the past 15 years, suggesting serious structural difficulties. Only 65 percent completed Grade 9, and only 44 percent of the relevant age cohort completed Grade 12 in 2013⁸. Repetition rates, which are rather moderate at the primary level (9 percent), are considerably higher during secondary education (24 percent during the first sub-cycle of Grade 7 or 8; 35 percent by Grade 12). The issue of student retention at the secondary level is likely due to a combination of factors including inadequate primary school learning; inadequate curriculum and low quality of educational services that insufficiently motivate adolescent learners; lack of household resources to pay for schooling (including transport); and lack of job prospects for school leavers, undermining motivation. It is worth mentioning that 23 percent of teachers in secondary school are without a degree—*nao licenciados*⁹—a figure that differs substantially across schools, which would affect quality of teaching overall and imply unequal opportunities for children to learn.

6. Relevant skills development opportunities are limited and often do not meet the needs of the economy. The high percentage of students leaving the secondary level before graduation results in a large amount of young people without sufficient qualifications and competencies, who thus face difficulties in the job market. On the other hand, the technical and vocational education and training (TVET) system has a low coverage and accounts for only 5 percent of secondary-level enrollment.¹⁰ The current TVET system is characterized by a supply-driven, dispersed offering of professional and technical trainings and does not constitute a true system that is well articulated to meet job market demands. There are very few initiatives to promote partnerships with industries and employers (that is, public-private partnerships). Technical education, which is under the MoE and offered at Grades 11 and 12, remains marginal with limited enrolment and outdated content. Vocational/professional training has been transferred to multiple ministries over the past years (now under the Ministry of Finance (MoF), and there is an overall lack of coordination and coherence between general, technical/vocational, and higher education streams.

7. Youth unemployment has been rising over the past years, especially in urban areas. In 2016, 49 percent of the urban youth ages 15–19 and 38 percent for those ages between 20 and 24 were unemployed.¹¹ In Praia, 63 percent of the youth ages 15–24 were unemployed. A higher level of education increases the likelihood to be unemployed.

⁶ Eléments d'analyse sectorielle de l'éducation à Cabo Verde, UNICEF 2015.

⁷ For example, pedagogical expenditures represented only 1.2 percent of total spending at the primary level, while social expenditures, including school canteen, despite the lack of a targeting system, accounted for 14.8 percent of total expenditures at the primary level in 2014. *Eléments d'analyse sectorielle de l'éducation à Cabo Verde*, UNICEF 2015.

⁸ Inquérito Multi-objectivo Contínuo (IMC), a multi-dimensional survey, introduced in 2012 to replace several householdsrelated surveys.

⁹ Atchoaréna, Da Graça, and Marquez, Comparative Education 2008. Strategies for post-primary education in small island developing states: Lessons from Cape Verde

¹⁰ Cumulated student enrollment for the first and second year of secondary level. *Eléments d'analyse sectorielle de l'éducation* à *Cabo Verde*, UNICEF 2015.

¹¹ Instituto Nacional de Estatísticas, [INE], IMC 2016. *Estatísticas do emprego e mercado do Trabalho* (Cabo Verde labor market statistics for 2016, released April 2017).



Unemployment rates among individuals with only primary education reached 8.3 percent compared to 20.7 percent for those with postsecondary education¹². This situation has led to a certain level of discouragement among young Cabo Verdeans, as shown by the recent results of IMC 2017, about one in three young people (31.4 percent) ages 15–24 are not in employment, education, or training. This proportion exceeds 50 percent in some regions and is more than 42 percent for girls in rural areas.

8. There is also a gender factor, as overall unemployment rates for women (17 percent) are higher than for men (13 percent). At the secondary education level and below, women's unemployment is lower than men's; however, it begins to rise afterward, and at the tertiary level, women's unemployment is 13.2 percent versus 9 percent for men. Existing gender norms grant women almost exclusive responsibility for domestic chores, children's education, and family care, restricting their opportunities to participate in the labor market and severely reducing their agency. A time use survey conducted in 2012 by the National Institute of Statistics (Instituto Nacional de Estatísticas, [INE]) showed that on average, women spent 3.5 hours more per day than men on unpaid work. Available evidence suggests that this plays an important role in explaining many women's late entry into the labor force. Together with the high levels of unemployment among young women, this increases the likelihood of informality, underemployment, and job vulnerability. Although Cabo Verde performs well on other gender indicators, it ranks only 115th on 'economic participation and opportunity for women' in the global gender gap index. Analysis suggests that closing the gender gap in labor market participation could increase GDP by as much as 12 percent.

