

FEDERAL GOVERNMENT OF NIGERIA

ADOLESCENT GIRLS INITIATIVE

FOR

LEARNING AND EMPOWERMENT PROGRAM



FEDERAL MINISTRY OF EDUCATION

ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK (ESMF)



DRAFT FINAL REPORT

December 2019

Draft Final Report

Environmental and Social Management Framework (ESMF) for the Adolescent Girls Initiative for Learning and Empowerment Program

Federal Ministry of Education

Nigeria

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ABBREVIATIONS

CCT	Conditional Cash Transfers
EECD	Early Childhood and Care Development
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIAs	Environmental and Social Impact Assessments
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GBV	Gender Based Violence
GDP	Gross Domestic Project
GRM	Grievance Redress Mechanism
IDP	Internally Displaced Person
ILO	International Labor Organization
JSS	Junior Secondary School
LGA	Local Government Area
LMP	Labor Management Plan
NESREA	National Environmental Standards and Regulations Enforcement Agency
OHS	Occupational Health and Safety
PCU	Project Coordinating Unit
PDO	Project Development Objective
PIU	Project Implementation Unit
PMP	Project Management Plan
PMU	Project Management Unit
PPE	Personnel Protective Equipment
PTA	Parents Teachers Association
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SBMC	School Based Management Committee
SEA	Sexual Exploitation and Abuse
SEP	Stakeholders Engagement Plan
SME	State Ministry of Education
SSS	Senior Secondary School
STD	Sexually Transmitted Disease
STI	Sexually Transmitted Infection
SUBEB	State Universal Basic Education Board
ToR	Terms of Reference
WB	World Bank
WHO	World Health Organization

EXECUTIVE SUMMARY

ES1. Background/ Project description

The Federal Government is requesting the support of the World Bank to implement the Adolescent Girls Initiative for Learning and Empowerment (AGILE) Program that aims to address the critical binding constraints adolescent girls face in enrolment, retention, completing secondary school education and empowerment with life skills that are relevant and marketable, in participating states across the country. The project development objective is to improve completion of quality secondary education and comprehensive life-skills training for adolescent girls. The project will be implemented across different States with uneven institutional capacity and weak legislation enforcement, which may pose social and environmental risks in terms of the ability to comply with the requirements of the Nigerian Environmental Guidelines and the World Bank Environmental and Social Framework (ESF). Furthermore, the project will be implemented within complex and varied fragility/conflict contexts potentially posing significant risks to beneficiaries and communities in support of girls education. Thus, this Environmental and Social Management Framework (ESMF) has been prepared as part of project preparatory activities to ensure compliance with the ESF, prior to Board appraisal, since the locations and site-specific activities for the renovation of schools are unknown at this moment.

Objective of the ESMF

The objective of the Environmental and Social Management Framework (ESMF) is to enhance the quality and sustainability of the project, and to ensure that the project follows the World Bank's Environmental and Social Framework (ESF) requirements as well as the Federal Government of Nigeria's environmental policy, laws and regulations. The ESMF has identified the environmental and social risks and impacts of the project, and developed guidelines for assessing, monitoring and mitigating such impacts using the mitigation hierarchy, from activities funded under the project. It also provides guidelines and procedures to be followed in undertaking site-specific Environmental and Social Management Plans (ESMPs) during project implementation phase.

ES 2. Policy, Legal and Institutional Framework

Administrative Framework - In Nigeria, the power of regulation of all environmental matters is vested in the Federal Ministry of Environment (FMENV). There are State Ministries of Environment in all States, Environmental Protection Agencies/Waste Management Authorities in some states, all charged with a responsibility to protect public health and safety, and to restore and enhance environmental quality.

Since the proposed program is domiciled in the education sector, the Federal and State Ministries of Education are critical institutions in this project as they will be the key implementing institutions. In addition, the project centers around adolescent girls, thus, the Federal and State Ministries of Women Affairs are also key collaborators in the project as they provide a framework for Girl child protection.

Relevant Policies, Regulations & Acts - Environmental protection in the country is guided by the National Policy on Environment (revised 2016) which aims to achieve sustainable development in Nigeria. With respect to the proposed development project, the Environmental Impact Assessment (EIA) Act No. 86 of 1992 is one of the most relevant pieces of legislation in Nigeria. The Act makes environmental assessment mandatory for such development project, prescribes the procedures for conducting and reporting EIA studies, and ensures that such projects be screened for their potential impacts.

Other relevant legislation applicable to the project (some of which is not directly relevant to social and environmental impacts but are relevant to the project) includes:

- National Policy on Education 2004
- Workmen Compensation Act 2010
- National Gender Policy 2010
- Land Use Act (1978)
- National Environmental Standards and Regulations Enforcement Agency (NESREA) Act 2007
- Universal Basic Education (UBE) Act 2004
- Child Rights Act (2003)
- National Policy on Inclusive Education in Nigeria (2017)
- National School Health Policy in Nigeria (2006)

Details of the provisions within these legislations applicable to the AGILE Program are provided in chapter two.

These national frameworks are in tandem with the World Bank Environmental and Social Framework (ESF) which sets out the Bank's commitment to sustainable development, through a set of Environmental and Social Standards (ESS). According to the ESF, the project environmental risk rating is moderate because the project proposes to support minor civil works (renovation of schools and classrooms) while the social risk rating is substantial. Where country laws and regulations are inadequate or weak, the ESSs are provided to strengthen the policy gaps for environmental and social sustainability and risk management of World Bank funded projects. The 8 applicable standards to this project include:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS 2: Labor and Working Conditions
- ESS 3: Resource Efficiency and Pollution Prevention
- ESS 4: Community Health and Safety
- ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS 8: Cultural Heritage
- ESS 10: Information Disclosure and Stakeholder Engagement

Details of how these standards apply to the project and how they will be addressed are provided in section 2.7, Table 1.

ES3. Baseline Description of Project Locations

- The Adolescent Girls Initiative for Learning and Empowerment Program will cut across participating states in the country which are not all known at this time of project preparation. However, prevailing deficiencies of the education sector, delivery of quality education and school environment with focus on secondary schools for adolescent girls are presented below:
- **Physical Environment** – poor learning environment, dilapidated and abandoned buildings, poor waste management techniques mostly open dumping and open burning
- **Inadequacy of facilities** - Dilapidated classrooms, damaged roofs, lack of sufficient laboratories and workshop spaces. Available infrastructures and facilities are overstretched, in poor condition and unable to meet the demands of students.
- **Hygiene and sanitation facilities** - Toilets are inadequate in number and type; traditional pit latrines are still being used in many schools with limited access to water supply and has discouraged a lot of adolescent girls from going to school, especially during their monthly menstrual cycle. Absence of sick-bays/clinics in most schools denies these girls the opportunity for proper medical attention which also keeps them out of school.
- **Funding** - Poor funding of the sector leading to low quality of education
- **Poverty** - Unfortunately, due to poverty some parents in the rural areas are not able to send their children to school, rather opt for using their children to hawk especially the Girls to make some money for the family upkeep. In some northern states the girls are put into hawking early, so they begin to save up for their marriage. Across the country, where financial resources are limited parents prioritize boy child education over Girls.
- **Access to secondary schools**- There is also a huge deficit in the number of secondary schools available for these primary school leavers to transit to, and in most cases access students need to travel a distance to access the available secondary schools.
- **Availability and Quality of teachers** - Inadequate number and lack of qualified teachers; teacher to student ratios are very low and grossly inadequate to deliver quality learning. More-so, there are only very few female teachers in Girls schools especially in the rural areas.
- **Socio-cultural norms**: Early marriage and childbearing, high fertility, gender inequality, large family size, less importance placed on Girl child development as opposed to their male counterpart. Age of marriage in the North 13 – 15 years, conversely, in the south early pregnancy is a major impediment to adolescent girl education.
- **Insecurity**: Adolescent girls are more at-risk of molestation, Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA). The rate of kidnapping in girls' school has also become alarming in the northern part of the country, which has further discouraged parents from enrolling their girl child in school.
- **Vulnerability**: Girls with disabilities are usually disadvantaged in accessing education facilities as most schools do not have disable-friendly structures. Girls who have also become internally displaced (IDPs) due to insurgency are also at a disadvantage from limited/lack of access to education.

ES4. Environmental and Social Risks and Impacts

Positive Impacts

The AGILE Program is envisaged to have a wide range of beneficial impacts including:

- Provision of better and more conducive environment for learning from facility renovations and constructions
- Improved health status in schools due to provision of hygiene and sanitation facilities in schools
- Decrease in gender gap in education as more Girls will have access to school and also reduce travel distance
- Marketable skills training will equip Girls with means of income generation, reduce financial dependency and exposure to SEA. They will also be able to assist their families in improving their economic status, and scale up the availability of semi-skills in the State for employment
- Decrease in the rate of early marriage and early pregnancy since more Girls will be engaged in school activities thus reducing idle time. The conditional grants will also provide some form of livelihood support for the Girls thus reducing their dependency for financial support
- Increase in access to good schools nearby will decrease risks of GBV and exposure to sexual exploitation from school trips
- The project will support in encouraging behavioral attitude towards girl child education especially at the community level thus increasing the value and importance of the Girl child
- During construction phase, some construction materials will be sourced from local businesses and stores, some of the locals will also be used as construction workers, food vendors and sellers of other essential commodities will have more business, which will boost income activities in the project locations

Risks and Negative Impacts and Mitigation Measures

The environmental and social impacts identified at this stage are preliminary in nature and will need to be further elaborated in terms of potential (likelihood) for occurrence and severity when the exact locations and sub-projects are known.

Environmental Risks	Mitigation
<ul style="list-style-type: none"> • Risks associated with construction including pollution, waste management, occupational health and safety risks, community health & safety risks, and risks associated with labor influx • Construction and rehabilitation of school classrooms / blocks will imply the generation of debris of various forms such roof tiles, old irons sheets wastes, bricks, stones, cements which will need to be removed and disposed or reused. • Use of and movement of heavy-duty trucks transporting materials such as sand or stone to Construction sites may obstruct traffic flow and cause injury. 	<ul style="list-style-type: none"> • Noise mufflers should be used on noisy equipment • Stockpiles of sand, clay and other materials should be properly covered with trampoline-kind of materials • Vehicles and machinery should be serviced regularly to reduce emissions • Contractors will develop site management plans (including waste management plans) prior to commencement of construction works. • Toilets will be placed at a minimum required distance from water facilities in accordance with WHO guidelines • Emergency Preparedness and Response plans will be prepared as part of the ESMPs and also the contractors management plans

<ul style="list-style-type: none"> • Generation of hazardous waste and risks of toxicity from poor handling and disposal of e-waste materials generated from procured ICT systems • Burning of e-waste and debris as a disposal/management procedure may increase the risk of global warming and climate change • Removal of Natural Vegetation could disturb the natural ecosystem, lead to soil erosion and exacerbate climate change • Excavation may lead to chance find and affect Physical and Cultural Resources • Sourcing of construction materials such as sand, clay, gravels will lead to impacts related to sand mining and extraction of gravel from borrow pits or quarries • Disruption of traffic and public utilities deliveries 	<ul style="list-style-type: none"> • Ensure that constructions/renovations/expansions are not located on steep slopes, landslide or flood prone areas. If projects are located in areas prone to these risks, then proper retaining walls and strengthening of slopes should be done to minimize risks • Vegetation clearance should be limited to required areas (except for clearance of grasses as part of creating a clean environment) • The ESMPs will contain Physical and Cultural Resources Plan/chance Find Procedure • Contractors will prepare borrow pit management plans prior to construction works. • All borrow pits created for the project purpose must be reclaimed to as near as its original state as possible • The PIU should liaise with public utility providers including Ministries of Work/LGA to map locations of public utilities prior to site clearance
<p>Social Risks</p>	<p>Mitigation</p>
<ul style="list-style-type: none"> • Displacement of people (temporary squatters, IDPs, Military) and restriction of access • Facilities may become over-stretched from over-enrolment • Social norm disagreements with the project goals and implementation modalities • Social risks arising from grievances on selection of participants for grants and social norm disagreements with the project objectives • The project may face influx of labor to local communities especially where skilled laborers are not available in some project sites. This could lead to Increase in potential spread of STIs/STDs, HIV/AIDs due to workers on site, increase in GBV/SEA especially for Girls been exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encourage presence of sex workers in the project communities, failure to ensure community participation. • Sexual harassment of female employees for all categories of workers • Under-aged children may be used by contractors as cheap labor • There could also be incidences of forced labor or poor terms and conditions of employment • Grievances could also ensue from unfair treatment of workers • Inadequate resettlement practices for displacements, land acquisitions, livelihoods 	<ul style="list-style-type: none"> • Activities that will involve major land acquisition will not be funded by this project. A stand-alone Resettlement Policy Framework (RPF) has been prepared for this project and Site-specific Resettlement Action Plan (RAPs) will be prepared for sub-projects • Participating schools should identify their growth plans and estimates on capacity of facilities to enrolment ratio and the PIUs should comply with this plan • Use of local labor should be encouraged and this should be done in consultation with the community leaders • All workers should sign Code of Conducts • Sensitization of students and workers on Code of Conduct, prevention of STIs/STDs/GBV/SEA risks by health workers, Women Affairs, relevant NGOs. Stakeholders should be encouraged to report inadequate practices through the GBV-GRM, and these reports should be forwarded to the adequate referral service in line with the project GBV action plan. • The PIUs should monitor compliance with the project Labor Management Procedures • Contractors should be sensitized on the prohibition of use of children as labor and the associated sanctions • Workers Grievance Redress Mechanism (GRM) should be provided in the ESMPs and all workers should be informed of the process • The project should comply with the provisions of the RPF/RAPs, associated grievances should be channeled and addressed through the project GRM.

<p>disturbance, acquisition of borrow pits/ staging areas/ workers campsite could lead to conflicts</p> <ul style="list-style-type: none"> • Vulnerable Groups and people with disabilities may be disadvantaged from gaining from the project • There could be general failure to ensure community buy-in and participation in project implementation which could hamper project sustainability 	<p>Transactional agreement for borrow pit/staging area/workers campsite acquisition/lease should be properly documented and adjudged as fair (by the SPIU social safeguards officers)</p> <ul style="list-style-type: none"> • Building designs should be disable friendly and deliberate attempts at supporting vulnerable groups should be made by the project • There should be adequate consultation with community and school stakeholders to ensure their buy-in and participation.
<p>Occupational and public Health Impact and Safety</p>	<p>Mitigation</p>
<ul style="list-style-type: none"> • Site workers will be exposed to risks of accidental collisions with moving vehicles, strains, and ergonomics from repeated movements or from lifting and heaving of heavy objects, slips and falls. Accidental cuts from tools and machines are also safety risks. • Dust and particulate emissions and welding works from rehabilitation site may cause respiratory and eye impairment health concerns for workers and the public • Movement of trucks carrying sand and materials, lack of road safety may also cause risk of accident, injury and death • Some hazardous materials maybe used during this project and contact with such may pose skin problems or otherwise • Workers may be exposed to insecurity • Grievances may arise from unfair treatment of workers, poor work conditions and poor labor management practices 	<ul style="list-style-type: none"> • Contractors will prepare Occupational Health and Safety Plans in line with the ESHG provided in this ESMF (annex 3) and site specific ESMPs that will be prepared for the sub-projects • The project workers and contractor will abide by the Labor Management Procedures provided for this project • Contractors waste management plans will include handling and management of hazardous waste • Provision and use Personnel Protective Equipment (PPE) by workers will be enforced • First aid will be provided at construction site, staging area and mobile • Provision of potable water, toilets and wash water to the workers • The SPIU will assess living conditions of workers' camps and ensure appropriate living conditions in line with best practices • Contractors will develop and implement drivers training plan in conjunction with Road Safety/ State Traffic Management Agencies • Caution signs and flagmen will be used at strategic locations to provide warning and guidance especially for children crossing • Construction activities can maximize the holiday periods (usually in late March – late April, mid-July – mid September, early December – early January), or after school hours • The PIUs and contractors should collaborate to develop security management plans and liaise with police/ Military where required. • Community leaders should also be used to sensitize their youths to desist from such nefarious activities

Gender-Based Violence (GBV) Risks

GBV risks in the project is substantial due to the nature of the project which is centered around adolescent Girls. This could include public harassment including verbal insults, physical abuse, rape, harmful practices and child trafficking. Specific project GBV exposure may come from the following:

- Having to travel long distances to school exposes the Girls to risks
- Absence of streetlights within schools and around school areas
- Influx of workers to school environment
- Recruitment of male teachers and male staff in the schools
- Lack of awareness on different forms of GBVs and sensitization
- Social norms and beliefs
- Stigmatization of GBV victims
- Conflicts between parents/guardians about the use of funds/conflicting social norms about girls' access to education. In such cases, incidents of interpersonal violence (IPV) such as domestic violence may be exacerbated
- Non-functional referral pathway for GBV victims

A stand-alone GBV assessment is been prepared for the project with defined action plan on mitigating these risks. The Government will include commitments on GBV in the Environmental and Social Commitment Plan (ESCP) and ensure that funds are made available timely for implementation of such action plans. The PIUs will include in the bidding documents ('pre-qualification' and 'employers' requirements') key principles and specific requirements to address GBV to reduce and mitigate the risks of GBV especially during project implementation as explained in section 4.8.4. In addition, female Guidance Counsellors will be provided in every intervention school, they will also be trained on GBV and social management procedures. Safe spaces will also be provided for use as their office

Environmental and Social Management Plan (ESMP)

A detailed Environmental and Social Management plan (ESMP) is presented in section 4.6, table 8 consisting of a set of generic mitigation measures to be adopted by contractors and the SPIU during the implementation and operation of the proposed project to eliminate negative environmental and social impacts, applying the mitigation hierarchy. The plan also contains monitoring indicators and responsibilities and budget. Site-specific ESMPs will be prepared when exact project locations and designs are known.

ES5. Environmental Screening Process

All potential sub-project intervention sites will be screened for Environmental and Social (E&S) impacts prior to approval by the PIU and the Bank. A key objective of environmental screening is to rapidly identify activities under the proposed project that have little or no environmental or social issues so that they can move to implementation in accordance with accordance with the Environmental and Social Standards. The screening will also categorize sub-projects based on inherent environmental and social risks and determine which site-specific instruments (ESMP/RAP) will need to prepare to manage such risks. A generic environmental and social checklist is provided in annex 6, while the screening process is depicted in figure 5.

ES6. ESMF Implementation Arrangement

To ensure that ESF and ESS standards are mainstreamed and effectively managed there will be a dedicated Project Coordinating Unit (PCU) at the Federal Level and State Project Implementation Units (PIU) at the State level for the participating States. Within the Federal PCU and each PIU, there shall be dedicated environmental and social officers. Chapter six defines the roles, responsibilities and institutional arrangements and capacity building plan for the ESMF implementation.

