



Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 11/06/2018 | Report No: ESRSC00034



BASIC INFORMATION

A. Basic Project Data

| | | | |
|----------------------|---|--------------------------|----------------------------|
| Country | Region | Project ID | Parent Project ID (if any) |
| Sierra Leone | AFRICA | P167897 | |
| Project Name | Focusing Resources on Equity and Excellence of Education Project (FREE Education Program) | | |
| Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date |
| Education | Investment Project Financing | 4/25/2019 | 6/25/2019 |
| Borrower(s) | Implementing Agency(ies) | | |
| Ministry of Finance | Ministry of Basic and Secondary Education | | |

Proposed Development Objective(s)
To increase the number of students in better functioning schools.

| Financing (in USD Million) | Amount |
|----------------------------|--------------|
| Total Project Cost | 70.00 |

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

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

The proposed MPA program aims at providing long-term sustained investments and support to improve both school and system level’s performance. At school level, the program will focus on providing additional essential learning inputs and incentivizing more effective school management, community engagement and structured pedagogy. Schools participating the program are expected to (i) improve student attendance and progression; (ii) maintain teacher attendance and sustain teaching efforts; and (ii) enhanced parents and community engagement in school governance. At system level, three key pillars will be included in the program: (i) Curriculum, Textbooks & Learning Materials and Assessment; (ii) Teacher Development; and (iii) System administration, governance and financing. The

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government’s Free Quality Education program will serve at the platform for the effective coordination and alignment of these core education system components.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

It is broadly known that the project activities will take place in Sierra Leone, however, at this stage of preparation, the specific project locations have not yet been identified. All the three phases of this MPA operation will be guided by the Environmental and Social Polices of the World Bank; and the appraisal ESRS will provide some more details on the type of potential risks that might apply to future phases and the project locations should they be determined by that time.

D. 2. Borrower’s Institutional Capacity

The Ministry of Basic and Senior Secondary Education (MBSSE) is the main institution responsible for education in general in Sierra Leone. The project coordination unit will be housed within the MBSSE and work closely with local councils in the implementation of the project. The MBSSE does not have any capacity in the ESF. There is no role for safeguards officers as the MBSSE is structured now. However, the local councils have environmental health officers, but these do not have capacity either. The task team will conduct a more structured institutional capacity assessment prior to appraisal and support the Government team in the development of a capacity enhancement improvement plan as part of the Environmental and Social Commitment Plan (ESCP).

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

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The Environmental and Social Risk Classification for the project has considered the potential environmental and social risks associated with civil works especially excavations for the expansions of classroom blocks, demolitions of walls during renovations, replacement or roofing materials, installation of boreholes and construction of water and sanitation facilities including septic tanks. These environmental and social risks associated with these works are classified as moderate under the World Bank ESF. The moderate risk rating is proposed because the likely impacts will be site specific, limited to the immediate surroundings and can be managed through the implementation of cost-effective mitigation measures. At this stage of preparation, the specific schools where physical works will take place are yet to be identified, but based on the project description of the possible activities, key environmental and social issues will be related to (i) waste management of construction spoils, (ii) health and safety of students, teaching staff and visitors during the construction phase, (iii) disruption of classes as a result of air and noise pollution during construction (iv) erosion from earth works and run-off, and (v) impacts on water quality and quantity etc.

The client has no experience or capacity in applying the ESF and significant efforts will be required to build the capacity of MBSSE in the application of the ESF. The SL EPA as the regulatory agency has experience in the application of the existing World Bank Safeguards Operational Policies and a good number of experienced safeguards specialists. However, the agency does not have any experience in the application of the new ESF and will just like the MBSSE, need support to build their capacity in the expanded scope and application of the ESF.

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Social Risk Rating

Moderate

The Project supports construction and rehabilitation of school buildings/works, which will take place within existing school compounds. Anticipated land acquisition and restriction of use of land is expected to be limited to the immediate surroundings of the existing schools. Other social impacts such as labor influx, impacts on community health and safety including GBV risk, can all be managed through the implementation of mitigation measures. The rating also considered the capacity limitations, especially the lack of an environmental and social management system, amongst the MBSSE and EPA.

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:

From the preliminary review carried out at this concept stage, it can be concluded that MBSSE has no existing environmental and social management system and procedures and coupled with the SL EPAs limited capacity as the regulator, there is a need to develop the environmental and social management system for MBSSE to comply with ESS1 requirements. The Project will address the needed measures through the preparation and implementation of an Environmental and Social Commitment Plan (ESCP) to be prepared by the client and reviewed by the WB as early as possible and before project appraisal. Environmental and Social Assessment: Since the specific schools for investments have not yet been identified, an ESMF and RPF will be prepared, consulted upon and disclosed by the client in line with the requirement of the ESF and Environmental and Social Standards. This approach will allow for the screening of selected schools during implementation using the checklist to be developed and the development of associated Environmental Social and Health Impact Assessments (ESHIA), ESMPs and Resettlement Action Plans (RAPs) as may be required in conformance with ESS1 and the SL EPA environmental assessment guidelines (1999). Environmental and Social Management and Monitoring: The ESMF will include a generic Environmental and Social Management Plan with general mitigation measures for construction and operational phases, roles and responsibilities, time plans, costs and implementation agencies for each mitigation measures recommended. This generic ESMP will then be adaptable for specific schools as they become identified during project implementation. Contractors will be required, as a condition of their contracts with the Project, to implement and comply with the ESMP, including preparing construction management plans consistent with the specific management plans provided in the ESMP and measures will be put in place to monitor contractors and subcontractor's compliance.