9. Youth unemployment is in part caused by a mismatch between available skills and the demands of a competitive services sector. The inability to obtain adequately trained personnel is identified by firms as a major constraint.¹³ A good example is the tourism sector, which accounts for approximately one-fourth of available jobs. While the rate of local employment is relatively high in the tourism sector, ¹⁴ employment of nonlocal labor, particularly for higher skills, represents a significant leakage. There are gaps in skills training as corroborated by Cabo Verde's low score (82nd out of 141) in 'Human Resources and Labor Market' of the Travel and Tourism Competitiveness Index. Higher education also has limited relevance for the labor market with the distribution of students per subject area unaligned with access to employment: 70 percent of university students enroll in Humanities and Social Sciences, 20 percent in Sciences and Engineering programs, and 10 percent in Life, Environment, and Health Sciences programs. As a result, unemployment among higher education graduates is high, while firms say they have difficulty finding qualified workers with the right skills.

10. Despite the remarkable achievements in terms of equitable access to education, financial barriers persist for the secondary level and above. Educational attainment and secondary school enrollment have improved substantially for the poor during 2001–2015, but differences across wealth groups remain significant. While 87 percent of youth ages 19–24 that are non-poor have at least a secondary education, only 77 percent of the moderately poor and 64 percent of the extreme poor have a secondary education. Education costs have more than doubled during 2001–2015 for all wealth groups, and their burden on household budgets has grown according to IDRF¹⁵ 2001 and IDRF 2015 data. Costs include school fees, uniforms, materials, and transport. In particular, a main concern expressed by various stakeholders is that almost all TVET training opportunities have high costs (especially in terms of course fees) and that the population targeted to attend these vocational/professional trainings does not have sufficient funds to pay. Often students attend and complete the full course or training but then do not receive their certificate due to unpaid school/course fees.

¹² INE 2015.

¹³ World Economic Forum Global Competitiveness Report 2015–2016.

¹⁴ 87 percent according to the 2010 Census.

¹⁵ Inquérito às Despesas e Receitas Familiares (IDRF): Households income and expenditures survey



Potential Gains in Efficiency

Cabo Verde allocates substantial budgetary resources to education, but the education system could yield savings through a more efficient use of resources. Between 2007 and 2016, Cabo Verde has invested between 5.3 percent and 6.1 percent of its GDP in education. Public expenditure per student at the primary level accounts for 20.8 percent of GDP per capita, which is considered substantially high by international standards. The unit cost per student at the primary, secondary, and tertiary levels is also high compared to international benchmarks. At the core of the educational process, pedagogical expenditures represent only 1.2 percent and 0.1 percent of total spending at the primary and secondary levels, respectively, in 2014, while social expenditures, including school canteens, account for 14.8 percent of total expenditures at the primary level¹⁶. Student-teacher ratios (STRs) are also well below the regional average and could be considered as favorable even by standards of the Organization for Economic Co-operation and Development.

Government Strategy

11. The Government's midterm vision is presented in its Strategic Plan for Sustainable Development (*Plano Estratégico de Desenvolvimento Sustentável*, PEDS) (2017–2021). The PEDS states four main objectives for the country: (a) making Cabo Verde as a mid-Atlantic circulation economy, benefiting from the unique geographical position and historical links of the country in between Africa, Europe, and the Americas; (b) ensuring economic sustainability; (c) improving social inclusion and reducing inequalities; and (d) strengthening sovereignty, valuing democracy, and orienting diplomacy for the challenges of the country's development. The education system is expected to contribute to those objectives through better quality of education at all levels, including through curriculum reform, the use of information and communication technology (ICT), and improved access particularly at secondary and higher education levels.