Disclosure

Copies of this ESMF and other E&S instruments like the RPF, SEP, ESMPs that would be prepared for the Project will be made available to the public by the Federal Ministry of Education, as approved by the Federal Ministry of Environment. In line with the Nigeria EIA public notice and review procedures as well as the World Bank Disclosure Policy. Specifically, the publication will be launched for 21 days:

- In 2 National Newspapers and Local newspapers in the participating states
- Radio announcements
- Designated centers at the Federal and State levels including Federal Ministry of Education, Federal Ministry of Environment
- Websites of Federal Ministry of Education, Environment and other relevant MDAs
- World Bank external website

ESMF/ESMP Budget

S/No	Activity	Description	Estimate US (\$)	Estimate Naira(N)
1.	Capacity Building	<p>Training workshops:</p> <p>Average of N1,500,000 per state (cost of hiring expert consultants, venue, refreshment, logistics, training materials etc.)</p> <ul style="list-style-type: none"> ✓ Training for building E&S capacity of SPIU-1 day ✓ Training for MDAs monitoring compliance to mitigation – 1 day ✓ Training for all contractors on HSE, CoC, GRM, C-ESMP – 2 days 	30,000	10,800,000
2.	Awareness creation and Sensitization	<p>Meetings, Workshops and Stakeholder Engagement Meetings:</p> <p>Average of N1,000,000 per state</p> <p><i>Sensitization and awareness programs on health campaigns on STIs/STDs, stakeholder engagement meetings in schools, communities, at state level, mobilizing community-based associations for monitoring</i></p>	19,444	7,000,000
3.	ESMP Mitigation Costs	Implementation of Mitigation measures for E&S Risks:	40,061	14,421,960

		Average of N2,060,280 per state spread across all schools in various locations for environmental and social mitigations		
4.	Monitoring & Compliance for E&S	Monitoring of implementation of mitigation measures by SPIU/MDAs including site visits, logistics Hiring of consultants/ experts to prepare ESMPs/RAPs in the 7 states Disclosure of E&S Instruments for the project <i>Average of N6,000,000 per state</i>	116,666	42,000,000
5.	GRM Implementation Cost	Establishing and operationalizing GRM, GRCs incentives: Purchase and manage complaint boxes, training of GRCs, stipend for GRC members for monitoring and reporting activities, designated phone access, project monitoring of grievance log/compliant boxes (twice weekly) etc. <i>Average of N2,000,000 per state for all sites</i>	38,888	14,000,000
6.	GBV Prevention and Management	GBV Assessment and implementation of GBV Action Plan: Hire GBV expert to map referral services and sensitize stakeholders especially participating schools, capacity building for school Guidance and Counselors on GBV and survivor centered approach	To be captured in stand-alone GBV assessment	
7.	Sub-Total		245,059.9	88,221,564
8.	Contingency	10% of Sub-total	24,505.99	8,822,156.4
Grand Total			269,565.89	97,043,720

The indicative budget for implementing the ESMF/ESMP is Two Hundred and Sixty-Nine Thousand Five Hundred and Sixty-Five Dollars (\$269,565) equivalent estimate of Ninety-Seven Million Forty-Three Thousand, Seven Hundred and Twenty naira only (₦97,043,720), for estimated 7 states participation across all participating schools. It includes cost of mitigation and management, capacity building and strengthening for safeguards, GRM and GBV prevention and management. The details are presented in the table below:

ES7. Summary of Stakeholders Consultations and concerns

Consultations were held with identified stakeholders including:

- Federal Ministry of Education
- Federal Ministry of Health

- Federal Ministry of Women Affairs and Social Development
- State Ministries of Education
- State Universal Basic Education Board (SUBEB)
- State Ministry of Women Affairs
- NIPEP (Federal and State)
- School Management/ Principals
- Students
- School Basic Management Committee (SBMC)
- High Level Women Advocate (HILWA)
- Mothers Association
- Parents Teachers Association (PTA)

Key consultations held are categorised below:

- Consultations with stakeholders in Kano, 23-25 October
- Consultations with stakeholders in Ekiti, 30 October–1 November
- Presentation of the ESMF to stakeholders from Federal Ministry of Education and the Bank’s task team on November 5th at the World Bank Office during the project mission
- Enlarged stakeholder consultation held on 20th November to discuss the identified project risks and mitigation, institutional responsibilities for implementing the ESMF and general E&S procedures

Key Findings

Stakeholders at various levels were largely in support of the project as it will help improve the standard of living and quality of life of adolescent Girls. Key concerns raised by stakeholders included: selection criteria for the participating schools and the beneficiaries of the grants; importance of advocacy and sensitisation campaigns especially amongst religious and traditional leaders; risks to GBV for students; ensuring skills provided to students are relevant to the immediate community and security of students should be ensured, such as through a perimeter fence. Details of consultations are presented in chapter seven of the report.

ES8. Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) will be implemented to ensure that all complaints from local communities are dealt with appropriately, with corrective actions being implemented, and the complainant being informed of the outcome. It will be applied to all complaints from affected parties. The SPIU will maintain a Complaints Database, which will contain all the information on complaints or grievances received from the communities or other stakeholders. This would include: the type of complaint, location, time, actions to address these complaints, and final outcome. The mechanism for implementing the GRM will include:

- Setting up Grievance Redress Committees (GRCs) at the community/school level, State/SPIU level, Federal level and court redress system as a final option
- Complaints boxes located within the school and the community

- Grievance Log to document grievances received and how they were resolved
- Dedicated phone numbers for access to reporting grievances

The project shall ensure that all complaints are listened to in a fair and honest manner and the best course of action identified. Chapter eight defines the GRM framework and procedures to be adopted by the project.

ES9. Labor Management Procedures

The project has developed Labor Management Procedures (LMP) which identifies labor requirements and sets out the procedures for addressing labor conditions and risks associated with the proposed project. Labor influx is likely to aggravate GBV/SEA issues. Contractors must prepare and sign all levels of CoCs requested and present a C-ESMP that specifically addresses the aforementioned. The submission and acceptance of the C-ESMP is a mandatory process, essential prior to the commencement of any form of civil works. The SPIU is responsible for monitoring compliance to the E&S requirements. Further, given that teachers will be recruited for targeted training and support, they should be included in the various categories of direct and indirect staff and workers that fall under the objectives of the LMP.

The LMP is enshrined within the context of the World Bank ESS 2: Labor and Working Conditions. The risks and impact associated with workers as well as community health and safety, and the risk associated with labor impact are moderate due to the nature of minimal construction activities which are well understood and expected to have limited impacts as they can largely be avoided, minimized or managed through procedures set out in the LMP including:

- Adequate documentation of terms and conditions of employment
- Safe work environment, fair pay and rights of association and collective bargaining
- Non-discrimination and equal opportunity
- Prohibition of child labor and forced labor
- Training of all workers on Code of Conduct
- Compliance with National and international occupational health and safety standards

The LMP also requires every employer, including contractors, to have a Formal Grievance Procedure to lodge complaints and receive responses, which should be known and explained to the employees by the contractor and the SPIUs.

ES10. Summary and Recommendation

This ESMF has provided a general view of the environmental and social conditions under which the Project will be implemented. This ESMF addresses the Project's need to monitor and mitigate negative environmental and social risks and impacts of the project and promote sustainability. This report is necessary

at this point of project preparation to inform decision making on project design and modalities for implementation in such a way as to minimize identified risks and negative impacts.

It has been reiterated throughout the report that the project should be designed and implemented in a manner that is disability-friendly and to ensure that vulnerable groups are not placed at more disadvantage as a result of this project.

CHAPTER ONE: INTRODUCTION

1.1 Background Information

The Federal Government of Nigeria (FGN) has realized the importance of education for individual, social and political development. Education plays a key role in national development and is an essential path of a nation's well-being, the FGN has placed high priority on capacity development as a critical means of achieving poverty reduction and has responded to this with policy and sector reforms across the entire education sector and has made significant strides in improving school enrolments to achieve better educational goals. The United Nations' International Conference on Population and Development encouraged governments' world-wide to ensure access to all to education beyond the primary level. Girl-child education has been identified as the backbone of the advanced societies of the world and has huge impact in the Nigerian society and any other society for that matter. Constraints to Girls education differ from one geo-political region to the other but generally include the following:

- Government Policies and Institutional Capacity: Policies on Girl child education are not unified across the country and uneven capacity and weak enforcement remain a challenge
- Socio-cultural norms: early marriage and childbearing, high fertility, gender inequality, large family size, less importance placed on Girl child development as opposed to their male counterpart
- Inclusion: among adolescent girls there exist varied vulnerabilities – for instance, displaced girls, girls living with disabilities, pregnant girls etc. are more vulnerable than others
- Economic Barriers: Cost of schooling, demand for child labor, low financial inclusion among women
- Insecurity: Adolescent girls are more at-risk of molestation, Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA). Insurgency and displacement have also placed affected Girls at a disadvantage from receiving quality education.
- Access: Secondary schools are not easily accessible, and Girls may have to travel long distances to get to school
- Quality: poor learning environment, low quality teaching, low relevant skills (like digital skills, life and livelihood skills).

For Nigeria, a targeted and sustained effort to build human capital, including by ensuring girls from disadvantaged groups enroll and stay in school, will be key to lowering its high fertility and child mortality rates – catalyzing a demographic transition. The reduction in fertility rate will free up resources, allowing the country to increase its investment in the human capital of future generations—providing the basis for sustained economic development. The Government of Nigeria has made strong commitments to increase investments in the human capital development with a strong focus on girls. The ERGP through its investing in people pillar has placed investments in girls as front and center to form the foundation of Nigeria's growth. Some states have now declared free compulsory education (Primary to senior secondary), and the Federal Government has a dedicated National Policy on Gender in Basic Education (2007).

1.2 Assessment of the Education Sector

Adolescent Girls Initiative for Learning and Empowerment Program

In Nigeria boys have had less bottlenecks than girls in accessing formal education due to certain constraints peculiar to the girl child, especially as a result of cultural and social norms that promote gender discrimination and place less emphasis on Girl education and empowerment, early marriage and early pregnancy, weak enforcement of Girl child education policies, poverty and inability to cater for school needs, use of Girls for hawking and other forms of child labor, lack of access to secondary schools amongst others as described in section 3.8.1

The Federal Government is requesting the support of the World Bank to implement the Adolescent Girls Initiative for Learning and Empowerment Program that aims to address the critical binding constraints adolescent girls face in enrolment, retention, completing secondary school education and empowerment with life skills that are relevant and marketable, in participating states across the country. The project cost is estimated at \$500m. The approach will consist of interventions aimed at keeping girls in school and provide opportunities for them to, acquire critical life skills and market relevant skills not currently offered in schools.

1.3.1 Project Development Objectives

To improve completion of quality secondary education and comprehensive life-skills training for adolescent girls. The approach will consist of interventions aimed at keeping girls in school and provide opportunities for them to, acquire critical life skills and market relevant skills not currently offered in schools, the project is structured around four components.

1.3.2 Project Components

COMPONENT/ ACTIVITIES	
	Component 1: Safe accessible learning spaces
1.1	Subcomponent 1.1: Create new learning spaces (Expansion of JSS + SSS + teacher package)
1.2	Subcomponent 1.2: Improve learning conditions (School improvement grants: Rehabilitation of JSS/SSS and school materials)
	Component 2: Enabling Families, communities and schools to support girls' education²
2.1	Subcomponent 2.1. Providing financial support package to families
2.2	Subcomponent 2.2. Community engagement, promoting social and behavioral change
2.3	Subcomponent 2.3 Empowering girls with life skills and digital skills Subcomponent 2.3.a Life-skills training through safe spaces in schools Subcomponent 2.2.b. Pilot innovative approach in the delivery of digital skills to adolescent girls in senior secondary schools
	Component 3: Project management, system strengthening, and learning
3.1	Project management
3.2	System strengthening (All line ministries)
3.3	Learning

1.3.2.1 *Component 1: Safe Accessible Learning Spaces*

Aims to improve completion of quality secondary education for adolescent girls by addressing critical demand and supply constraints

Subcomponent 1.1: Create new learning spaces

(Expansion of JSS + SSS + teacher package)

The component will address access gaps by constructing new schools and renovating or expanding existing schools through Ministry of Education. To improve quality, the component will provide continuous professional development for teachers through colleges of education.

Subcomponent 1.2: Improve learning conditions

(School improvement grants: Rehabilitation of JSS/SSS and school materials)

School grants will be provided to improve learning environment as well as address the school's needs

1.3.2.2 *Component 2: Enabling Families, Communities and Schools to Support Girl's Education*

Subcomponent 2.1. Providing financial support package to families

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

Subcomponent 2.2. Community engagement, Promoting Social and behavioral change

This component will support behavior and social norms change on the value of girls' education and empowerment through media and by engaging traditional and religious leaders to serve as advocates. Traditional and religious leaders will be engaged via the Network of Traditional and Religious Leaders on Keeping Girls in School (KGIS Network). The component will support the formation of Mothers association and boys' clubs to support and monitor school attendance of teachers and students and feed into the School Based Management Committee (SBMC) accountability framework.

Subcomponent 2.3 Empowering girls with life skills and market relevant skills

This component aims to empower and prepare adolescent girls to successfully navigate the different stages of life by equipping them with life skills (negotiation skills, conflict resolution, self-esteem leadership skills, financial literacy and adolescent health and nutrition) etc. It will also provide market-relevant skills training and a graduation grant upon senior secondary school completion. It will be implemented through collaborations with NGOs and private sector.

1.3.2.3 *Component 3: Project Management, System Strengthening, and Learning*

Subcomponent 3.1 Project management

This component is aimed at project implementation and coordination arrangements, monitoring and evaluation at the Federal and State levels

Subcomponent 3.2 System strengthening (All line ministries)

This component aims to provide technical support to Federal and state governments in institutional strengthening, policy review and improve their capacity at the federal, state and local government levels Support will be provided to ensure effective project implementation and coordination, monitoring and evaluation and efficiency in service delivery.

Subcomponent 3.3 Learning

Impact evaluations, studies, pilot programs will be supported to facilitate learning that will enable scale up to other phases of the MPA. Learning will be facilitated from multi-dimensional approaches and allow lessons to be more easily applied to other operations.

1.3.3 Project Target Beneficiaries

The project will be beneficial to the entire country including the education sector and other development sectors such as Health. The primary project beneficiaries are disadvantaged- at risk adolescent girls between 10–20 years old in participating states, indirect project beneficiaries will include boys and communities at large. Specific beneficiaries will include:

- Adolescent girls especially from disadvantaged and poor families
- Secondary schools across the participating states
- Female teachers
- Federal and State Ministries of Education
- State Universal Basic Education Board (SUBEB)
- Families of participating Girls and the host communities
- The project also targets inclusiveness of vulnerable and special needs students

The project will be implemented across different States with uneven institutional capacity and weak legislation enforcement, which may pose social and environmental risks in terms of the ability to comply with the requirements of the Nigerian Environmental Guidelines and the World Bank Environmental and Social Framework (ESF). Thus, this Environmental and Social Management Framework (ESMF) has been prepared as part of project preparatory activities to ensure compliance with the ESF.

1.4 Objectives of the Environmental and Social Management Framework

The objective of the Environmental and Social Management Framework (ESMF) is to enhance the quality and sustainability of the project, and to ensure that the project follows the World Bank's Environmental and Social Framework (ESF) requirements as well as the Federal Government of Nigeria's environmental policy, laws and regulations. The ESMF will identify the environmental and social risks and impacts of the project, and develop guidelines for assessing, monitoring and mitigating such impacts, from activities funded under the project using the mitigation hierarchy. Specific objectives of the ESMF include:

- To ensure the program is carried out in accordance and compliance to Nigerian laws, institutional and regulatory frameworks and the World Bank Environmental Social Standards (ESS);
- To provide a structure/strategy for the integration of social and environmental consideration at all stages of the program planning, design, execution and operation of various sub-projects;
- Determine the training, capacity building and technical assistance scope needed to successfully implement the provisions of the ESMF;
- To establish clear directives and methodologies for site specific instruments including Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management

Plans (ESMPs) that might be required prior to the implementation of specific sub-projects.

1.5 Rationale for the Environmental and Social Management Framework

The proposed project activities are expected to have moderate environmental and substantial social risks, which can be readily mitigated through appropriate measures. However, locations and site-specific activities are not known in detail at this moment. Therefore, the ESMF is the required instrument to be prepared prior to Board appraisal, which will provide a framework for addressing potential risks and impacts of the proposed project, inform design and decision making, provides guidelines and procedures to be followed in undertaking site specific Environmental and Social Management Plans (ESMPs) during project implementation phase.

The ESMF subsequently establishes a unified process for addressing all environmental and social standard issues throughout the different sub-project implementation at project effectiveness. The effective implementation of this ESMF will ensure that both substantive concerns of the required World Bank Environmental and Social Framework and national environmental laws are satisfactorily addressed.

1.6 Scope of Work for Preparation of the ESMF

The scope of work for preparing the ESMF include to:

- Assess the likely environmental and social risks associated with each component and potential subproject, based on a detailed description of the project, its components and the design of specific activities
- Consider and apply relevant World Bank Environmental and Social standards (ESS) proportionate to their risk level in the project
- Compile a summary of key legislative, regulatory and administrative framework, within which the project will operate, provide an overview of the above legislation in relation to the World Bank ESS, and make recommendations to address the gaps with respect to the project
- Conduct field visits to schools in participating states to assess social and environmental site conditions, practices and verify potential risks and impacts
- Establish a clear understanding of the institutional requirements, roles and responsibilities for adopting and implementing the ESMF
- Develop a screening and assessment methodology for potential subprojects, that will include environmental and social performance criteria, allow an environmental / social risk classification and the identification of appropriate safeguards instruments
- identify the required resources and technical assistance to maintain the Client's capacity for the Program duration and beyond. Develop a process (including timeline, budget, organizational requirements, required trainer profiles and expertise) for building and enhancing the capacity of the institutions responsible for implementing the ESMF
- Develop a Grievance Redress Procedure for the project
- Develop Labor Management Procedures and Occupational Health and Safety measures

- Provide Environmental, Social, Health and Safety (ESHS) Guidelines in accordance with the WB requirements.
- Additional stand-alone instruments that will be prepared and disclosed along with the ESMF are: i) Labor Management Procedure (LMP); ii) Stakeholder Engagement Plan (SEP); iii) Resettlement Policy Framework (RPF); iv) GBV Assessment/ Action Plan and v) Environmental & Social Commitment Plan (ESCP). These documents shall be prepared and disclosed locally in line with national extant laws and disclosure procedures, and at World Bank website before project implementation.