Areas where reliance on the Borrower's E&S Framework may be considered:

The borrowers' framework will not be used for the project

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is key to the success and sustainability of the project development objectives. In consultation with the Bank team, the MBSSE will prepare and implement an inclusive Stakeholder Engagement Plan (SEP), paying special attention to the inclusion of vulnerable and disadvantaged groups including the elderly, persons with disabilities, female headed households, child headed households, orphans etc. The SEP will be proportional to the nature and scale of the project and associated risks and impacts identified. A draft of the SEP will be prepared

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and disclosed prior to Appraisal. The client will ensure that all consultations with stakeholders are timely, relevant, understandable and accessible (both in form and location) and through culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. If major changes are made to the SEP during project preparation or implementation, a revised SEP should be publicly disclosed. As part of the preparation of the ESMF, the borrower will maintain and disclose a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not. The project will also design a project-wide GRM which will enable stakeholders to channel concerns, questions, and complaints to the PIU (and where necessary to other actors at the local level). The GRM will be multi-faceted, to receive inputs from communities, and external stakeholders and respond to issues related to a broad range of project implementation issues. A channel for confidential reporting and redress mechanisms for GBV issues will also be laid out. Given that project locations will be dispersed geographically, the project should identify local actors as well as specific liaison officers at the PCU to help coordinate and implement the SEP.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project footprint is envisaged to be relatively small and will likely entail a moderate amount of skilled and unskilled labor. Given the nature of the works, the project will ensure that unskilled and skilled workers required for the works are sourced from local and surrounding communities to minimize the potential for labor influx from external communities. In view of the relatively small nature and scope of the civil works, and the use of mainly local labor residing within the communities, it is not expected that there would be need for the establishment of workers camps. Overall, the project will set up a proper labor management procedure to address labor and working condition related issues. Occupational Health and Safety (OHS): To ensure health and safety of workers during the construction and operational phases of the project, MBSSE will develop and implement a Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities). The plan will include procedures on investigation and reporting of incidences and non-conformances, emergency preparedness and response procedures and continuous training and awareness to workers. The task team will ensure that MBSSE is also familiar with the safeguards incidence response toolkit (SIRT) as a guide to report and manage incidents should they occur. Workers Accommodation: The Construction-ESMP will confirm if there will be onsite accommodation of workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

The overall level of environmental risks associated with the project is moderate. However, the following specific aspects in relation to ESS3 will be considered. Vegetation and soil loss: Loss of vegetation and faunal habitat will be minimal. Project physical activities are limited to improvements and expansions of school infrastructure within existing school compounds, the areas are already modified hence degradation because of additional infrastructure will be negligible. Required building material will potentially include stones, sand, concrete blocks and timber. Borrow material will be obtained from already existing and licensed borrow pits within Sierra Leone and possibly close to the project area to reduce the transportation distance. Should there be the need to open new borrow pits, the project



shall ensure that all national regulations and assessments and permitting requirements are adhered to and pits reinstated as may be required through the ESMP. Air emissions: Air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are school children, teachers, and people living in close to the construction sites. Mitigation measures such as dust suppression, vehicle maintenance etc will be applied to minimize the impacts and residual impacts are expected to be limited in scope and duration. Noise: Noise will likely be generated from use of construction machinery and vehicle movements. The relatively short-term and small-scale nature of the works suggest that noise levels will not be excessive. Construction works will be scheduled to take place during school vacations to limit the impact on children and persons in the schools. Waste management: Liquid and solid waste will mainly include excavated soil, oils from construction machinery, concrete blocks, metal and glass pieces from demolished walls etc. Waste will be segregated, stored and disposed at approved sites.