12. The specific objectives for the education sector are set out in the 2017–2021 Education Strategic Plan (ESP 17–21). In 2014–2015, a comprehensive Education Sector Analysis¹⁷ was undertaken, which highlights three main issues facing the education sector: (a) the need to improve the quality of basic education as indicated in low learning outcomes, (b) high number of dropouts in secondary education resulting in overall high unemployment in youth in Cabo Verde; and (c) inefficiencies with the management of the education sector. As such, the ESP 17–21 responds to these and is built around the following three main priorities: (a) gradually increasing universal access to preschool and basic and secondary school, (b) improving quality and relevance of education services, and (c) improving the efficiency and management of the education sector. These priorities will be implemented across the five main 'programs' of the education system: Preschool; Basic Education (Grades 1–8); Secondary Education (Grades 9–12); Higher Education, Science, and Innovation; and Education Management.

13. Within Basic Education, the main objective of the ESP 17–21 is to guarantee free and universal access to quality education from Grades 1 through 8. To achieve this, the MoE has centered its basic education plan around the following four main activities: (a) improving access to basic education, especially for the most vulnerable, through social action programs; (b) improving the school environment; (c) improving learning outcomes through the new curriculum and revised education structure; and (d) improving efficiency of the sector.

14. The Government is developing a skills development strategy to support the PEDS objectives. The Government created in May 2018 a Secretariat of State for Innovation and Vocational Training (SSIVT) under the MoF. The first mission of the SSVIT was to develop a skills development strategy with a view to consolidate and better coordinate the

¹⁶ Eléments d'analyse sectorielle de l'éducation à Cabo Verde, UNICEF 2015.

¹⁷ Eléments d'analyse sectorielle de l'éducation à Cabo Verde, UNICEF 2015.



various training programs and interventions, improve their relevance to the current and future needs of the economy and ensure their sustainability overtime.

15. Within this context, and to support the key priorities outlined in the ESP 17–21 and the Government's PEDS, the Government of Cabo Verde has requested support from the World Bank in addressing two of the most critical issues to the Cabo Verde education system: (a) low learning outcomes and overall quality within basic education and (b) lack of access to training opportunities aligned with the labor market.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

16. The objective of the Project is to strengthen foundational skills in education and improve the relevance of training programs to the country's strategic development plan.

Key Results

17. The Government of Cabo Verde is extending its free basic education system from six to eight years with the overall aim to strengthen foundational skills and improve learning and retention in secondary schools. The project will support this reform through improved quality inputs, including better alignment of curriculum and teaching practices with expected learning outcomes and increased autonomy to local players allowing them to adjust education services to the specific needs of the served communities and children.

18. The project will support increased relevance of training programs to the needs of the Cabo Verdean economy taking into account the strategic priorities of the country and contribute, in particular, to the development of the Tourism and Digital Platforms planned under the PEDS. This would be achieved through the restructuring of the FPEF into a Skills Development Fund (SDF) to adopt a demand-driven approach involving a stronger partnership with the productive sector.

PDO Level Indicators

The following PDO indicators will measure progress:

- i. Increase in percentage of students who successfully complete 8 years of basic education (% female)
- ii. Decrease in percentage of students who dropout at grade 7
- iii. Number of graduates from certified demand-driven training programs (% female)



D. Project Description

19. The proposed operation will build on the key priorities identified within the ESP 17–21 and the Government's PEDS. The proposed operation will be financed through an Investment Project. The project would be supported by three components: Component 1 will finance disbursement-linked indicators (DLIs) to support activities related to the implementation of the basic education reform with a specific focus on strengthening foundational skills under the new curriculum for grades one to eight; Component 2 will finance grants and scholarships to support the restructured Skills Development Fund; Component 3 will finance technical assistance (TA) to support both Components 1 and 2 and Project management related costs.