1.7 Analysis of ESS and Regulations

Environmental and social risks and impacts related to the proposed project will be managed as per the requirements of the applicable environmental regulations in Nigeria and the World Bank Environmental and Social Standards. The relevance of the ESS to the Adolescent Girls Initiative for Learning and Empowerment Program has been assessed in this ESMF. The ESS also requires compliance to all relevant local, national and international policies and legal requirements.

1.8 Approach and Methodology

The preparation of this ESMF followed a step wise approach that was based on the terms of reference for the consultancy (annex 1) and entailed the following tasks:

1.8.1 Literature Review

Extensive research work, review of relevant policy documents on education at the Federal and state levels including National policy on education, National Gender Policy on education, National Inclusive policy on Education, Special Needs Policy on Education, and other project preparatory documents including the Concept Project Information Document, Project Concept Note and documentations from stakeholder preparatory workshops.

1.8.2 Environmental and Social Baseline Data Analysis

This included field visits to two proposed participating states in different Geo-Political regions: Kano state from 23rd – 25th October, and Ekiti State from 30th October – 1st November 2019. During the visit consultations were held with representatives of the State Ministry of Education, Environment, Finance, NIPEP, Women Affairs, SUBEB, Mothers Association, School Basic Management Committee (SBMC) where relevant state policies were discussed and modalities for implementation of the project. Site visits were also conducted to secondary schools including Girls boarding and day schools, and co-education schools as well. (Detailed consultations reports are contained in chapter 7 while attendance sheets are presented in annex 2 respectively).

Baseline information included environmental and social information relevant to all project components, drawing on existing information from similar Bank projects in Nigeria. The description of the baseline environment was based on the following data:

- Physical environment: the school environment including infrastructure, size, hygiene and sanitation facilities, waste management practices, security structures
- Social environment: legislations, cultural practices and norms, gender concerns and contemporary issues such as GBV/SEA, population, GDP, inflation, income and employment matters, labor management, security etc.

1.8.3 Identification of potential Environmental & Social Impacts and Mitigation Measures

The potential impacts were identified through a review of the proposed project components the anticipated changes that could result in light of the socio-environmental conditions (project-environment interactions). The ESMF presents mitigation measures to either eliminate or minimize adverse environmental and social impacts of specific actions, projects or programs while also enhancing positive effects using the mitigation hierarchy.

1.8.4 Stakeholder Consultations

Consultations with stakeholders at various levels, Federal, State and Local Government, school management, teachers, Girls in school and out of school, formal and informal associations, similar donor funded projects, formed an integral part of executing the assignment (details of consultations are presented in chapter 7). These consultations were useful in articulating stakeholders' perception and concerns about the project and how these concerns can be addressed.

CHAPTER TWO: POLICY LEGAL AND INSTITUTIONAL FRAMEWORK APPLICABLE TO THE PROJECT

2.1 Introduction

This chapter seeks to provide an overview of Nigerian national environmental legislations and policies linking these with other institutional framework policies (, gender, social inclusion), and identifying World Bank Environmental and Social Standards that apply to this project. The chapter further assesses the adequacy of legal and institutional entities in the implementation of this ESMF.

2.2 Policy, Regulatory and Institutional Framework on Environment

2.2.1 National Policy on Environment (Revised 2016)

The National Policy on the Environment aims to achieve sustainable development in Nigeria. The policy identifies key sectors requiring integration of environmental concerns and sustainability with development and presents their specific guidelines, and in particular to:

- Securing quality of environment adequate for good health and well-being;
- Promoting sustainable use of natural resources and the restoration and maintenance of the biological diversity of ecosystems;
- Promoting an understanding of the essential linkages between the environment, social and economic development issues;
- Encouraging individual and community participation in environmental improvement initiatives;
- Raising public awareness and engendering a national culture of environmental preservation; and Building partnership among all stakeholders, including government at all levels, international institutions and governments, non-governmental agencies and communities on environmental matters.

2.2.2 The Federal Ministry of Environment

The Ministry of Environment is the highest policy making body responsible for addressing environmental issues in Nigeria. The act establishing the Ministry places on it the responsibility of ensuring that all development and industry activities, operations and emissions are within limits prescribed in National Guidelines and Standards and comply with relevant regulations for environmental protection management in Nigeria as these may be released by the Ministry. To fulfill this mandate, a number of regulations/instruments are available (See section on National Legal Instruments); however, the main instruments in ensuring that environmental and social issues are mainstreamed into development projects is the Environmental Impact Assessment (EIA) Act No. 86 of 1992.

With this Act, the FMEnv prohibits public and private sectors from embarking on major projects or activities without due consideration, at an early stage, of environmental and social impacts that may arise from the project implementation. The act makes an EIA mandatory for all new major public or private sector projects, including large-scale agricultural projects, and prescribes the procedures for conducting and reporting EIA studies.

2.2.3 National Legal Instruments on the Environment

2.2.3.1 Environmental Impact Assessment Act No. 86, 1992 (FMEnv)

This Act provides guidelines for activities of development projects for which EIA is mandatory in Nigeria. The Act also stipulates the minimum content of an EIA as well as a schedule of projects, which require mandatory EIAs. According to these guidelines:

- I. Category I projects will require a full Environmental Impact Assessment (EIA).
- II. Category II projects may require only a partial EIA, which will focus on mitigation and Environmental planning measures, unless the project is located near an environmentally sensitive area--in which case a full EIA is required.
- III. Category III projects are considered to have “essentially beneficial impacts” on the environment, for which the Federal Ministry of the Environment will prepare an Environmental Impact Statement.

2.2.3.2 National Environmental Standards and Regulations Enforcement Agency (NESREA)

NESREA was established by NESREA Act No 25 of 2007 as a parastatal of the FMEnv. NESREA is charged with the responsibility of enforcing all environmental laws, guidelines, policies, standards and regulations in Nigeria. The Agency also has the responsibility to enforce compliance with provisions of international agreements, protocols, conventions and treaties on the environment to which Nigeria is signatory. It has also amended its established Act of 2007 for a new NESREA Act 2018 to strengthen limiting gaps and enable effective operations.

2.2.3.3 Other Applicable National Legal and Regulatory Instruments on the Environment

REGULATION	DESCRIPTION
The National Guidelines and Standards for Environmental Pollution Control in Nigeria 1991	The regulations provide guidelines for management of pollution control measures.
The Management of Solid and Hazardous Wastes. Regulations 1991	Regulates the collections, treatment and disposal of solid and hazardous wastes from municipal and industrial sources.
National Air Quality Standard Decree No. 59 of 1991	The World Health Organization (WHO) air quality standards were adopted by the then Federal Ministry of Environment (FMEnv) in 1991 as the national standards. These standards define the levels of air pollutants that should not be exceeded in order to protect public health
Urban and Regional Planning Decree No 88 of 1992	Includes planned development of urban areas (to include and manage waste sites)

Harmful Wastes (Special Criminal Provisions etc.) Decree No. 42 1988	Provides the legal framework for the effective control of the disposal of toxic and hazardous waste into any environment within the confines of Nigeria: It deals with the quality of water to be discharged into the environment, sets standards and discharge measures for a wide range of parameters in water discharged from various industries. It also sets out the minimum/maximum limits for parameters in drinking water
National Environmental (Sanitation and Wastes Control) Regulations, 2009	National Environmental (Sanitation and Wastes Control) Regulations, 2009 The purpose of this Regulation is to provide the legal framework for the adoption of sustainable and environment friendly practices in environmental sanitation and waste management to minimize pollution.
National Environmental (Noise Standards and Control) Regulations, 2009.	The objective of the provisions of this Regulation is to ensure tranquility of the human environment or surrounding and their psychological well-being by regulating noise levels.
National Environmental (Surface and Groundwater Quality Control) Regulations, 2010	The purpose of this Regulation is to restore, enhance and preserve the physical, chemical and biological integrity of the nation's surface waters, and to maintain existing water uses.
National Environmental (Construction Sector) Regulations, 2010. S. I. No. 19.	The purpose of this Regulation is to prevent and minimize pollution from construction, decommissioning and demolition activities to the Nigerian Environment.

2.2.4 State Legislation on Environment

The State Ministries of Environment and Environmental Protection Agencies are created to back up the mandates of Federal Ministry of Environment at State levels towards the objective of protecting public health and safety, and to restore and enhance environmental quality and efficient implementation of environmental programs, Therefore, the state Ministries of Environment/EPA give direction to all issues concerning the environment, monitor and control pollution and the disposal of solid, gaseous and liquid wastes generated by various facilities in the states. Some of their functions include:

- Liaising with the Federal Ministry of Environment, to achieve a healthy or better management of the environment via development of National Policy on Environment
- Co-operating with FMENV and other National Directorates/Agencies in the performance of environmental functions including environmental education/awareness to the citizenry
- Responsibility for monitoring waste management standards,
- Responsibility for general environmental matters in the State, and
- Monitoring the implementation of EIA studies and other environmental studies for all development projects in the State. Generally, State laws on environment are still in the evolving stages. Specifically, for EA, the States rely on that of the Federal Government, the EIA Act 86.

2.2.5 State Waste Management Authorities

State waste management authorities have been established across several states in the Country with the following mandate:

- Collection of waste based on the assigned jurisdiction and coverage
- Disposal of waste and in some states recycling of waste
- Management of disposal sites, waste vehicles etc.
- Awareness and sensitization on waste management matters

The capacities of these agencies vary from one state to the other.

2.3 Policy, Regulatory and Institutional Framework on Gender and Child Protection

2.3.1 National Gender Policy (2007)

The National Gender Policy, 2007. Has an overall goal to promote the welfare and rights of Nigerian women and children in all aspects of life: political, social and economic. The goal includes the elimination of cultural/religious gender-based biases and harmful cultural and religious practices which rise to inequalities in gender-role relations in the Nigerian society, by ensuring: ensure equal access to women, boys and girls to both formal and informal education; ensure that women have access to critical resources and invest in their human capital as a means of reducing extreme. The policy seeks to plan, coordinate, implement, monitor and evaluate the development of women in the county. In concrete terms, the National Gender Policy in Nigeria focus on:

- Contribution towards women's empowerment and the eradication of unequal gender power relations in the workplace and economy, in trade unions and in broader society;
- Encouragement of the participation, support and co-operation of men in taking shared responsibility for the elimination of sexism and redefining of oppressive gender roles;
- Increase the participation of women in leadership and decision-making;
- Ensure that through labor legislation and collective bargaining, the particular circumstances of women are considered and that measures are promoted to eliminate discrimination on the basis of gender;
- Ensure that there is a gender perspective in all sectors of development.

2.3.2 Federal Ministry of Women Affairs and Social Development (FMWASD)

The FMWASD was established by Decree No. 30 of 1989. The broad mandate of the Ministry is to advise the government on gender and children issues and issues affecting persons with disabilities and the elderly. The Ministry also initiates policy guidelines and leads the process of ensuring gender equality and mainstreaming at both the national and international levels.

2.3.3 The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984)

Discourages the discrimination against women by any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or

exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.

2.3.4 Child Rights Act (2003)

The act gives full protection to privacy, honor, reputation, health and prevention from indecent and inhuman treatment through sexual exploitation, drug abuse, child labor, torture, maltreatment and neglect to a Nigerian Child. It also declares that every child has a right to life, to be allowed to survive and develop. It also codifies the rights of children in Nigeria (a person below the age of 18 years), consolidates all laws relating to children into a single law and specifies the duties and obligations of government, parents and other authorities, organizations and bodies. More particularly, the Act gives full protection to privacy, honor, reputation, health and prevention from indecent and inhuman treatment through sexual exploitation, drug abuse, child labor, torture, maltreatment and neglect to a Nigerian Child.

OCCUPATIONAL HEALTH AND SAFETY FRAMEWORK

2.4 Policy, Regulatory and Institutional Framework on Occupational Health and Safety

2.4.1 Labor Act, Chapter 198, Laws of the Federation of Nigeria (LFN) 2004

The Act covers general provisions including:

- Protection of wages
- Contracts of employment and terms and conditions of employment
- Fair treatment and equal opportunities of project workers.
- Hours of work and overtime
- Employment of women
- Labor health matters
- Prohibition of forced labor
- Labor complaints

2.4.2 Factories Act, 1990

The Factories decree 1990 is a landmark in legislation in occupational health in Nigeria. It provides a substantial revision of the colonial legislation, Factories Act 1958, in which the definition of a factory was changed from an enterprise with 10 or more workers to a premise with one or more workers thereby providing oversight for the numerous small-scale enterprises that engage the majority of the workforce in Nigeria. It stipulates the enforcement of compliance on factories, industries and organizations that employ labor on the protection of the right of workers to friendly environment, health and safety.

2.4.3 Factories Act, Cap F1, LFN 2004

- Provides a legal framework for the regulation of safety standards for the operation of factories in Nigeria; and
- Sets out minimum standards for clean and conducive working environments

2.4.4 Worker's Compensation Act (2010)

The Act provides compensation to employees who suffer from occupational diseases or sustain injuries arising from accidents at workplace or in the course of employment. Payment of compensation (to the worker or to his dependents in case of death) by the employer is rooted in the accepted principle that the employer has a duty of care to protect the health, welfare and safety of workers at work.

2.4.5 Federal Ministry of Labor & Employment

The Nigeria Ministry of Labor and Employment is the country's designated authority for labor-related matters. The ministry has the authority and capacity to ensure appropriate labor management in the country. The Ministry is structured into six Zonal labor offices, nine departments consisting of six professional and three service departments. It operates 36 State Labor Offices and the FCT, 23 District Labor Offices, Labor Desk Office, Geneva, Switzerland. Recently nine (9) Labor Desk were approved for nine ministries, department and agencies.

WORLD BANK ENVIRONMENTAL AND SOCIAL FRAMEWORK

2.5 World Bank Environmental and Social Framework

The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support this project, with the aim of ending extreme poverty and promoting shared prosperity. According to the ESF, the applicable Environmental and Social Standards (ESS) to the project has been discussed in 2.7 below.

2.6 Environmental and Social Standards (ESS)

The ESSs set out the requirements relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. Where country laws and regulations are inadequate or weak, the ESSs are provided to strengthen the policy gaps for environmental and social sustainability and risk management of World Bank funded projects. The application of these standards, by focusing on the identification and management of environmental and social risks, will support the project in a sustainable manner for the benefit of the environment and their citizens. According to the ESF, the project environmental risk rating is moderate because the project proposes to support minor civil works (renovation of schools and classrooms) while the social risk rating is substantial. There are 8 applicable standards to the proposed project which include:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS 2: Labor and Working Conditions;
- ESS 3: Resource Efficiency and Pollution Prevention;
- ESS 4: Community Health and Safety;
- ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

- ESS 8: Cultural Heritage
- ESS 10: Information Disclosure and Stakeholder Engagement

The applicability of these standards to the project is discussed in table 1 below:

Table 1: Environmental and Social Standard Applicable to the Project

Applicable Standard	Reason for Application of Standard to the Project	How it will be addressed by the project
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	<p>Proposed project activities under component 1 will include minor infrastructure works in the selected schools to include rehabilitation of existing classrooms, construction of new classrooms, replacement of roofs, windows, provision of hygiene & sanitation facilities. Skills centers may also be established with modern equipment, procurement of laboratory equipment, chemicals, electronic equipment. Environmental concerns associated with such construction works include waste generation, debris from rehabilitation activities, community health and safety, occupational health and safety of workers, noise, dust emissions etc. However, these impacts are limited, site specific and can be mitigated.</p> <p>The project also poses some social risks as explained in chapter 5 including risks associated with labor influx, grievances, social conflicts and exclusion of vulnerable groups from operationalizing the project.</p>	<p>This standard requires environmental assessment (EA) of projects/investments proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus improve decision making.</p> <p>Given that the exact project locations are not fully known at this stage, this ESMF, an Environmental and Social Commitment Plan (ESCP) outlining Government's commitment, and the Stakeholder Engagement Plan (SEP) will be prepared prior to board appraisal. A stand-alone GBV assessment may also be required for the project.</p> <p>Site-specific Environmental and Social Management Plans (ESMPS) and other required site-specific plans like waste management plan, OHS plan etc. will be prepared when project locations are known.</p>
ESS 2: Labor and Working Conditions	The project will make use of various categories of workers, direct and indirect workers who may face unfavorable terms and conditions of employment, discrimination, child labor, forced labor, grievances and unsafe working conditions.	Labor Management Procedures (LMP) consistent with ESS2 and National Labor Laws for all categories of workers has been integrated in the ESMF in chapter 9 and a stand-alone LMP has been prepared. A generic OHS plan is also presented in annex 4, while specific OHS Plans will be prepared as part of the site-specific ESMPS.
ESS 3: Resource Efficiency and Pollution Prevention;	Proposed construction may lead to air, water and land pollution from emissions, waste generation, use of resources etc. if not properly managed. Inefficient use of resources like water and energy, use of environmentally un-friendly techniques during construction and operation could also pose risks. Increased use of fuel-wood for cooking from increased student's enrolment leading to deforestation and climate change, if there is no switch to environmentally friendly cook stoves.	This ESMF identifies environmentally friendly options to project activities in the mitigation measures in section 4.6 of this ESMF. Site specific ESMPS and contractors waste management plans to be prepared will include mitigation measures to minimize and manage the risks and impacts associated with resource efficiency and pollution management.
ESS 4: Community Health and Safety	Schools and project communities may be exposed to risks from project activities during pre-construction, construction, operation phases	Site-specific ESMPS will assess this risk and provide mitigation measures.

	<p>including accidents/incidents, pollution, increase in spread of diseases, GBV/SEA, borrow pits etc. There is also a risk that project construction may be on erosion/flood prone areas.</p>	<p>A stand-alone GBV assessment and action plan may also be required for the project. An Environmental, Health & Safety Guidelines (EHSG) applicable to the project is presented in annex 3 in line with the World Bank guidelines.</p>
<p>ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</p>	<p>The project is not planning to finance activities that will involve land acquisition, restrictions on land use, or involuntary resettlement. However, risks may come from possibility of temporary squatters like IDPs, Military in abandoned schools selected for renovation, expansion of school facilities, repair of staff quarters may affect people using the facilities temporarily, erection of perimeter fence may affect people crops, illegal structures or easement. However, these impacts are expected to be limited and site specific.</p>	<p>This standard will be addressed in the stand-alone Resettlement Policy Framework (RPF) been prepared alongside this ESMF.</p> <p>Site-specific Resettlement Action Plans (RAPs) will be prepared as required when project locations are known based on screening of such sites.</p>
<p>ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>	<p>Potential environmental risks and impacts associated with this ESS will be limited. Potential risks could arise if there are rivers, floodplains, wetlands and other fragile ecological systems near the selected schools. Vegetation clearing could disturb flora and fauna. Increased demand for fuel-wood for cooking from increased students' enrolment will lead to more logging and deforestation if there is no switch to environmentally friendly cook stoves. Primary suppliers could source furnishing materials from reserved areas.</p>	<p>The ESMF will provide guidance on screening and mitigation measures to ensure that project activities do not alter or cause destruction of any critical or sensitive natural habitats.</p> <p>Site specific ESMPs will contain mitigation measures to address these risks</p>
<p>ESS8: Cultural Heritage</p>	<p>Project activities are not envisaged to pose risks to cultural heritage since they will occur within the confines of schools. However, excavation and other project activities may lead to encounter of physical and cultural resources.</p>	<p>Physical and Cultural Resource Plan (PCR)/ Chance Find Procedures will be contained in the site-specific ESMPs.</p>
<p>ESS 10: Information Disclosure and Stakeholder Engagement</p>	<p>There are different categories of stakeholders associated with the project with varying degree of influence. These stakeholders will need to be identified, engaged effectively in order to improve environmental and social sustainability of the project, enhance acceptance, and make significant contribution to successful project design and implementation.</p>	<p>A Stakeholder Engagement Plan (SEP) is been prepared as a stand-alone document which will be disclosed prior to board appraisal</p>

2.7 Comparison between Nigeria EIA Guidelines and World Bank ESF

The Environmental Impact Assessment Act No. 86 of 1992 requires that development projects be screened for their potential impact. Based on the screening, a full, partial, or no Environmental impact assessment may be required. The World Bank ESF though similar in certain aspects, gaps still exist. Some of the gaps include emerging issues on climate change, Gender Based Violence (GBV), identification and early consultation with stakeholders; Community Health and Safety etc.