ESS4 Community Health and Safety

Since the project's civil works will mainly be undertaken in school's premises, maintaining the health and safety of schools pupils, school staff, vendors, visitors and nearby communities throughout the construction phase is critical. Movement of heavy goods vehicles can lead to accidents. Construction in schools can also disrupt learning through dust emission, noise, increased generation of solid waste, etc. Potential threats to people and communities may be posed by uncovered or barricaded or not signage spots such as excavated sites, trenches, open electric cables, etc. Children and young people must be protected from potential sexual exploitation and abuse by contractors. School infrastructure must also ensure unimpeded access to all including persons with disabilities. As part of the ESHIA, the potential risks and impacts on school children and staff, vendors and the local communities will be assessed and addressed in the project ESMPs. It is envisaged that a special traffic management plan may have to be prepared and implemented by the construction contractor to manage particularly traffic within the schools.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Component 1.2 will involve the construction of School Infrastructure including construction of new and rehabilitation and maintenance of classrooms blocks, Water, Sanitation and Hygiene facilities etc. While the project is expected to use school or government lands, in many cases, unused or underused state land is subject to occupation, sometimes by "squatters". The utilization of state land may therefore impact on livelihoods that will need to be identified through due diligence and appropriate mitigation measures. It is also frequently the case that government acquisition is not properly done or undocumented which can result in disputes over ownership and boundary demarcation. At this stage of preparation, the specific schools where physical works will take place are yet to be identified and as such, the likely nature and magnitude of involuntary resettlement impact is unknown. The project will therefore prepare, consult upon and disclose a Resettlement Policy Framework before appraisal to ensure that appropriate measures are in place to address any issues which might arise from potential land acquisition and or economic displacement under the Project. Once sub-projects are defined, and necessary information becomes available, the project will prepare site specific Resettlement Action Plans or Livelihood Restoration Plans (LRPs) proportionate to the potential physical or economic displacement risks.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources



The project physical activities will take place within existing school compounds, however, 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. The environmental risk with regard to ESS6 is expected to be minimal. In the unlikely event that significant risks and adverse impacts to biodiversity and habitats have been identified, a biodiversity management plan (BMP) will be prepared either as a standalone document or as part of the construction ESMP. With regard to primary suppliers, the project will establish system and verification practices (certification, licensing, permitting, etc.) to ensure that project goods or materials are sourced from sustainably managed areas.

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

Relevance of this ESS will be further assessed during Project preparation as part of the ESA process.

ESS8 Cultural Heritage

Since this project may involve excavations, demolitions, movement of earth within school compound this ESS appears relevant. The degree of relevance of this ESS will be further assessed during project preparation as part of the ESHIA process and appropriate steps taken to ensure conservation of cultural heritage during all phases of the project.

ESS9 Financial Intermediaries

Relevance of this ESS will be further discussed and assessed during project preparation as part of the ESHIA process.

B.3 Other Relevant Project Risks

Disadvantaged or vulnerable groups - The disabled persons constitute one of the largest vulnerable groups at risk of exclusion in the education sector of developing countries including Sierra Leone. In countries with conflict legacies such as Sierra Leone, many more children, women, and people of all ages will experience significant range of disabilities than would be found in a comparable area that has not undergone these impacts. Without consideration for disability-related needs and support, the project design may exacerbate this inequality and limit the ability of persons with disability from going to school and accessing quality learning. There are also other vulnerable and/or disadvantaged groups including female headed households, child headed households, orphans and vulnerable children which should be considered in the design. Risk of Gender Based Violence - Considering the close proximity of the contractor and workers in the schools within a country with high GBV prevalence rate (more than half of women and men age 15-49 having experienced physical violence at some point since age 15), and weak legislation to address sexual harassment and Domestic Violence, it is critical to put in place measures to protect school children and young people from potential sexual exploitation and abuse by contractors and workers. The borrower's Social Assessment will be comprehensive to include assessment related to Gender and GBV risks, project impact on vulnerable and individual groups including persons with disability, labor influx, existing formal and informal grievance systems etc. This will begin early at the preparatory stage to help shape the project design and components and inform relevant plans and processes (SEP, ESMP, RAPs, Grievance Redress Mechanism's (GRM), GBV mitigation plan, disability inclusion action plan etc.). The Bank task team will review the TOR to verify that it that it covers all relevant aspect proportionate to the anticipated risks.



C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

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

Actions to be completed prior to Bank Board Approval:

Actions to be completed prior to Bank Board Approval:

- Preparation of ESCP
- Preparation, consultation and disclosure of ESMF and RPF
- Preparation of Stakeholder Engagement Plan
- Institutional capacity assessment on safeguards
- Social Assessment

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

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

- Implementation of SEP
- Development and implementation of institutional capacity strengthening plan for safeguards
- Screening of sub-projects as the schools to be upgraded are determined
- Preparation of site specific ESHIAs and ESMPs as may be required after project screening
- Implementation of the ESMF
- Preparation of A/RAPs as may be determined by the RPF
- Establishment and implementation of Project GRM
- Implement Gender and GBV action plan
- Recruitment of Social and Environmental officers and community liaison officer.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 01-Apr-2019

IV. CONTACT POINTS

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Borrower: Ministry of Finance

Implementing Agency(ies)

Implementing Agency: Ministry of Basic and Secondary Education

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager Andreas Blom (PMGR) Concurred on 13-Dec-2018 at 08:40:6