Component 1: Support to the Basic Education reform (US\$6.4 million)

20. Under the first component, the objective will be to support the ESP 17–21 with the expansion of the basic education system from six to eight years. Specific focus will be given to four key areas indicated within the ESP 17-21 as essential to improving the quality of basic education. These are the following: (i) revising the curriculum and pedagogy in line with the basic education reform; (ii) establishing and operationalizing a student assessment system; (iii) supporting teachers and other educational staff in the implementation of the reform; and (iv) preparing the various actors in the system to act with more autonomy and responsibility.

- **21.** Using a results-based approach through DLIs, the IDA Grant will finance the following key activities:
 - (a) Revision of Curriculum and Pedagogical Practices. This area will focus on the revision of the curriculum for basic education, taking into account the transition from six to eight years. In particular, it will focus on the major adjustments to the language and mathematics curriculum including (i) teaching Portuguese as a second language, (ii) introduction of French and English languages in Grade 5, and (iii) strengthening the overall focus on and approach to teaching mathematics.

DLI: Teaching materials for Grades 1–8 in Math, Portuguese, Science, and Foreign Languages developed and distributed as per the new curriculum

(b) **Establishing and operationalizing a Student Assessment System.** This area will support the establishment and operationalization of a student assessment system to properly accompany and monitor the education reform.

DLI: National standardized learning assessment conducted in primary schools

(c) **Support to Basic Education Teachers.** There are approximately 3,200 basic education teachers throughout Cabo Verde.¹⁸ This area will focus on activities related to the development of in-service teacher training models and increasing a support system for in-field coaching and mentoring of teachers, to equip all basic education teachers with the skills to understand and successfully teach the new curriculum for basic education.

DLI: Number of basic education teachers trained in the new curriculum

(d) **Empowering actors throughout the education system with more autonomy and responsibility.** Management of the education sector is highly centralized, despite the geographical segmentation of the



country. This area will support the decentralization process and provide local level *delegados* with increased autonomy and budget to more effectively address local-level issues.

DLI: Results-based management system piloted in four delegations

Component 2: Support to demand-based training programs (US\$2 million)

22. The second component will support the Government in operationalizing the restructured Skills Development Fund (SDF). The Project will provide both technical assistance (TA)Subcomponent 3.2) and funding to the restructured SDF (under this component) in the following areas: (a) strengthening the identification of skills needs in two priority industries (the demand side); (b) promoting a training system that is responsive to industry needs (the supply side); (c) establishing a scholarship mechanism that is sustainable and promotes equity and employability; and (d) developing a financing model for the skills development system that is sustainable. This component will finance grants to training providers to deliver demand-driven programs and scholarships to students and trainees to attend priority demand-driven training programs.

Subcomponent 2.1: Skills Development Grants (US\$1 million)

23. This sub-component will finance Skills Development Grants (Grants) to public and private training providers to cover costs associated with the elaboration and delivery of training programs for the priority skills to be identified for two industries (Tourism and ICT). The Grants will cover services and small equipment necessary to the elaboration and first year's operation of training programs.

Subcomponent 2.2: Scholarships (US\$1 million)

24. This sub-component will finance scholarships to about 2,000 young Cabo Verdeans selected based on the new criteria and procedures elaborated with support from the TA provided under Sub-component 3.2 of the project. Priority will be given to the training programs supported under Sub-component 2.1.

Component 3: Support to the Education and Skills Development Reforms and Project Management (US\$ 1.6 million)

25. This component will finance TA to support activities planned under Components 1 and 2, as well as specific costs related to Project management.

Sub-Component 3.1 Support to the education reform (US\$ 0.5 million).

26. This sub-component will finance TA to support the MoE in the implementation of the Basic Education reform with a specific focus on activities conducive to the achievement of the agreed DLIs. The TA will cover the following areas: (i) Development of specific training modules to develop socio-emotional skills for grades 7 and 8 students; (ii) Support to the reform of secondary education (Grades 9-12) curriculum; (iii) Elaboration of an in-service teacher training and professional development strategy; (iv) Capacity building to the newly created Assessment Unit and support to the decentralization pilot; and (v) Capacity building of the MoE to monitor the implementation of the School Infrastructure Plan.