Table 2A: Gaps between the Environmental Impact Assessment (EIA) Act 86, 1992 and the Environmental and Social Framework (ESF)

Context	ESF	Environmental Impact Assessment (EIA) Act 86, 1992	GAPs
Risk Classification	High, Substantial, Moderate Risk and low	Categories I, II & III	Criteria for screening differ but similar
	ESS1 Assessment and Management of Environmental and Social Risks and Impacts	Environmental Impact Assessment Act, No. 86 1992 (EIA).	EIA regulatory framework aligns well with the basic ESF Principles. However, ESF has additional requirements on assessment of associated facilities, climate change issues, gender, more extensive consultation, more intensive assessment of health issues etc.
	ESS 2 Labor and Working Condition	Labor Act, Chapter 198, Laws of the Federation of Nigeria (LFN) 2004, on promoting fair treatment and equal opportunities of project workers. Child Labor Act. 2019 prohibit child labor or their engagement under certain conditions	Gaps include emerging issues on contractor's requirement in the bidding documents. separate requirements for direct workers, contracted workers, primary supply workers, and community workers. The ESF places responsibility on the proponent (borrower) to take responsibility for ensuring requirements for managing the 4 categories implemented. While the Labor Act. places responsibility only for direct workers (permanent or casual) employed within or outside the community. The child labor Act. 2019 essentially satisfy requirements of ILO on child labor and consistent with ESS 2
	ESS3 Resource Efficiency and Pollution Prevention and Management	Environmental Impact Assessment (Act 86, 1992) to avoid or minimize waste generation and ensure effective management to avoid, minimis or mitigate adverse impacts on human	Requirements for pollution prevention and waste management are similar, but the ESF contain additional requirements for improving efficient consumption of energy, water and raw materials, as well as other resources

Context	ESF	Environmental Impact Assessment (EIA) Act 86, 1992	GAPs
		health and the environment. National Environmental Regulations has requirements for pollution prevention, discharge permits, etc.	
	ESS4 Community Health and Safety	Nil	Other frameworks such as the Petroleum Act, Cap P10, LFN 2004, Quarantine Act, Cap Q2, LFN 204 provide for issues on ESS4 Community Health and Safety, however, these issues are not adequately covered in the EIA Act 86, 1992, and not often comprehensively assessed because the fragmentation of requirements into various laws
	ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Nil	Chapter 202 of Nigeria Land Use Act, 1990 is the legal basis for land acquisition and resettlement in Nigeria. However, the issues on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement are not adequately covered in the EIA ACT 86, 1992
	ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	Nil	Although provided for in the Endangered Species Act, Cap E9, LFN 2004. Gaps exist in the EIA Act 86, 1992 on issues on biodiversity and climate change.
	ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Nil	The provision for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are not provided for in the EIA Act 86, 1992.
	ESS8 Cultural Heritage	Nil	The issue on Cultural Heritage is not provided for in the EIA. However, the FGN established the National Endowment for The Arts Act to foster understanding amongst cultural organizations in order to strengthen cultural ties. National Commission for Museums and Monuments has responsibility of physical cultural properties
	ESS9 Financial Intermediaries	Nil	The EIA Act 86, 1992, did not provide for Financial Intermediaries.

Context	ESF	Environmental Impact Assessment (EIA) Act 86, 1992	GAPs
	<p>ESS10 Stakeholder Engagement and Information Disclosure</p>	<p>EIA Act, No. 86 1992 requires consultation of affected people, State or Local Government of the proposed activity, contains requirements for public disclosure of reports</p>	<p>Gaps include guidelines on the; the identification of stakeholders and focused groups including the preparation of stakeholders' engagement plans and Grievance Redress Mechanisms, and entrenches stakeholder engagement throughout the life cycle of the project</p>

Table 2B: Gap Analysis: Land Use Act Vs World Bank ESS5

Type of property	National Legislation	ESS5	GAP between National Legislation and ESS5
	COMPENSATION		
Lands	Land Use Act (LUA) 1978 - alternative land can be allocated by the issuing authority for the same purpose based upon the rights held upon such land.	Compensations in kind are recommended. Assistance should be provided for the restoration of productivity and achieving production levels (at least equivalent to the land replaced). The cash compensation is possible if the affected lands account for less than 20% of the household's land.	ESS5 prefer compensation in kind, while LUA favors cash ESS5 recognizes payment for land, while the LUA Act does not (because it is owned by Government for common public good)
Buildings (houses, annexes and other affected property)	Land Use Act 1978 -Cash compensation for improvements based upon market value.	Compensations in kind are recommended. Compensation should be based on the present value of depreciation, as well as all transaction costs (taxes, permits, etc.).	LUA Compensation valuation is based on depreciated unexhausted value, while ESS5 is based on replacement value
Crops	Land Use Act 1978 - the holder and the occupier shall be entitled to compensation for the value at the date of revocation of their unexhausted improvements which includes crops and trees	For perennial crops, compensation shall consider the production delivery time. For annual crops, the land offered as compensation allows the restoration of production.	Harmonized compensation rates for crops does not consider land restoration and value loss for crops to achieve same production levels as required by ESS5
Economic Impact	NIL	Resettlement program that allows the owner to gain full trade income flow.	LUA does not consider economic loss due to business relocation or even closure
Assistance to resettled PAPs	NIL	PAPs should, in addition to the relocation allowance, receive assistance in their resettlement and monitoring thereafter.	LUA does not have specific provisions to cover assistance (relocation logistics and convenience)
Illegal occupants/ Squatters	LUA does not have provisions for squatters	Relocation assistance and compensation for lost of assets (other than land).	ESS 5 recognizes the right of squatters to assistance to relocate

Type of property	National Legislation	ESS5	GAP between National Legislation and ESS5
Tenants	Entitled to compensation based on the amount of rights they hold upon land.	They must be compensated, whatever the type of legal recognition of their land tenure (formal or informal).	No difference

The Adolescent Girls Initiative for Learning and Empowerment Program is an Education sector project and the risks are not envisaged to be high. Based on the ESF, the environmental risk rating is **moderate** because the project proposes to support minor civil works under component 1, while the social risk rating is **substantial** because the project deals with adolescent Girls (a vulnerable category) and other related social risks related risks include, conflict/fragility, SEA/GBV and communal conflicts related to social norm campaigns. However, due to the adaptable nature of the ESF, these ratings will continue to be reviewed and classified as the project progresses due to, identification of sites, evident changes, increased capacity of the Government, institutional support structures, unforeseen events and emergencies. Accordingly reviews and updates will be made to the Environmental and Social Commitment Plan (ESCP), Labor Management Procedure (LMP), Stakeholder Engagement Plan (SEP) and other necessary instruments.

2.8 Assessment of the Policy and Regulatory Framework for Environmental & Social Concerns

Generally, with regards to environmental and social management issues, legislation is in a continuing process of development in Nigeria. The ESF promotes the use of country systems in managing environmental and social risks associated with projects, and when this capacity is judged to be insufficient, the Bank will agree with the borrower the steps required to strengthen the identified gaps while the ESS provides support to guide the project. An assessment of the adequacy of the environmental and social framework to guide the project is provided in Table 3 below including identified gaps and capacity strengthening options. This section has been guided by the rapid assessment of Nigeria's capacity to implement the 10 ESSs undertaken by the World Bank in early 2019 and is also based on the outcome of review of policy documents and stakeholder consultations.

Table 2: Gaps between the relevant ESF and the EIA including the Assessment of the Government’s Policy and Regulatory Framework to address the E&S Risks of the Project

E&S Concern	Gaps in the National and Sub-National Framework and the ESF	Capacity Strengthening Options	Synergy and Support from the ESS
<p>ESS1: Assessment and Management of Environmental and Social Risks and Impacts</p>	<p>Environment Sector</p> <ul style="list-style-type: none"> • The EIA Act and guidelines lack detailed coverage of key ESS issues, particularly regarding social risks and impacts • Implementation and enforcement of the laws and policies is a major challenge due to lack of adequate skilled manpower to handle ESS procedures, limited skillset, manpower and capacity in the FMEEnv. • The capacity of the state’s ministries of environment is also limited based on lack of awareness of these laws, sub-standard organization, e.g., some do not have EA departments, limited funding, lack of monitoring tools. 	<ul style="list-style-type: none"> • The national policies and guidelines will need to emphasize emerging social risks like gender, GBV, workers safety, grievance redress etc. and emerging environmental concerns like climate change • These polices need to be effectively domesticated at the sub-national levels with a lot of awareness provided • Trainings on addressing E&S risks and impacts will need to be organized at the Federal level and in the project participating states for the institutions concerned implementing the ESMF, ESCP, ESMPs, LMP, GRM, GBV Action Plans (as captured in the training plan table 10) • The project can promote better synergy between the Federal and State Ministries of Woman Affairs and the Gender functions in the Federal and State Ministries of Education/SUBEB through policy harmonization and capacity building 	<ul style="list-style-type: none"> • An ESMF will be prepared early on to: <ul style="list-style-type: none"> ✓ identify environmental and social risks associated with the project and how they can be mitigated by planning, design and decision-making options ✓ define a screening process for sub-projects E&S risks ✓ identify capacity strengthening options for institutions responsible for managing the E&S risks. ✓ Inform design decisions based on E&S risks and international best practices • An Environmental and Social Commitment Plan (ESCP) outlining Government’s commitment, and Stakeholder Engagement Plan (SEP) will be prepared prior to board appraisal and will be reviewed as the project progresses • A stand-alone GBV assessment may also be required for the project. • Site-specific Environmental and Social Management Plans (ESMPs) and other required site-specific plans like waste management plan, OHS plan etc. will be prepared when project locations are known.
	<p>Education Sector</p> <ul style="list-style-type: none"> • Weak enforcement of the educational policies across the states • There is also no synergy in the domestication of these policies as different states are guided by varying policies especially with respect to free education, Girl child education and child protection laws. • Lack of Government buy-in and capacity to support some of these policies • Some states are also in the process of establishing some of these policies that guide Girl child education • Some sector related policies do not conform with international best practice e.g. ratio of 1: 	<ul style="list-style-type: none"> • The project can support the review and roll out of some of these policies at the state level • Support better synergy of these policies in the participating states with respect to geographical peculiarities • Support sensitization and awareness campaigns of these policies and on Girl child education • Promote coordination in the roles of participating institutions in the project through capacity building • Support move to align with international best practices • Identify and support existing non-formal structures with defined roles & responsibilities in the project, incentives, monitoring tools etc. These institutions will be key to determine the success of this project 	

	40 students for toilet facility against the international standard of 1:20 Girls		
ESS2: Labor and Working Conditions	<ul style="list-style-type: none"> National legal framework is robust and implemented well in the formal sector; however, casual workers are not given the same benefits (such as compensation for injuries, right to belong to trade unions and bargain collectively, various social security benefit, unequal pay, forced labor, absence of grievance redress mechanism). There is no defined labor management procedure to guide developmental projects. Lack of synergy between FMEnv and Ministry of Labor limits the efficiency and effectiveness of labor inspections on projects. Low resources, capacity, standardized tools for effective implementation and monitoring of OHS standards 	<ul style="list-style-type: none"> The project can create a platform for discussion amongst the FMEnv, Ministry of Labor, State Ministries of Environment and Labor management functions for effective coordination of their roles with respect to workers safety and protection in the project, as documented in the institutional roles and responsibilities for implementation of the ESMF (table 9), the project Labor Management Procedures (LMP) and subsequent ESMPs that will be prepared. Assist in capacity building for labor management based on international best practice (ILO, WB standards etc.) and provision of monitoring tools and framework for effective implementation under this project 	<ul style="list-style-type: none"> The ESCP includes Government's commitment to issues relating to labor and working conditions. Labor Management Procedures (LMP) consistent with World Bank ESS2 and National Labor Laws for all categories of workers have been integrated in the ESMF. In addition, a stand-alone LMP including a grievance mechanism for labor disputes has been developed. A generic OHS plan is also presented in annex 4, while specific OHS Plans will be prepared as part of the site-specific ESMPs for the sub-projects
ESS3: Resource Efficiency and Pollution Prevention and Management	<ul style="list-style-type: none"> Existing legal framework to promote environmental stewardship, including efficient energy management, water resources conservation and cleaner production, however these have not been successfully domesticated at the sub-national levels and general awareness of these regulations are low. Overlapping mandates amongst ministries of environment, EPAs, waste management institutions, NESREA creates weak cooperation and implementation. Weak enforcement capacity due to inadequate human, material resources, low funding Absence of strong sanctions for defaulters 	<ul style="list-style-type: none"> Promote awareness on environmental guidelines to participating institutions both formal and non-formal under the project in the participating states through symposiums, Instructional Educational (IEC) Materials Strengthen the relevant state functions through restructuring, definition of roles and responsibilities for each player and capacity building for implementing the ESMF (see table 10) and subsequent ESMPs. The Project Implementation Units (PIU) will need to liaise with relevant agencies to ensure the project incorporates best practices & technologies in designs and equipment to be used/supported under this project 	<ul style="list-style-type: none"> The ESCP includes Governments commitment to issues relating to resource efficiency and pollution management. This ESMF identifies environmentally friendly options to project activities in the mitigation measures in section 4.6. Site specific ESMPs and contractors waste management plans to be prepared will include mitigation measures to minimize and manage the risks and impacts associated with resource efficiency and pollution management.
ESS4: Community Health and Safety	<ul style="list-style-type: none"> There are general provisions within legal frameworks that protect the public from harm and respond to emergencies including police, NEMA, NSCDC, Traffic Management 	<p>Roles in managing community health and safety risks need to be properly defined for formal and non-formal institutions/groups participating in the project especially at the community and school levels</p>	<ul style="list-style-type: none"> Site-specific ESMPs will assess this risk and provide mitigation measures, and assign responsibilities for actions during all phases of the project (pre-construction, construction and operational phase

	<p>Agencies, LGAs, NGOs, CBOs, however, their efforts are usually not coordinated and thus results are obtained in silos.</p> <ul style="list-style-type: none"> • Lack of maintenance of public infrastructure (including buildings, water facilities etc.) during the operation phase of development projects exacerbate safety risks • Poor monitoring, evaluation and reporting framework on community health and safety 		<ul style="list-style-type: none"> • A stand-alone GBV assessment and action plan may also be required for the project. • An EHSG applicable to the project is presented in annex 3 in line with the World Bank guidelines
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	<ul style="list-style-type: none"> • There is no requirement in the Land Use Act to develop resettlement actions plans, inclusive stakeholder consultation, or GRM • Compensation is limited to crops and improvements on land, often using rates that are out-of-date and not aligned with market value, and does not factor the interest of land tenants • The Land Use Act does not consider restrictions to access to livelihood sources, vulnerable groups, other community resources • No measures to ensure that the affected people are offered support for a reasonable transition period 	<ul style="list-style-type: none"> • The various PIUs will have to synergize with the Ministries/Bureau of Lands in the participating states to sensitize them on the World Bank Requirements on ESS5 (according to the training plan in the Resettlement Policy Framework) • The Government can leverage on the support of the project to update compensation rates to current market rates and this can be adopted state-wide and for any developmental purposes 	<ul style="list-style-type: none"> • A stand-alone Resettlement Policy Framework (RPF) is being developed for the project which sets out guidelines to be adopted by Government concerning issues of Land Acquisition, Restrictions on Land Use and Involuntary Resettlement in accordance with the ESF • Resettlement Action Plans (RAPs) will also be prepared when project specific locations and designs are known
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	<ul style="list-style-type: none"> • There are good regulatory frameworks, but with weak implementation and enforcement capacity especially at the grassroot levels, • Lack of awareness on such frameworks especially at the sub-national level • Duplication of functions amongst various MDAs like EPAs, State Ministries of Environment, NESREA etc. leads to lack of synergy 	<ul style="list-style-type: none"> • Promote awareness on regulatory framework in the participating states through symposiums, Instructional Educational (IEC) Materials • Strengthen the relevant state functions through restructuring, definition of roles and responsibilities for each player and capacity building for implementing the ESMF and subsequent ESMPs. 	<ul style="list-style-type: none"> • The ESMF will provide guidance on screening and mitigation measures to ensure that project activities do not alter or cause destruction of any critical or sensitive natural habitats. • Site specific ESMPs will contain mitigation measures to address these risks • The ESF also provides that Primary Suppliers should be audited to ensure compliance with environmental regulations (this is captured in the mitigation section)
ESS8: Cultural Heritage	<ul style="list-style-type: none"> • Environmental policies do not cover the assessments of risks and impacts on cultural heritage • The Federal Ministry of Information and Culture focus more on the promotion of festivals as against the protection of community culture and heritage 	<p>The PIUs will need to liaise with the responsible ministries for cultural heritage in the State to discuss the procedures to adopt in line with the World Bank requirements which will be documented in the ESMPs</p>	<p>Physical and Cultural Resource Plan (PCR)/ Chance Find Procedures will be contained in the site-specific ESMPs.</p>

	<ul style="list-style-type: none"> Poor knowledge, skillsets and expertise to implement ESS8 requirements, including the preparation of Cultural Heritage Management Plans 		
ESS10: Stakeholder Engagement and Information Disclosure	Stakeholder consultations are not usually considered as a critical component of development projects, and stakeholders' input are usually not considered in project design which leads to low accountability and unsustainable projects after implementation.	<ul style="list-style-type: none"> Stakeholder identification and mapping should be carried out early in the project and updated during the course of project implementation. Stakeholders at various levels should be trained on the provisions of the Stakeholders Engagement Plan (SEP). 	A Stakeholder Engagement Plan (SEP) has been prepared as a stand-alone document which will be disclosed prior to board appraisal.