Sub-Component 3.2 Support to the skills development sector (US\$ 0.8 million)

27. The project will provide TA for the restructuring of the FPEF into a Skills Development Fund (SDF) and to support

¹⁸ Eléments d'analyse sectorielle de l'éducation à Cabo Verde, UNICEF 2015.



the development of a skills development strategy. More specifically, this sub-component will finance the following TA activities: (i) assistance to the Tourism and ICT sector committees to be created under the Project in identifying priority job profiles and defining related competencies profiles; (ii) support training providers invited by the sector committees to deliver the training programs for the priority job profiles: (iii) design a sustainable financing scheme for skills development; (iv) redesign the student financing model for skills development; (v) support the operationalization of the government leadership Bolsa Global program; (vi) Development of a human capital projection model.

Sub-Component 3.3 Support to Project management (US\$ 0.3 million)

28. Project management costs to be financed by the Project include Project audit, verification of the achievement of DLIs and contribution to UGPE operational costs.

E. Implementation

Institutional and Implementation Arrangements

29. Implementing Entities:

- The Ministry of Education will be responsible for implementation of activities under Component 1 related to supporting the Education Strategic Plan and the education reform. The MOE will also have the technical responsibility of TAs activities under Sub-component 3.1.
- The FPEF/SDF will be responsible for the management of the grants and scholarships programs under Component 2.
- The Secretariat of State for Innovation and Vocational Training (SSIVT) will be responsible for implementation of TA activities under Sub-component 3.2.

30. The overall coordination of Project implementation will be the responsibility of the UGPE (*Unidade de Gestão de Projectos Especiais*,). The UGPE is familiar with the World Bank fiduciary procedures and its overall procurement and financial management performance is satisfactory. The UGPE will be in charge of all fiduciary aspects of the Project, and will appoint a Project Coordinator who will be responsible for providing training and support to Project implementing entities (MoE, FPEF/SDF and DGEFPEP), especially in the areas of procurement, project management, and monitoring and evaluation, as needed.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

G. Environmental and Social Safeguards Specialists on the Team

Gernot Brodnig, Social Safeguards Specialist Clarisse Torrens Borges Dall Acqua, Environmental Safeguards Specialist



SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	No	This a project that is classified and Environmental Category C under OP/BP 4.01 and no environmental safeguard policies are triggered. Thus the project is presumed to have no or limited environmental impacts and risks. Based upon the information available, the project environmental risk rating and environmental safeguard performance are assumed to be low and satisfactory, respectively. The ISDS confirms that no safeguards policies were triggered. The Environment Category for the project is a Category C.
Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats OP/BP 4.04	No	The project does not contemplate rehabilitation or new works in areas of natural habitats or that would significantly impact natural habitats.
Forests OP/BP 4.36	No	The project will not finance activities in forests or that could potentially affect forest resources or their management.
Pest Management OP 4.09	No	The project does not involve the purchase or use of pesticides.
Physical Cultural Resources OP/BP 4.11	No	The project does not contemplate rehabilitation or new works that could potentially affect physical cultural resources.
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	No	The project does not foresee the acquisition of land.
Safety of Dams OP/BP 4.37	No	The project will not support or rely on activities that ttrigger this policy.
Projects on International Waterways OP/BP 7.50	No	The project will not finance activities involving the use or potential pollution of international waterways.
Projects in Disputed Areas OP/BP 7.60	No	The project will not finance activities in disputed areas as defined in the policy.



KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The proposed activities of the project do not involve any physical works, civil works or rehabilitation and hence has limited interaction with the physical environment. The Borrower's institutional capacity for safeguards is considered as adequate given the environmental risks to be managed under this operation. No environmental safeguards policies are triggered and the Project is classified as Category C.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: N/A

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts. N/A

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

N/A

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

B. Disclosure Requirements

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

NA

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

NA



All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

NA

Have costs related to safeguard policy measures been included in the project cost?

NA

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

NA

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

NA

CONTACT POINT

World Bank

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Borrower/Client/Recipient

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Implementing Agencies

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APPROVAL

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Country Director:	Ivan Velev	21-Jul-2018