CHAPTER THREE: EDUCATION SECTOR OVERVIEW

Education is administered by the federal, state and local governments. The Federal Ministry of Education is responsible for overall policy formation and ensuring quality control but is primarily involved with tertiary education. School education is largely the responsibility of state (secondary) and local (elementary) governments. Nigeria's education system encompasses three different sectors: basic education (nine years), post-basic/senior secondary education (three years), and tertiary education (four to six years, depending on the program of study).

3.1 Educational Delivery System

The formal education system is delivered through a number of institutions ranging from Early Childhood and Care Development (ECCD) classes, mostly attached to primary school settings or provided by partners in the private sector, through primary and junior secondary schools (under universal basic education provision), senior secondary schools to universities, colleges of education and polytechnics. Literacy and non-formal education are provided by various organizations, including Mass Literacy Agency, NGOs and religious denominations. In general, the quality of education is low based on weak indicators for levels of learning achievement.

3.2 Baseline Description of the Project Locations

The Adolescent Girls Initiative for Learning and Empowerment Program will cut across participating states in the country which are not all known for certainty at this time of project preparatory, however, this section presents description of prevailing deficiencies of the education sector, delivery of quality education and the school environment with focus on secondary schools. Some information was also gathered from field visitations made to Ekiti and Kano states, and visits to some schools as mentioned earlier, and information shared from visits of other teams as part of project preparatory activities. Some of these challenges include:

- **Funding:**
Poor funding of the sector leading to low quality of education; annual budgetary allocation of 7.04% in 2018 which is lower than the allocated 7.4% in 2017, and still a far cry from the UN recommended 26%. Unfortunately, due to poverty some parents in the rural areas are not able to send their children to school; even when school fees are free, provision of uniforms, books, bags, transportation, food is a problem. Thus, these parents opt for using their children to hawk and make some money for the family upkeep.
- **Access:**
There has been a general increase in physical access to educational provisions for basic and senior secondary levels and UBE schools (primary and JSS) and increase enrolments. However, current provisions are inadequate in terms of number of schools available to the school age population. There is also a huge deficit in the number of secondary schools available for these primary school leavers to transit to, and in most cases access students need to travel a distance to access the available secondary schools.

- **Availability and Quality of teachers:**

Inadequate number and lack of qualified teachers; teacher to student ratios are very low and grossly inadequate to deliver quality learning. There are some challenges relating to teachers' recruitment, deployment, training, and accountability. There are disparities across urban and rural schools in teacher deployment, with schools in the rural areas still facing shortage of teachers. Teacher pay is low and often late, reducing the incentives for teachers to perform and be accountable for student learning outcomes (SDI-Nigeria, 2013). There are notable similar support programs across the states addressing some of these issues including (Nigeria Partnership for Education Project (NIPEP), State Education Program Investment Project (SEPIP), the Adolescent Girls Initiative for Learning and Empowerment Program can key into and add to the successes of such projects.

- **Physical Environment:**

Poor learning environment including untidy environment with uncut grasses especially in Girls only schools and poor waste management techniques including open dumping and open burning of waste. While most schools seem to have a defined/planned layout, there are dilapidated and abandoned buildings that may require demolition, in addition to those in dire need of rehabilitation. Some school facilities are located in areas prone to erosion which could lead to building collapse and future hazards.

- **Inadequacy of facilities:**

- Dilapidated classrooms, damaged roofs, lack of sufficient laboratories and workshop spaces. Available infrastructures and facilities are overstretched, in poor condition and unable to meet the demands of students.
- Abandoned buildings are also a major challenge in many schools
- In some schools there are no chairs and tables for students to receive lectures, hence they sit on the floor.
- Staff rooms and staff quarters are also grossly inadequate.
- Perimeter fence was available in few schools but most of them do not have fence thus exposing the school to unauthorized access, encroachment and physical danger
- Kitchen facilities make use of firewood as source of fuel thereby causing emissions and public health hazards

- **Hygiene and sanitation facilities:**

- Toilets are inadequate in number and type; traditional pit latrines are still been used in many schools.
- The toilets are usually located in remote and poorly accessible areas in the schools and doors are always open because the closing handles broke down.
- Cleaning of the toilets floor is problematic due to the lack of soap or detergents
- Water supply is inadequate and many of the toilets did not have any attached water source. Toilet papers and hand-washing facilities for students and teachers are not provided in many schools.




- In some schools, girls are taught to wrap their used sanitary pads in nylons and dump in area designated for waste burning. While some dump the pads into the toilet for lack of better options, which leads to blockage and quick fill of the sewage and need for evacuation.
- Evacuation of toilets is usually done by informal sanitation waste collectors with drums on wheel-barrows and the sewerage is dumped or utilized by the locals as manure
- Schools use boreholes as the main source of water and most schools have only 1 or 2 functional boreholes.
- **Basic Amenities:**
 - Electricity is almost not available in the school and even if available it is often sporadic.
 - Most of the schools do not have sick-bays/clinics, untrained medical staff usually administer medication to students.
- **Study Materials, Equipment and Technology:**
 - Lack of sufficient textbooks for students to use and absence of well-furnished libraries to cater for the needs of students and teachers
 - Use of obsolete and environmentally unfriendly equipment
 - ICT classrooms, science laboratories, and skills training workshops are often nonexistent, or grossly inadequate and/or without any functional equipment.
- **Data Availability for Planning:**

Across board within the education system, there is weak capacity for the collection, storage and retrieval of accurate and reliable planning data at all levels of education. Data management personnel have limited skills for collating, interpreting and analyzing data, and there is a shortage of IT equipment, software and expertise. Consequently, there is low utilization of existing data capturing systems.
- **Vulnerability:**

Vulnerable groups within the population including physically challenged, children with underlying health conditions like HIV/AIDS, children of nomadic pastorals, are discriminated against. In addition, most schools do not have ramps or appropriate pathways for people or learners with physical disabilities.

(The information presented above was obtained largely from consultations and field visits to schools during the preparation of this ESMF). Baseline description of the project locations are presented in Table 6 below

Table 3: Baseline Descriptive Pictures of Project Locations

Description and Pictures	Description and Pictures	Description and Pictures
 <p>Plates 1: Lack of chairs and tables in the classrooms</p> <p>The absence of tables and chairs in the classroom, heat and lack of electricity sometimes force students to receive lessons outside the classroom</p>	 <p>Plates 2: Firewood use as source of cooking fuel in the boarding school kitchens</p> <p>Exposes the cooks to health hazards due to the fumes. Firewood collection increases menace of deforestation. Felling of trees exacerbates climate change</p>	 <p>Plates 3: Metallic waste within the school premises kept for weeks</p> <p>No concrete plans for the disposal of the materials</p>
 <p>Plates 4: Open dumping of waste within the school premises which is burnt periodically through open burning</p>	 <p>Plates 5: Dilapidated Girls Bathroom in a boarding school</p>	 <p>Plates 6: Abandoned out of use female teacher's toilet in a day school</p>



Plates 7: Traditional pit toilet in use for female students in a boarding school, no WASH facility nearby



Plates 8: Broken fence which poses security challenge to the school



Plates 9: Traditional baking facility using old smoking technology posing health risk, environmental pollution and contributing to climate change



Plates 10: Hand washing facility for girls within the classroom area



Plates 11: Use of zinc as classroom partition which emits heat thereby making the classroom inconducive and exposes the girls to injuries and tetanus from sharp edges



Plates 12: Abandoned building in a school



Plates 13: Dilapidated classroom which may have to be demolished



Plates 14: Female Toilet in an insecure desolate location



Plates 15: Rotting and Falling ceiling in a girl's hostel, walls and floors cracked and very old



3.3 Social Assessment

The following chapter highlights some of the key social inclusion and social risk issues that can help determine the potential risks to different stakeholders and the inclusion needs of especially of vulnerable stakeholders. Major social risks include: conflict/fragility, GBV/SEA, school-based violence, stigmatization/exclusion from adopting social norms. While important exclusion challenges are related to displaced populations and people with disabilities, among others. GBV/SEA as well as related school-based violence will be analysed in a client-led GBV Assessment.

3.3.1 Conflict/fragility challenges

Nigeria continues to face several security challenges in many parts of the country. Widespread conflict in the North East, the Middle Belt, and the Niger Delta of the country has made it difficult for households to access basic services and take advantage of economic opportunities. At the root of the security challenges are faulty governance mechanisms, high levels of poverty and inequality, high unemployment rates particularly among youth, as well as natural resource degradation and climate change induced stresses. The nine-year conflict in North-East Nigeria has created a deepening humanitarian crisis. About 2.8 million children are in need of education-in-emergencies support in three conflict-affected States (Borno, Yobe, Adamawa). Violence by non-state armed groups and military operations continue to affect millions of people – and in some cases have targetted the very beneficiary group identified for this project; notably, in the North-East risks of kidnapping of school girls remains a concern. The conflict combined with the ongoing military operations and its spill-over into neighboring Cameroon, Chad and Niger have caused the displacement of over 2.5 million people in the region, of whom 1.9 million are internally displaced in Nigeria, according to the International Monitoring Organisation (IOM) Displacement Tracking Matrix (DTM) Round August 2018 . The specific project locations have not been identified however such concerns may need to be considered

3.3.2 Internally displaced adolescent girls

According to the December 2015 DTM (Displacement Tracking Matrix) report, there are currently over 1.9 million Internally Displaced People (IDPs) in conflict-affected northeast Nigeria (Adamawa, Bauchi, Borno, Gombe, Taraba and Yobe). The majority of IDPs are in Borno (close to 67 percent), followed by Adamawa (6 percent) and Yobe (6 percent). Close to 56 percent of IDPs are children, and over 28 percent are five years old or younger. The number of school-age IDP children by state over the 2014- 2019 period amounts to between 550,000 and 600,000. The overwhelming majority of IDPs are with host communities, and, in many instances, IDPs children attend school with host community children. However, there are often instances where schooling facilities are not available for displaced children, and teaching takes place either in tents or mobile classrooms. Further, because of their displaced status, completion of education was disrupted when initially displaced, and this disruption can be a significant challenge for adolescent children in completing school. Within this context, consideration of IDP-related needs and support for project design and implementation would be important to enable the ability of IDPs to attend, complete and access quality learning too.

3.3.3 Social norms around access to Girls education

Discrimination against women and girls is often perpetuated by practices defended by some community members on the basis of tradition, culture, religion or superstition. Under such social norms, a woman's

role in the family and community is primarily understood as a wife and mother and little value is placed on her education or her long-term economic independence. This societal expectation puts pressure on families, to marry off their girls as soon as they reach puberty especially in the north where age of marriage is placed at 13-15 years. Conversely, in the south girls are more at-risk of Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) which has led to an alarming rate of early pregnancy amongst adolescent Girls thus are unable to concentrate on receiving education. According to OXFAM, in Nigeria, one in four women aged 15-49 has undergone FGM/C, and 48 percent of women aged 20-49 were married before the age of 18¹.

Some of the drivers of educational exclusion for adolescent girls are culturally sensitive topics (e.g., child marriage) and as such, discussion of these issues in some parts of the country is very limited, even amongst women. A key aspect of the project aims to use behavioral campaigns to change social norms about girls access to, and completion of, education. Social risks may include, for example, the further isolation or violent targeting of school girls or those in favor of girls accessing education within the context of attending these campaigns or endorsing the campaign messages. In this sense, stakeholder engagement should thoroughly assess the ideal language, pace and targeting of the campaigns to ensure they don't exacerbate existing exclusion, stigmatization or violence against girls, female teachers, parents or others within the community that either attend schools or wish to encourage the attendance of girls in school. Furthermore, managing how to have safe and robust discussions with those that may be initially unsupportive of the proposed social norms, without isolating them from their families or communities, will be critical.

3.3.4 Disability-Inclusion

About 25 million Nigerians had at least one disability, while 3.6 million of these had very significant difficulties in functioning (The World Report on Disability, 2011). Moreover, given the disparity between boys and girls in school attendance in Nigeria, young disabled girls tend to be even more excluded than their male counterparts. Children with disabilities worldwide face cultural, economic and social barriers from within and outside the education system that directly or indirectly impact their ability to get a high-quality education. Exclusion of children with disabilities from education has an adverse economic impact at the family, community, and country level. The schooling deficit experienced by children with disabilities can become the most challenging impediment to earning an income and long-run financial health as adults. To this end, it is important that the project design and implementation take into cognizance the demand and supply side barriers to inclusive education so as not to exacerbate inequality and limit the ability of persons with disability from attending, completing 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 and implementation of the project. As such, the project should ensure that new and updated school infrastructure allows for unimpeded access to all including persons with disabilities. School infrastructure should also consider the design of latrines and hand washing systems taking into account important issues

¹<https://policy-practice.oxfam.org.uk/publications/breaking-a-culture-of-silence-social-norms-that-perpetuate-violence-against-wom-620458>

such as menstrual health, privacy requirements for adolescent girls and water-borne diseases which will require prevention measures.

3.3.5 Gender Consideration

Gender is a critical factor that affects every aspect of our lives from the distribution of resources, wealth, work, decision-making, political power as well as access to rights and privileges within the society. Gender and Education are interwoven and intimately linked as women and men have distinct relationships with, dependencies on, and expertise regarding their environments. In global gender inequality rankings, Nigeria is behind its peers and continues to rank at the bottom. In order to close the gender gap in Nigeria, adolescence is a critical window to intervene, as decision adolescent girls make or are made for them at this age (for example about their education, marriage, and fertility) have far-reaching and lasting impacts on their own, their children's and their future wellbeing

3.3.6 Gender Mainstreaming and Vulnerability Statistics (from recent studies)

Gender Mainstreaming looks at the experience and interests of women and men and using them during decision-making process. Gender Mainstreaming can stimulate economic growth, raise productivity, reduce poverty and ensure community support. Nigeria ranks 118 out of 134 countries on the Gender Equality Index.² Women's disadvantaged position and lack of decision-making power in the social, economic and political spheres is reflected in policies, laws and resource allocation that thwart progress towards gender equality in the country. More than 70 percent of women live below the poverty line, and maternal mortality ratio is among the highest in the world at 576 per 100,000.³ More than half of people living with HIV (3.2 million) are women (55 percent).⁴ Girl enrolment in school lags behind boys, and represents one third to one quarter of classroom participants depending the state; and two-thirds of the 10.5 million out-of-school children, are girls.⁵ Some gender vulnerability statistics conducted by FAO is shown in table 5 below.

Table 4: Gender Vulnerability Statistics

S/No	Parameters	Rating
1	Men are more educated than their female counterpart	High
2	Men claim monopoly and ownership of farm proceeds	Moderate
3.	Women have poor access to assets, household and inputs decisions	Low
4.	Household decisions are mostly taken by men	High
5.	High rural unemployment exists with women	High
6.	Fewer female extension agents	High
7.	Low remuneration for all forms of women' work	High
8.	Less respect for women in the society	Moderate

⁶ British Council Nigeria. [Gender in Nigeria report 2012](http://hdr.undp.org/en/content/gender-inequality-index-gii); UNDP Human Development Report 2016. See: <http://hdr.undp.org/en/content/gender-inequality-index-gii>.

⁶ British Council Nigeria. [Gender in Nigeria report 2012](http://hdr.undp.org/en/content/gender-inequality-index-gii); UNDP Human Development Report 2016. See: <http://hdr.undp.org/en/content/gender-inequality-index-gii>.

⁶ British Council Nigeria. [Gender in Nigeria report 2012](http://hdr.undp.org/en/content/gender-inequality-index-gii); UNDP Human Development Report 2016. See: <http://hdr.undp.org/en/content/gender-inequality-index-gii>.

⁶ British Council Nigeria. [Gender in Nigeria report 2012](http://hdr.undp.org/en/content/gender-inequality-index-gii); UNDP Human Development Report 2016. See: <http://hdr.undp.org/en/content/gender-inequality-index-gii>.

9.	Discrimination against women's appointment	High
10.	Less access to credit by women reduces agricultural productivity	High
11.	Women are prone to GBV	High
12.	Women are mostly Sexually Harassed	High
13.	Women are more stereotyped in relation to work	Moderate
14.	Men have more access to information, training, technologies than females	High

Source: FAO and ECOWAS Commission/CGA 2016

Key

The ratings are based on the interaction between the probability of occurrence and the impact significance of the parameter on women (probability x impact significance).

High – means it is a very common occurrence and puts women at a high disadvantage

Moderate – means it still occurs considerably in some spheres with significant impacts on women

Low – means while it may not be very common, the impacts on women are not as grave as with the other categories

It is also important to state that these are not World Bank ratings and is unrelated to the overall risk rating for this project as earlier mentioned.

Gender development indicators based on FAO gender country assessment is presented below, the assessment involved a comprehensive desk review and a gap analysis, and field work that included focus group discussions, key stakeholder interviews and observations.

Gender Development Indicator

S/No	Parameter	
1.	Life Expectancy at Birth Female (years) %	55.6
2.	Life Expectancy at Birth Male (years) %	53.4
3.	Adult Literacy Rate Female (15 and above) %	65.3
4.	Adult Literacy Rate Male (15 and above) %	79.9
5.	Sex Ratio Males per 1,000 Female	1,026
6.	Gender Empowerment Measures %	66.2
7.	Combined gross enrolment ratio for primary, secondary and tertiary schools Male %	53.8
8.	Employment Ratio Men to Women in Urban Areas %	42.37
9.	Employment Ratio Men to Women in Rural Areas	63.58%

Source: FAO, Nigeria Country Gender Assessment (2018)

A more detailed GBV assessment is being conducted that will highlight relevant statistics given the project interventions.

CHAPTER FOUR: PROJECT ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

4.1 Introduction

The environmental and social risks classification for this proposed project is moderate for environmental and substantial for social as discussed previously in section 2.7. This ESMF highlights areas of interventions which are likely to generate risks associated with the proposed project. The environmental risks are linked to the activities under component 1 which proposes minor civil works. The total number of classrooms to be renovated/ rehabilitated/ constructed with its locations are yet to be determined.

4.3 Potential Project Risks

The potential risks are presented according to the project components.

Component	Activities	Potential Risks
Component 1: Safe Accessible Learning Spaces	Renovation/ construction of facilities in schools Provision of hygiene and sanitation facilities	<ul style="list-style-type: none"> • Risks associated with construction including pollution, waste management, occupational health and safety risks, community health & safety risks, and risks associated with labor influx • Inefficient use of resources like water and energy • Displacement of people (temporary squatters, IDPs, Military) and restriction of access • Disturbance of biodiversity • Risks of affecting physical and cultural resources • Increased security risks exposure for Girls in school like kidnapping, GBV/SEA • Risks from lack of maintenance and sustainability of interventions due to lack of political will and/or lack of funds • Facilities may become over-stretched from over-enrolment • Facilities may not be disability-friendly thus placing vulnerable groups at a disadvantage
	Procurement of laboratory equipment, chemicals, electronic equipment	Generation of hazardous waste, e-waste Risks of toxicity
	Continuous professional development for teachers through colleges of education.	Over-stretching of facilities to cater for the project like the Colleges of Education which are not aimed at receiving direct intervention from the project
Component 2: Enabling Families, Communities and Schools to	Provision of financial support package to families to incentivize Girls transition to and attendance of secondary school	<ul style="list-style-type: none"> • Social risks from political influence and grievances from selection of participating families • Absence of sustainability plan after the project intervention closes • Social norm disagreements with the project goals and implementation modalities

Support Girl's Education	Provision of market-relevant skills training and a graduation grant	<ul style="list-style-type: none"> • Social risks arising from grievances on selection of participants for grants and social norm disagreements with the project objectives
	Media sensitization and campaigns on the value of girls' education	<ul style="list-style-type: none"> • Unacceptability of the project due to cultural/religious beliefs or lack of trust for Government interventions. • Male counterparts may feel aggrieved as non-direct beneficiaries
	Provision of school grants to schools and other identified relevant groups	Risks of funds not reaching the intended targets, fund mismanagement and lack of accountability; this may result in community tensions due to allocated funds for beneficiaries not reaching them

4.4 Negative Environmental Impacts and Mitigation Measures

Impacts	Impact Rating	Mitigation Measures
<p>Pollution and Contamination:</p> <ul style="list-style-type: none"> • Increase in fugitive dusts and vehicular emissions and machines during civil works will cause air pollution in the project area and surrounding environment. However, this will be short term, moderate and localized • Soil/gravel brought for any filling/beautification purposes and soil removed during site preparation if not properly stored and is exposed to the natural elements can be washed off to nearby streams, rivers and low-lying areas causing sedimentation and contamination. • Improper placements of toilets facilities and boreholes can cause contamination to groundwater and surface water sources 	Moderate	<ul style="list-style-type: none"> • Stockpiles of sand, clay and other materials should be properly covered with tarpaulin -kind of materials • Cement should be stored in a safe ventilated room. • Vehicles and machinery should be serviced regularly to reduce emissions • Contractors will develop site management plans (including waste management plans) prior to commencement of construction works. • Toilets will be placed at a minimum required distance from water facilities in accordance with WHO guidelines • Emergency Preparedness and Response plans will be prepared as part of the ESMPs and the contractors management plans
<p>Increase in soil erosion/ soil contamination</p> <ul style="list-style-type: none"> • Removal of vegetation cover will lead to soil erosion which may lead to sedimentation in rivers and waterbodies and exacerbate flooding. • Leakages from construction equipment may contaminate the soil surface 	Low	<p>Ensure that constructions/renovations/expansions are not located on steep slopes, landslide or flood prone areas. If projects are located in areas prone to these risks, then proper retaining walls and strengthening of slopes should be done to minimize risks</p>
<p>Vegetation Clearance</p> <ul style="list-style-type: none"> • Removal of Natural Vegetation could disturb the natural ecosystem and exacerbate climate change • 	Low	<ul style="list-style-type: none"> • Vegetation clearance should be limited to required areas (except for clearance of grasses as part of creating a clean environment) • Project proponent should ensure that no construction/ expansions are located close to wetland or on reservation of surface water bodies •
<p>Excavation may lead to chance find and affect Physical and Cultural Resources (PCR)</p>	Low	<ul style="list-style-type: none"> • The ESMPs will contain PCR Plans/chance Find Procedure
<p>Sanitation and Waste Management Problems</p> <ul style="list-style-type: none"> • Construction and rehabilitation of school classrooms / blocks will imply the generation of debris of various forms such roof tiles, old irons sheets wastes, bricks, stones, cements which will need to be removed and disposed or reused. 	Moderate	<ul style="list-style-type: none"> • Contractors will develop waste management plans, campsite management plan etc. prior to commencement of construction works • A generic contractors campsite management plan is provided in annex 5. • Provision of potable water, toilets and wash water to the workers • Waste recycling will be encouraged in these schools and school management should partner with associations that provide recycling functions with the help pf the PIUs.

<ul style="list-style-type: none"> Waste generation from workers camps including human feces which can become breeding sites for water-borne diseases and their leachate pollute surface water sources. Presently most schools litter their wastes and cannot properly manage them. Civil works will lead to increase in waste burden on the school management. Increase in solid waste and sanitation waste during operation phase could lead to diseases and pollution 		<ul style="list-style-type: none"> Modern Incinerators should be provided for schools as part of project intervention The project should support the capacity of the sanitation departments at the LGAs in the participating locations for management of school sanitation wastes Wealth to Waste management can be tied to the planned entrepreneurship programs
<p>Sourcing of Construction Materials</p> <ul style="list-style-type: none"> Sourcing of construction materials such as sand, clay, gravels will lead to impacts related to sand mining and extraction of gravel from borrow pits or quarries. Incidents and injuries could be associated with poorly managed borrow pits and quarries. Un-reclaimed borrow pits could become drowning sites, accident prone locations, gully erosion, accidents/incidents for residents and sites for breeding mosquitoes and other vector-borne diseases 	Moderate	<ul style="list-style-type: none"> Contractors will prepare borrow pit management plans prior to construction works. All borrow pits created for the project purpose must be reclaimed to as near as its original state as possible
<p>Efficient Resource Utilization Competition for resources like water</p>		<ul style="list-style-type: none"> Contractors should provide their own source of water without dependency on school water supply or community. In the event this situation is not viable then contractors must not create conflicts between students/teachers and their workers
<p>Occupational Health and Safety</p> <ul style="list-style-type: none"> Site workers will be exposed to risks of accidental collisions with moving vehicles, strains, and ergonomics from repeated movements or from lifting and heaving of heavy objects, slips and falls. Accidental cuts from tools and machines are also safety risks. Dust and particulate emissions and welding works from rehabilitation site may cause respiratory and eye impairment health concerns for workers and the public Movement of trucks carrying sand and materials, lack of road safety measures may also cause risk of accident, injury and death Some hazardous materials maybe used during this project and contact with such may pose skin problems or otherwise. Workers may face poor living and labor conditions 	Moderate	<ul style="list-style-type: none"> Contractors will prepare Occupational Health and Safety Plans in line with the ESHG provided in this ESMF (annex 3) and site specific ESMPs that will be prepared for the sub-projects The project workers and contractor will abide by the Labor Management Procedures provided for this project Contractors waste management plans will include handling and management of hazardous waste Provision and use Personnel Protective Equipment (PPE) by workers will be enforced First aid will be provided at construction site, staging area and mobile Provision of potable water, toilets and wash water to the workers The SPIU will assess living conditions of workers' camps and ensure appropriate living conditions in line with the framework stated in annex 5. Drivers will undergo road safety training

<p>Community Health and Safety</p> <ul style="list-style-type: none"> All activities during pre-construction and construction phase can cause potential safety hazards to students, teachers and residents who are close to the construction site. This includes potential accidents from movement of equipment and vehicles to site, lack of road safety measures, exposure to hazardous materials and waste If the toilet facilities are not well maintained during the operation phase, they may become hotspots for fly infestation and other pathogens that may cause water borne diseases such as diarrhea, dysentery and typhoid Classrooms may be expanded in areas prone to erosion and landslides which could become a disaster Exposure of students to alcohol and drugs as a result of project activities in the area 	<p>Moderate</p>	<ul style="list-style-type: none"> Contractors will develop and implement drivers training plan in conjunction with Road Safety/ State Traffic Management Agencies Caution signs and flagmen will be used at strategic locations to provide warning and guidance especially for children crossing Construction activities to be carried out during holidays preferably, or otherwise site managers and HSE officer to ensure children stay off equipment areas, staging areas and construction sites. Stockpiles of sand, clay and other materials should be properly covered with tarpaulin-kind of materials Cements should be stored in a safe ventilated room Recommended toilets are ECO toilets, VIP latrines which are easier to manage. Maintenance and sustainability plans for sanitation facilities should be developed by the PIUs and Government prior to implementation Intervention designs should take into consideration erosion prone areas to avoid future disasters. Contractors should have responsibility for reporting and investigating incidents to the PIUs, which should also be reported to the World Bank
<p>Disruption of traffic and public utilities deliveries</p> <ul style="list-style-type: none"> Some schools in built up areas may cause increase in traffic during construction and operation phases Conveyance of materials may cause vehicular traffic Site preparation may disrupt the supply of public utilities such as water and electricity during excavation and terracing, electrical cables and water pipe passing through the site may be unearthed, and this may disrupt the supply of these services. 	<p>Moderate</p>	<ul style="list-style-type: none"> Traffic management plans should be prepared as part of ESMPs The contractors should liaise with the State Traffic Management Agencies in management of traffic during construction, while school management should also liaise with these agencies during operations. The PIU should liaise with public utility providers including Ministries of Work/LGA to map locations of public utilities prior to site clearance

*impact rating is a function of the probability of the impact occurring against the impact significance

4.5 Negative Social Impacts and Mitigation Measures

Impacts	Impact Rating	Mitigation Measures
<p>Disturbance from Construction Activities The noise level will disturb the students and interrupt their classes and disturb also their concentration levels. It is also likely to cause hearing impairment to workers and nearby residents.</p>	<p>Low</p>	<ul style="list-style-type: none"> Construction activities can maximize the holiday periods (usually in late March – late April, mid-July – mid September, early December – early January), or after school hours Noise mufflers should be used on noisy equipment

<p>Land Acquisition, Displacement of People, Restriction of Access, Assets</p> <ul style="list-style-type: none"> • Construction and expansion of schools may need land from private owners/communities • Land acquisition for construction may involve the displacement of people in proximity of schools especially schools with insufficient land. • Building of perimeter fence may affect people’s crops • Temporary/illegal squatters in selected facilities may be displaced including IDPs, Military etc. • Peoples access may also be blocked as a result of the project (easement) • Inadequate resettlement practices for displacements, land acquisitions, livelihoods disturbance, acquisition of borrow pits/ staging areas/ workers campsite could lead to conflicts 	<p>Moderate</p>	<ul style="list-style-type: none"> • Activities that will involve major land acquisition will not be funded by this project. School selection must be done according to the project development objectives and should be in places void of land disputes • A stand-alone Resettlement Policy Framework (RPF) has been prepared for this project. • Site-specific Resettlement Action Plan (RAPs) will be prepared for sub-projects • The project should comply with the provisions of the RPF/RAPs, associated grievances should be channeled and addressed through the project GRM. Transactional agreement for borrow pit/staging area/workers campsite acquisition/lease should be properly documented and adjudged as fair (by the SPIU social safeguards officers).
<p>Labor Influx</p> <ul style="list-style-type: none"> • The project may face influx of labor to local communities especially where skilled laborers are not available in some project sites. This could lead to Increase in potential spread of STIs/STDs, HIV/AIDs due to workers on site, increase in GBV/SEA especially for Girls been exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encourage presence of sex workers in the project communities • This could also lead to competition for resources like water, health facilities, electricity in the project locations 	<p>Substantial</p>	<ul style="list-style-type: none"> • Use of local labor should be encouraged in the project • All workers must sign Code of Conducts (contractors’ company, company management, skilled and unskilled labor, sub-contractors etc.), see annex 11 for sample. Workers campsite should be located away from social sensitivities in line with the campsite management plan in annex 5 • Sensitization of students and workers on Code of Conduct, prevention of STIs/STDs/GBV/SEA risks by health workers, Women Affairs, relevant NGOs • A stand-alone GBV assessment and action plan is been prepared for this project. The PIUs should ensure actions are implemented • A GBV-GRM will be constituted for the project with access for the Girl student in line with project GBV Assessment. • Female Guidance Counsellors will be provided in every intervention school, they will also be trained on GBV and social management procedures. Safe spaces will also be provided for use as their office • The ESMPs should identify possible areas of competition for resources and indicate where necessary the need for contractors to make provisions for such resources/ where the project should provide these resources e.g. drugs in the primary healthcare centers
<p>Potential Child Labor and Forced Labor</p> <ul style="list-style-type: none"> • Under-aged children may be used by contractors as cheap labor • There could also be incidences of forced labor or poor terms and conditions of employment 	<p>Substantial</p>	<ul style="list-style-type: none"> • The PIUs should monitor compliance with the project Labor Management Procedures • Contractors should be sensitized on the prohibition of use of children as labor and the associated sanctions

<ul style="list-style-type: none"> Grievances could also ensue from unfair treatment of workers 		<ul style="list-style-type: none"> Workers Grievance Redress Mechanism (GRM) should be provided in the ESMPs and all workers should be informed of the process
<p>Security challenges for workers and Equipment The northern region is very susceptible to violence and conflicts and civil works are likely to worsen this situation due to the presence of workers and equipment. Generally, workers may be prone to kidnapping at camp sites and equipment not well secured may be vandalized or stolen away. These instances may even cause hoodlums to shift their attention to these areas especially to sites in remote areas.</p>	<p>Substantial</p>	<ul style="list-style-type: none"> The PIUs and contractors should collaborate to develop security management plans and liaise with police/ Military where required. Community leaders should also be used to sensitize their youths to desist from such nefarious activities
<p>Insecurity Risks and GBV Risks during Operation Phase The project will ultimately lead to increase in Girls enrolment which means more Girls will traverse to school daily and more Girls will also be accommodated in hostels, this may lead to:</p> <ul style="list-style-type: none"> Exposure of Girls to sexual exploitation as they traverse to school Increased risk of kidnapping on the way and in school Exposure of more Girls to GBV in schools, cultists, alcohol, drugs Sexual harassment of female employees for all categories of workers If the Government cannot sustain the stipends for Girls after the project tenure this could leave them in a worse off state than before the project 	<p>Substantial</p>	<ul style="list-style-type: none"> Girls should be formed into groups in commuting to and fro school All participating schools should be securely fenced round with limited access and on-site trained security personnel Engage the services of monitoring groups to curb such risks including neighborhood inspectors, mother's association, SBMCs, PTA, Community leaders, Religious leaders etc. Tier capacities should also be strengthened by provision of incentives and monitoring tools. The GBV action plan as part of the project GBV assessment should be enforced Stakeholders should be encouraged to report inadequate practices through the GBV-GRM, and these reports should be forwarded to the adequate referral service in line with the project GBV action plan. Government should define a sustainability plan for interventions beyond the project lifecycle and discuss with the World Bank More funding should be allocated to the education sector CCTVs can also be put in schools were possible to enable the principal to monitor the students
<p>Inadequacy of Teachers and Facilities to Cater for Increased Enrolment</p> <ul style="list-style-type: none"> Girls enrolment may exceed the rate of teacher recruitment especially female teachers Facilities may also not be sufficient to cater for enrolment rates especially with the free education policy Colleges of Education may not have sufficient capacity for continuous teachers' development Risks of funds not reaching the intended targets, fund mismanagement and lack of accountability 	<p>Substantial</p>	<ul style="list-style-type: none"> Government of the participating states must have a plan for teachers' recruitment especially female teachers that respond to the demand of identified schools/communities Participating schools should identify their growth plans and estimates on capacity of facilities to enrolment ratio and the PIUs should comply with this plan Incentives should be provided for female teachers. Scholarships can also be provided for females to get NCE The project can liaise with previous similar education projects to leverage on their approach. Teachers training can be done in phases

<ul style="list-style-type: none"> Community expectations may be raised in view of construction of schools, however if schools are not staffed with teachers (and female ones too to address security concerns of parents), social tensions may rise in targeted communities 		<ul style="list-style-type: none"> The project should develop a transparent monitoring and evaluation framework at all levels of implementation
<p>Vulnerable Groups</p> <ul style="list-style-type: none"> Vulnerable Groups and people with disabilities may be disadvantaged from gaining from the project, especially if facilities are disability-unfriendly. In addition, internally displaced Girls due to insurgency may also miss out from benefiting from the program 	Moderate	<ul style="list-style-type: none"> Building designs should be disable friendly and deliberate attempts at supporting vulnerable groups should be made by the project. Interventions should consider areas in proximity to IDPs so displaced Girls can also benefit from the program
<p>Community Health and Safety</p> <ul style="list-style-type: none"> All activities during pre-construction and construction phase can cause potential safety hazards to students, teachers and residents who are close to the construction site. This includes potential accidents from movement of equipment and vehicles to site, lack of road safety measures, exposure to hazardous materials and waste If the toilet facilities are not well maintained during the operation phase, they may become hotspots for fly infestation and other pathogens that may cause water borne diseases such as diarrhea, dysentery and typhoid Classrooms may be expanded in areas prone to erosion and landslides which could become a disaster <p>Exposure of students to alcohol and drugs as a result of project activities in the area</p>	Moderate	<ul style="list-style-type: none"> Contractors will develop and implement drivers training plan in conjunction with Road Safety/ State Traffic Management Agencies Caution signs and flagmen will be used at strategic locations to provide warning and guidance especially for children crossing Construction activities to be carried out during holidays preferably, or otherwise site managers and HSE officer to ensure children stay off equipment areas, staging areas and construction sites. Stockpiles of sand, clay and other materials should be properly covered with trampoline-kind of materials Cements should be stored in a safe ventilated room Recommended toilets are ECO toilets, VIP latrines which are easier to manage. Maintenance and sustainability plans for sanitation facilities should be developed by the PIUs and Government prior to implementation Intervention designs should take into consideration erosion prone areas to avoid future disasters. Contractors should have responsibility for reporting and investigating incidents to the PIUs, which should also be reported to the World Bank
<p>Grievances</p> <ul style="list-style-type: none"> Social conflict and grievance may arise from selection of participants for grants, social norm disagreements with the project objectives, criteria for school selection and beneficiaries of cash transfers and other benefits, and other project activities Boys on the other hand may become aggrieved that emphasis is been paid on Girls only Unacceptability of the project due to cultural/religious beliefs or lack of trust for Government interventions 	Substantial	<ul style="list-style-type: none"> The project should comply with the GRM provided in chapter 8. GRMs will also be prepared in the site specific ESMPs. Adequate consultation, advocacy and sensitization of all interest groups should be carried out throughout the project lifecycle in line with the Stakeholder Engagement Plan (SEP) Advocacy should be done amongst Boy groups as well on the special needs of Girls hygiene and health implications which should create compassion. And Boys will also benefit from these facilities in co-education intervention schools

<p>General Project Sustainability</p> <ul style="list-style-type: none"> • Girls may become exposed to unmonitored spending of money • The project may not be sustained during the operation phase especially with change in Government • The goals for the skills acquisition component may not be fully achieved due to competition for time with other academic activities • Teachers employed during the duration of the project may lose their jobs afterwards due to unavailability of funds after the project elapses • The benefiting Girls may just be interested in the money and not in gaining quality education • There could be general failure to ensure community buy-in and participation in project implementation which could hamper project sustainability 	<p>Substantial</p>	<ul style="list-style-type: none"> • Mothers/female guardians should be carried along in dispensing of money to Girls to enable monitoring • Sustainability plans should be developed by every state and reviewed by the World Bank. (this could be added as part of the ESCP) • Skills acquisition can be programmed for Fridays and weekends where possible to allow for adequate learning hours • Government of participating states need to make deliberate efforts to increase education budgets and develop a sustainability plan to cater for all teachers been recruited and payment of incentives to Girls, teachers and families • The cash transfers/incentives/ grants will be tied to certain conditions as will be defined by the project including academic performance, school attendance, payment for qualifying exams etc. • There should be adequate consultation with community and school stakeholders to ensure their buy-in and participation.
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*impact rating is a function of the probability of the impact occurring against the impact significance

4.6 Environmental and Social Management Plan

The range of environmental and social impacts/risks associated with the proposed civil works is described in the matrix table below. The ESMP matrix outlines the various specific impacts with corresponding mitigation measures, indicator and cost of mitigation. It is expected that majority of these impacts will occur during the construction phase of the project, while fewer impacts are perceived during the pre-construction and operation phases but are nonetheless several.

Table 5: Environmental and Social Management Matrix Table

PRE-CONSTRUCTION PHASE						
Project Activities	Potential Impacts/Risks	Negative	Mitigation Measures	Indicator	Cost (\$)	Responsibility
Land clearing, excavation, creation of access, creation of	erosion, habitats destruction, fugitive emission, disruptions to classroom activities, air and land pollution		<ul style="list-style-type: none"> • Stockpiles of sand, clay and other materials should be properly covered with trampoline-kind of materials • Reuse excavated topsoil after necessary quality tests 	Re-vegetated land Burrow pits reclaimed	Part of contractor's budget	Contractors

burrow pits, campsites and staging areas		<ul style="list-style-type: none"> • Locate burrow pits away from water bodies and less vegetation areas. • Burrow pits should be reclaimed • Minimize land clearing areas as much as possible and Revegetate disturbed non - operational land • All machineries and vehicles must comply with international noise standards. These machineries shall be properly serviced for 'perfect' and noise-free operation. 	Air quality parameters within permissible limits		
Mobilization of workers to site	Influx of labor to local communities/school could lead to Increase in potential spread of STIs/STDs due to workers on site, increase in GBV/SEA especially for Girls been exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encourage presence of sex workers in the project communities	<ul style="list-style-type: none"> • Use of local labor should be encouraged in the project • All workers must sign Code of Conducts (see annex 11 for sample) and be trained on the implications • Workers campsite should be located away from social sensitivities in line with the campsite management plan in annex 5 • Sensitization of students and workers on Code of Conduct, prevention of STIs/STDs/GBV/SEA risks by health workers, Women Affairs, relevant NGOs • Stakeholders should be encouraged to report inadequate practices through the GRM, and these reports should be forwarded to the adequate referral service in line with the project GBV action plan. 	Evidence of signed Code of Conducts/ Report on training and sensitization Zero incidence of report of misconduct	Part of awareness and sensitization costs	Contractor Management/SPIUs
Land Acquisition/ Involuntary Resettlement/ Restriction of Access	Loss of livelihood, loss of assets and psychosocial impacts	<ul style="list-style-type: none"> • Ensure full participation of land owners and local communities in consultations • Limit expansion within the school's owned premises • Compliance with provisions in the RPF and RAPs 	Compliance with the RPF Payment of compensation	See RPF	Participating State Governments
Identification of Borrow pits and extraction of	Possible social conflicts with land owner Burrow pits likely to be sites for dumping waste,	<ul style="list-style-type: none"> • Borrow pit selection must be done adequately through all-round level of consultation 	Evidence of Transactional Agreement for	Part of Contractors' budget	Contractors

materials from borrow pits	entry points for gully erosion and hotspots for breeding vector-borne diseases	<ul style="list-style-type: none"> Borrow pits must be reclaimed once the civil works are completed Transactional agreement must be done with the direct land owner Land verification with traditional rulers and the relevant LGAs Contractor should obtain permission from necessary MDA prior to excavation works Proper and rapid-notification to PAPs in case of disruptions All public facilities must be identified, and relocation plans put in place in view of possible disruptions Avoid concrete works close to water bodies All equipment used must be in safe working conditions and periodically serviced Compact soil immediately after removal of topsoil Monitoring of compliance 	<p>borrow pits acquisition</p> <p>Borrow pit Reclamation Plan</p> <p>Cases of complaints or disruption of facilities</p> <p>Complaints from Students or PAPs</p> <p>Cases of water turbidity</p>	6,000 (Monitoring)	Monitoring: State Project Implementation Units
Excavation, Creation of Access Roads	Disruption of public facilities (wires and power lines)				
Extraction of Materials and excavation	Water contamination, accidental spillage and water sedimentation Soil Erosion				
		•			
CONSTRUCTION PHASE					
Project Activities	Potential Negative Impacts/Risks	Mitigation Measures	Indicator	Cost (\$)	Responsibility
Extraction of materials and transport of materials	Dust emission, traffic congestions, accidents and incidents along the vehicular route	<ul style="list-style-type: none"> Enforce speed limit and train drivers regularly Avoid extraction and excavation during extreme dry season Cover stockpiles and install pollution control devices Use of PPE 	<ul style="list-style-type: none"> Cases of respiratory complaints Dust emission controlled Traffic mgt. plan Traffic signs 	Part of Contractors Budget	Contractors/ State Traffic Management Agencies/ Road Safety

		<ul style="list-style-type: none"> • Implement Traffic Management Plan • Use appropriate equipment for crushing stones 	<ul style="list-style-type: none"> • Certificate of attendance for training 		
Masonry and Carpentry Works	OHS related risks	<ul style="list-style-type: none"> • Use of PPE • Availability of Health Insurance for workers • Presence of functional first aid kits with transfer First-aider on site/ community health service worker 	Cases of Accidents/Incidents	9,700	Contractors
Welding Works	Risks of fire outbreak within the working area, accidents due to unsafe working conditions Accidents due to inadequate equipment or unsafe	<ul style="list-style-type: none"> • Use of PPE • Train, supervise and regular PEP talks with personnel • Ensure machinery and equipment are always in good working conditions and comply with the ESS-2 guidelines • Remove any know hazards within the work environment 	Cases of Accidents/Incidents	Part of Contractor's Budget	Contractor
Masonry and Carpentry Works	Risks of loss of biodiversity due to degradation of water bodies and disturbance of natural habitats	<ul style="list-style-type: none"> • Ensure civil works are far away from water bodies and natural habitats • Ensure material stockpiles are safely stored away from such areas • Stockpiles should be stored in strategic points • Stockpiles should be covered during rainy season or extreme weather conditions • Monitoring and compliance 	Cases of water bodies pollution	6,000 (monitoring)	Monitoring: State Project Implementation Units
Disposal of cleared materials and excavated materials	Increase in waste burden for the school management Increase in inappropriate acts of burning waste	<ul style="list-style-type: none"> • Implement Waste Management Plan • Contractor should reuse and recycle materials • Only necessary materials should be excavated from borrow pits • Liaise with the state MDA on waste management 	Waste Management Plan Evidence of littered wastes	Part of Contractors Cost Monitoring costs (same as above)	Contractor/ SPIUs
Extraction of materials from borrow	Loss of topsoil and Landscape value	<ul style="list-style-type: none"> • Reclaim all borrow pits • Hold topsoil and revegetate 	Cases of non-compliance	Part of Contractors Cost	Contractors / SPIUs

pits and excavation within the school premises	Associated effects on ecosystem OHS Risk	<ul style="list-style-type: none"> Implement OHS Plan and Labor Management Procedures 		6,000 (monitoring)	
All Civil works	<ul style="list-style-type: none"> Disruption of school activities Noise and dust emission Risks of soil erosion due to runoffs water coming from class rooms roofs 	<ul style="list-style-type: none"> Adequate sensitization amongst students Install erosion control Civil works should be done during off-school hours Concentrate the construction activities to dry season to the extent possible Re-vegetate areas where bare soil is created due to construction works Site excavation works to be planned such that a section is completed, constructed or rehabilitated before another section begins. 	<p>Vegetated areas</p> <p>Rainwater Harvesting System</p>	4,861	Contractors/ School management
Presence of foreign workers on site	Presence of foreign workers in the school/ communities could lead to Increase in potential spread of STIs/STDs due to workers on site, increase in GBV/SEA especially for Girls been exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encourage presence of sex workers in the project communities	<ul style="list-style-type: none"> Use of local labor should be encouraged in the project All workers must sign Code of Conducts (see annex 11 for sample) and be trained on the implications Workers campsite should be located away from social sensitivities in line with the campsite management plan in annex 5 Sensitization of students and workers on Code of Conduct, prevention of STIs/STDs/GBV/SEA risks by health workers, Women Affairs, relevant NGOs Stakeholders should be encouraged to report inadequate practices through the GBV-GRM, and these reports should be forwarded to the adequate referral service in line with the project GBV action plan. 	<p>Evidence of signed Code of Conducts/ Report on training and sensitization</p> <p>Zero incidence of report of misconduct</p>	Part of awareness and sensitization costs	Contractor Management/ SPIUs

Masonry works, day to day civil works	Risks of increased energy consumption Risks of school building collapse due to old structures, adjacent to rehabilitated structures	<ul style="list-style-type: none"> • Ensure minimization and optimization of power usage • Ensure equipment, appliances and lights are switched off when not being used; • Install energy saving fluorescent tubes at all lighting points • instead of bulbs which consume higher electric energy; • Explore use of renewable energy like solar energy 	Monitoring plans for reduction of energy use	Part of Contractors' Budget	Contractors
All construction works	Overuse of water and conflicts arising from water usage by contractors	<ul style="list-style-type: none"> • Contractors should make provision for all civil works • Harness rainwater harvesting • Promptly detect, repair water pipe, tank leak • Sensitize staff to conserve water; Install water conserving taps that turn-off automatically when water is not being used 	Evidence of conflict with students or community members	2,500	Contractors
	Poor hygiene and sanitation due to sewage	<ul style="list-style-type: none"> • Provide mobile toilets • Install toilets away from rivers or areas with shallow groundwater • Always keep clean toilets 	Clean toilet	Part of contractors cost	Contractors
	Littered wastes	<ul style="list-style-type: none"> • Implement 3R principles (Reducing, reusing, recycling) wastes; • Avail solid waste bins and sort garbage accordingly • Construction materials left over at the end of construction are used in other projects rather than being disposed of • Use of durable, long-lasting materials that will not need to be replaced as often 	Solid waste Bins Presence of rodents or rats	Part of contractors cost	Contractors
Land Expansion	Degradation of cultural sites	<ul style="list-style-type: none"> • Avoid land takes from burial sites, shrines or archaeological areas and consider the alternative • Implement the ESS 8 	Evidence of complaints of disruption	See RPF	State Project Implementation Units (SPIUs)

<p>All civil works</p>	<p>Risks of different work hazards (falls, Slips, burnt, ergonomics, fatigue, stress, fire incidents, STDs etc.)</p>	<ul style="list-style-type: none"> • Train workers on STDs and sensitize them • Voluntary free medical tests • Ensure that all plans and equipment to be used are certified by the relevant authority • Provide well stocked first aid box to be easily accessible within the premises; • Fire-fighting equipment e.g. fire extinguishers and hydrant systems should be provided at strategic locations • Regular inspection and servicing of the equipment must be undertaken by expert • Provide all necessary signage (English and local language) indicating works in progress, communicate to public on segments to be worked on, alternative routes; • Circuits must not be overloaded; • Electrical fittings near all potential sources of ignition should be flame proof • All electrical equipment must be earthed • Keep a record of all hazardous chemicals used at construction sites • No eating or drinking in areas where chemicals are stored or used; • Provide workers with PPEs regularly • Ensure that construction workers are provided with adequate supply of wholesome drinking water; 	<p>Evidence of complaint of new disease within the project area</p> <p>Emergency Plans</p> <p>No of accidents/incidents</p>	<p>5,000</p>	<p>Contractors/ SPIUs</p>
<p>All civil works</p>	<p>Deterioration of workers health</p> <p>Child Labor/Forced Labor</p>	<ul style="list-style-type: none"> • Provide clean water always • Provide training to workers on OHS • Workers welfare should be important to contractors and their sleep and work environment must be conducive • Contractors must avoid hiring children for menial activities no matter the situation. No one should be forced to work 	<p>Cases of complaint from workers based on welfare conditions</p> <p>Presence of Child labor</p>	<p>Part of Contractor's Budget</p>	<p>Contractors</p>

		<ul style="list-style-type: none"> OHS should be monitored systematically 	Evidence of forced Labor		
	Insecurity at project sites	<ul style="list-style-type: none"> The proponent must hire a security outfit in high risk areas as will be identified in the ESMPs to provide intelligent tips to contractors Contractor should cooperate with administration to appoint security personnel operating 24 hours where needed Body-search the workers to avoid getting weapons on site, to ensure nothing is stolen Ensure only authorized personnel get to site Security alarms will be installed in vehicles and other appropriate devices or areas; 	Cases of insecurity complaints	Costs will be integrated in a security assessment as required	SPIUs
	Possible social conflicts with students or community members	<ul style="list-style-type: none"> The proponent must ensure a functional GRM is in place throughout civil works Community members must be given the priority during workforce selection Identify construction workers by wearing uniforms and even name tags; Prohibit all construction workers from socializing with students or residents, collection of timber forestry products 	Cases of Conflicts	Part of Contractors' Budget	Contractors
Operation Phase					
Project Activities	Potential Negative Impacts/Risks	Mitigation Measures	Indicator	Cost (\$)	Responsibility
Enrollment/ School Operations	Disabled Girls/ internally displaced Girls may not benefit from the project	<ul style="list-style-type: none"> Facilities design should take into consideration disability-friendly solutions Interventions should consider areas in proximity to IDPs so displaced girls can also benefit from the program 	Numbers of benefiting disabled Girls/ IDP Girls	Part of project design/ selection	State Ministries of Education/ SPIUs
	Teachers may be insufficient to match the number of students from	<ul style="list-style-type: none"> The State Ministries of Education to draw up a sustainability plan on teacher recruitment 	Ratio of Teachers to Students not exceeding 1:60	-	State Governments/ State Ministries of Education

<p>increased enrollment to exceed the national provision of 1: 60</p>				
<p>Increased number of girls exposed to harassment, SEA/GBV</p> <p>Exposure of Girls to sexual immoralities, alcohol, substance abuse etc. in school</p>	<ul style="list-style-type: none"> • Mothers/female guardians should be carried along in dispensing of money to Girls to enable monitoring • Project should leverage on the use of monitoring groups (formal and informal) to monitor conduct of the school Girls within the localities • The Guidance and counselling function should be strengthened via provision of safe spaces, specialized trainings and Girls should be encouraged to seek counsel and report abuse • Sensitization and awareness programs, sex education should be integrated as part of school activities • Access to functional sickbays/clinics should be provided for the Girls 	<p>Minimal incident reports</p> <p>Functional Guidance and counselling in schools</p> <p>Number of awareness campaigns in schools</p>	<p>State Education Budget/ State Health/ Women Affairs programs</p>	<p>State Ministries of Education/ State Ministries of Women Affairs/ School Management</p>
<ul style="list-style-type: none"> • The project may not be sustained during the operation phase especially with change in Government • Teachers employed during the duration of the project may lose their jobs afterwards due to unavailability of funds after the project elapses • Loss of access to grants may expose the Girls to social ills 	<ul style="list-style-type: none"> • Sustainability plans should be developed by every state and reviewed by the World Bank. (this could be added as part of the ESCP) • Government of participating states need to make deliberate efforts to increase education budgets and develop a sustainability plan to cater for all teachers been recruited and payment of incentives to Girls, teachers and families 	<p>Monitoring and Evaluation results</p> <p>Long term program sustainability index</p>	<p>Part of State Education Budget</p>	<p>State Governments/ State Ministries of Education</p>

School Operations	School building collapse from erosion or landslides	<ul style="list-style-type: none"> Intervention/design to consider locations that are prone to such hazards and ensure mitigation measures are embedded in the designs 	Zero incidence/ accident report on such cases	Part of design costs	State Ministries of Education/ SPIUs
TOTAL				40,061	

4.7 Labor Influx

This project may face an influx of non-local labor and working conditions issues as skilled laborers might not be available in some of the project sites. Therefore, the FPCU/SPIUs will take concrete measures to mitigate potential labor influx-related risks such as workers' sexual relations with minors and resulting pregnancies, presence of sex workers in the community, the spread of HIV/AIDS, sexual harassment of female employees, child labor and abuse, increased dropout rates from school, inadequate resettlement practices, and fear of retaliation, failure to ensure community participation, poor labor practice, and lack of road safety. These risks require careful consideration to improve social and environmental sustainability, resilience and social cohesion. Mitigation measures included in the ESMP table which must be monitored by the SPIUs include:

- (a) assessing living conditions of workers' camps and ensuring appropriate living conditions;
- (b) establishing proper agreement with host community on equipment staging area
- (c) establishing and enforcing a mandatory Code of Conduct for the company, managers and workers, and an Action Plan for implementation;
- (d) ensuring appropriate location for these camps;
- (e) taking countermeasures - indicated in the Social Management Plan - to reduce the impact of the labor influx on the public services; and,
- (f) devising and implementing a strategy for maximizing employment opportunities for local population, including women.

4.8 Gender Based Violence

4.8.1 Introduction and Statistics

Nigeria ranks 118 out of 134 countries on the Gender Equality Index.⁶ Women's disadvantaged position and lack of decision-making power in the social, economic and political spheres is reflected in policies, laws and resource allocation that thwart progress towards gender equality in the country. More than 70 percent of women live below the poverty line, and maternal mortality ratio is among the highest in the world at 576 per 100,000.⁷ More than half of people living with HIV (3.2 million) are women (55 percent).⁸ Girl enrollment in school lags behind boys, and represents one third to one quarter of classroom participants depending the state; and two-thirds of the 10.5 million out-of-school children, are girls.⁹

⁶ British Council Nigeria. [Gender in Nigeria report 2012](#); UNDP Human Development Report 2016. See: <http://hdr.undp.org/en/content/gender-inequality-index-gii>.

⁷ The 2013 Nigeria Demographic and Health Survey (NDHS). See: <https://dhsprogram.com/pubs/pdf/PR41/PR41.pdf>.

⁸ UNAIDS 2017 Data. See: http://www.unaids.org/sites/default/files/media_asset/20170720_Data_book_2017_en.pdf.

⁹ NDHS 2013.

The wide diversity and distinct socio-economic, cultural and political contexts across Nigerian geopolitical regions and states results in different gender related vulnerabilities. While gender inequitable norms prevail throughout the country, these vary by region and interact with other structural, community and individual factors exposing women, girls and boys to some forms of GBV more than others. The socioeconomic status of women and girls in the northern zones lags behind those in the south: only 3 percent of girls in the North complete secondary school, over two-thirds aged 15-19 years are unable to read compared to less than 10 percent in the South, and 76 percent are married by age 18 in the northwest.¹⁰ Child marriage, acceptance of wife beating, restricted movement of women and girls are more pronounced in the North, and the prevalence of sexual violence, conflict related GBV and SEA is higher than in the South. In the South FGM, IPV, physical violence by any perpetrator, trafficking and harmful widowhood practices are more prevalent.

The term ‘gender-based violence’ reflects the underlying and systemic gender inequality which is a key driver of violence. Gender inequality exists in Nigerian households and communities, as in every society in the world; it results in women and girls experiencing limited choices, as well as restricted access to resources and opportunities compared to men and boys. The unequal distribution of power between men and women, along with engrained norms and rigid expectations on gender roles are the core drivers of GBV. GBV cuts across culture, level of education and income, religion, ethnicity, and other demographic indicators. GBV is directed at an individual based on his or her biological sex or gender identity. It includes physical, sexual, verbal, emotional, and psychological abuse, threats, coercion, and economic or educational deprivation, whether occurring in public or private life.

4.8.2 Manifestations of GBV

To understand if an act of violence is an act/manifestation of GBV, one must consider whether the act reflects and/or reinforces unequal power relations between males and females. Many—but not all—forms of GBV are criminal acts in Nigeria laws and policies

- Physical Violence (such as slapping, kicking, hitting or use of weapons)
- Emotional abuse (such as systematic humiliation, controlling behavior, degrading treatment, insults, and threats);
- Sexual violence, which includes any form of non-consensual sexual contact, including rape;
- Early/forced marriage, which is the marriage of an individual against her or his will often occurring before the age of 18, also referred to as child marriage;
- Economic abuse and the denial of resources, services, and opportunities (such as restricting access to financial, health, educational, or other resources with the purpose of controlling or subjugating a person);
- Trafficking and abduction for exploitation

4.8.3 National Legal and policy framework on GBV

Nigeria’s national government has taken steps to penalize and address GBV and SEA, although a clear leadership with the leverage to garner multi-sectoral support to address this complex problem seems

¹⁰ NDHS 2013; British Council Nigeria, 2012.

absent. The institutional champion of women’s and children’s rights and GBV issues within the government is the Federal Ministry of Women Affairs and Social Development (FMWASD). But it has limited influence on sectoral ministries who need to enforce policy, insufficient budgetary resources¹¹ and insufficient institutional capacity to enact its mandate.

The regulatory framework to address both GBV, SEA and VAC is uneven because the Nigerian legal system is plural, and different legal systems co-exist, namely, the statutory law, Sharia law in the northern regions, and customary law in rural areas. The simultaneous application of this three-tier system creates differentiated degrees of protection to women’s and children’s rights¹² which varies in every state and its enforcement is weak. There is a lack of clear mandates regarding which institutions oversee child protection and the design and implementation of violence prevention strategies and provision of services. Insufficient budget allocation both at national and state levels, coupled with inadequately trained and staffed structures to provide social welfare, justice, education and health services that are women, child and survivor-centered. While efforts to provide GBV survivors with basic response services is concentrated in the NE by international non-governmental organizations or the UN system, there are very limited government or non-governmental services in the rest of the country, those that exist are for the most part unregulated, uncoordinated and unpredictable.¹³ This is aggravated by a generalized lack of trust of citizens, particularly women, in the criminal justice system to enforce the existing laws. Moreover, lack of awareness of laws and knowledge of rights, amidst a context dominated by social norms that legitimate the perpetration of abuse, stigma and underreporting, results in the consequent impunity of perpetrators, possible re-victimization of survivors and the reproduction of the cycle of violence.

Two key national laws address GBV: the [Child Rights Act](#) (CRA, 2003), and the [Violence Against Persons Prohibition Act](#) (VAPP, 2015) which have been passed by the Federal Capital Territory (FCT) but not by many of the 36 states, making them inapplicable in those that haven’t adopted them. While CRA has been passed in 24 states, VAPP has been passed in 4 states in addition to the FCT. Where laws are domesticated, implementation remains weak as institutional capacities are weak (social welfare, police, family courts). In practice, the legal and judicial systems provide women and children with little protection against violence, and timely and adequate support services are scarce and often ill-equipped to respond to survivors’ needs.

4.8.4 GBV Risks in the Adolescent Girls Initiative for Learning and Empowerment Program

GBV risks in the project is substantial due to the nature of the project which is centered around adolescent Girls. This could include public harassment including verbal insults, physical abuse, rape, harmful practices and child trafficking. Specific project GBV exposure may come from the following:

- Having to travel long distances to school exposes the girls to risks
- Absence of streetlights within schools and around school areas
- Influx of workers to school environment
- Recruitment of male teachers and male staff in the schools
- Lack of awareness on different forms of GBVs and sensitization

¹¹ [UN Women](#) data from 2011.

¹² UN CEDAW 2017.

¹³ UNICEF 2018.

- Social norms and beliefs
- Stigmatization of GBV victims
- Conflicts between parents/guardians about the use of funds/conflicting social norms about girls' access to education. In such cases, incidents of interpersonal violence (IPV) such as domestic violence may be exacerbated
- Non-functional referral pathway for GBV victims

A stand-alone GBV assessment is been prepared for the project with defined action plans and the Government will include commitments on GBV in the Environmental and Social Commitment Plan (ESCP) and ensure that funds are made available timely for implementation of such action plans. The PIUs will include in the bidding documents ('pre-qualification' and 'employers' requirements') key principles and specific requirements to address GBV so as to reduce and mitigate the risks of GBV especially during project implementation. Such measures will include:

- GBV/SEA assessment of project with attendant mitigations actions and costs;
- Mandatory contractors' code of conduct on sexual harassment;
- Monthly site visits by the safeguard unit/GBV officer to monitor GBV/SEA during construction/implementation phase;
- Community and workers' sensitization on GBV/SEA;
- Provision of referral units for survivors of GBV/SEA;
- Provisions in contracts for dedicated payments to contractors for GBV/SEA prevention activities against evidence of completion;
- Contractor and SPIU requirement to ensure a minimum target of female employment with incremental rewards of the obtainment of this target.

The project is expected to comply with the GBV assessment and action plans that will be developed for the project.

4.9 Monitoring Plan

Environmental and Social monitoring is an important component of the ESMF. It establishes appropriate criteria to validate the predicted impacts and ensure that any unforeseen impacts are detected, and the mitigation adjusted where needed at an early stage. The plan will ensure that mitigating measures are implemented during renovation, upgrading and maintenance. The objectives of the monitoring plan are as follows:

- Improve environmental and social management practices;
- Check the efficiency and quality of the ESMP processes;
- Establish the scientific reliability and credibility of the ESMP for the project
- Help to correct deviations from mitigation measures or unanticipated changes
- Provide the opportunity to report the results on safeguards and impacts and proposed mitigation measures implementation;

4.10 Monitoring Procedure

While monitoring indicators, responsibilities and budget have been included in the generic ESMP matrix table (see table 9 above), site specific ESMPs will also contain a detailed monitoring program. A checklist can be easily used to ascertain compliance to environmental and social requirements of the subprojects. A sample checklist that can be used by the E&S consultant is depicted in annex 6.

CHAPTER FIVE: ENVIRONMENTAL AND SOCIAL SCREENING OF SUBPROJECTS

5.1 Introduction

This chapter sets out procedures to be adopted for the screening of sub-projects once the project specific location and design of the subprojects are known, with the aim to identify potential negative impacts and appropriate mitigation measures.

5.2 Environmental and Social Screening Procedures

The objective of screening is to determine the appropriate level of environmental and social impact assessment and management for a proposed subproject. Environmental and Social screening process distinguishes sub-projects and activities that have negative environmental and social impacts or those which will provide opportunities to enhance positive impacts and identify the appropriate instruments and plans that will be required to mitigate the envisaged impacts. A generic environmental and social checklist that can be used for this purpose, for various sub-projects is presented in Annex 6.

All potential sub-project intervention sites will be screened for Environmental and Social (E&S) impacts prior to approval by the PIU and the Bank. The Environmental and Social Assessment Unit of the State PIU can carry out the screening or consultants can be engaged to conduct the screening. As shown in figure 3 below, the sub projects will be subjected to an Environmental and Social Screening (E&S) procedure using the screening checklist. The 3 possible outcomes from the screening include:

1. carry out a simple Environmental Review if the sub project may create a few minor and easily mitigated environmental problems, this is for low risk projects;
2. carry out an ESIA for projects with more significant, disperse, irreversible risks, this is for high risk projects (however, it is not envisaged that any subproject will require ESIA. For subprojects that require attention to existing environmental problems at the site rather than potential new impacts, an environmental audit may be more useful than an impact assessment in fulfilling the EA needs.
3. carry out an ESMP if the sub project may create minor environmental problems that are site specific and require frequent site visits or construction modifications to minimize or eliminate impact, this is for moderate and substantial risk projects.

Environmental and Social Screening Procedure

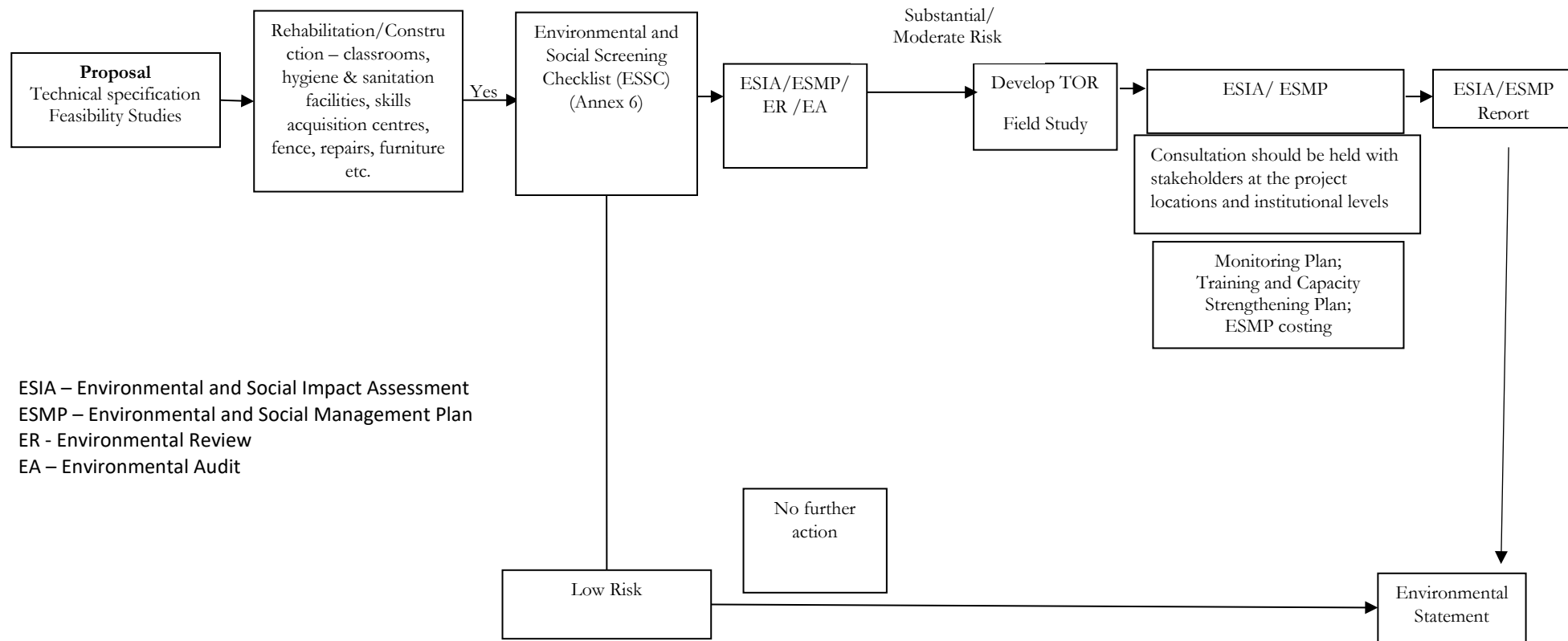


Figure 1: Environmental and Social Screening Process

5.3 Development of Terms of Reference for ESMP/ESIA

The report of the screening exercise (according to both Nigeria EIA decree and World Bank requirements) will be sent to the World Bank for review and clearance. Following the review of the screening and scoping, terms of reference (TOR) and the preparing ESIA/ESMP will be prepared by the client and cleared by the World Bank.

5.4 Development of Terms of Reference for ESMP/ESIA

The World Bank favors preventive measures over mitigation or compensatory measures, whenever feasible. The ESIA/ESMP will be carried out by seasoned consultants, the report will be cleared by the World Bank and disclosed in-country according to national laws, and on the World Bank external website.

5.5 Integrating Environmental and Social Mitigation Measures in Project Design and Tender Documents

The mitigation measures developed and in subsequent specific safeguards instruments (ESIA/ESMP) will be integrated into the project design and tender documents. By using this approach, the mitigation measures will become part of the project construction and operation phase. By including the mitigation measures in the contract or in specific items in the Bill of Quantities, monitoring and supervision, mitigation measure implementation could be covered in the engineering supervision provisions of the contract. This integration is articulated as follows:

Project Design	The mitigation measure integration in the design phase will help in strengthening the benefits and sustainability of the project. Such a step will enhance the mitigation measures in terms of specific mitigation design, cost estimation of the mitigation measure, and specific implementation criteria.
Project Contract	The project contractor should be bound by the parameters identified in the environmental and social assessments (ESMP) pertaining to specific mitigation measures in the contract. The final acceptance of the completed works should not occur until the environmental clauses have been satisfactorily implemented.
Bill of Quantities	The tender instruction should explicitly mention the site-specific mitigation measures, materials to be used, labor camp arrangements and waste disposal areas , as well other site specific environmental and social requirements.
Supervision and Monitoring	The purpose of supervision is to ensure that specific mitigation parameters identified in the environmental and social assessment and as bound by the contract is satisfactorily implemented.

CHAPTER SIX: ESMF IMPLEMENTATION ARRANGEMENTS

6.1 Introduction

The success of the implementation of the environmental and social standards will depend on commitment, coordination, capacity and defined roles and responsibilities of actors in the implementation arrangements. This section defines the roles, responsibilities and institutional arrangements and capacity building plan for the ESMF implementation. It is highly critical that all relevant MDAs collaborative effectively as failure to do so will bring ineffectiveness and failure of the program development objective.

To ensure that ESF and ESS standards are mainstreamed and effectively managed there will be a dedicated Project Coordinating Unit (PCU) at the Federal Level and State Project Implementation Units (PIU) at the State level for the participating States. Within the Federal PCU and each PIU, there shall be skilled staff in the areas of environmental and social management, specifically, environmental and social officers.

6.2 Institutional Roles and Responsibilities for Implementing the ESMF

The roles and responsibilities of the various institutions towards the implementation of the ESMF are outlined in table 10 below

Table 6: Roles and Responsibilities for ESMF Implementation

Institution	Roles and Responsibilities
Federal Project Coordinating Unit (PCU)	<ul style="list-style-type: none"> • Ensure timely preparation of all ESF instruments E&S Frameworks • Communicate ESF instruments to all stakeholders at the Federal Level through consultations and disclosure • Ensure E&S staffing of the State PIUs with qualified officers • Provide oversight monitoring function on the timely preparation, review and implementation of site-specific E&S instruments
State Project Steering Committee	<ul style="list-style-type: none"> • Provide support to the State PIU in terms of guidance, conformity and operation of the ESMF. Specifically; • Ensure funds are made available by the Government for addressing project E&S requirements as stipulated in the ESCP, ESMF, SEP, LMP and other plans • Promote multi-sector dialogue and ensuring conformity • Sector policy and project harmonization • Taking decisions on recommendations from the PIU
State Project Implementation Unit	<ul style="list-style-type: none"> • Responsible for the day to day implementation of the Project including the preparation of annual work plans • Coordinate E&S planning and response • Ensure that the project design and specifications adequately reflect the recommendations of the ESIA/ ESMPs • Monitor the project work to ensure that the activities are carried out in a satisfactory manner • Progress reports and budgets

	<ul style="list-style-type: none"> • Disclosure of E&S instruments prepared for the project in coordination with the EA department of the Ministry of Environment/ FPCU
Environmental and Social Assessment Officers – PIU (Environmental Officer, Social Officer, GBV Officer)	<ul style="list-style-type: none"> • Reviews TOR and ESMPs prepared for the sub-project sites • Ensure that the project design and specifications adequately reflect the recommendations and mitigation in the ESMPs • Co-ordinate application, follow up processing and obtain requisite clearances required for the project, if required • Prepare compliance reports with statutory requirements • Develop, organize and deliver training program for the SPIU staff, the contractors and others involved in the project implementation, in line with training plan in the ESMF, RPF, SEP, LMP, ESMPs • Ensures that ES commitment clauses including labor and GBV management components are contained in the contractors bidding documents and contracts • Ensure sensitization of contractors and project communities on Code of Conduct, prevention of STDs/STIs, GBV/SEA • Establish and implement a Grievance Redress Mechanism • Ensure contractors prepare their C-ESMPs and implement it • Monitor contractor’s compliance to the ESMP, Code of Conduct, Labor Management Plan (LMP) and other site-specific plans prepared including Occupational Health & Safety (OHS), Waste Mgt. Plan (WMP) etc.
Ministry of Women Affairs, Ministries of Education	<ul style="list-style-type: none"> • Collaborate on sensitization and advocacy on girl’s child education • Ensure effective GRM and GBV reporting mechanism at the state level • Implement sex education campaigns in schools and risks associated with under-age marriage/pregnancy
Local Government Authority (LGA)	<ul style="list-style-type: none"> • Serve as a liaison between the community members and the project institutions • assist in the implementation of the proper community mechanism • awareness campaign for the proposed project, amongst the various relevant grass roots interest groups • Monitor and report on project activities to the PIU • Channel for Grievance Redress Mechanism
CBOs, NGOs, Associations, Groups, School Management	<ul style="list-style-type: none"> • Monitor and evaluate project activities • Partner with the project on sensitization and delivery of project objectives • Independent observation of project compliance to E&S Requirements
World Bank	<ul style="list-style-type: none"> • Review and clearance of TORs, ESMF/ESMPs • Recommend additional measures for strengthening environmental management • Provide oversight guidance on E&S

6.3 Capacity Assessment of Institutions to Implement the ESMF

The first step in pursuing capacity building is to identify the capacity building needs of the various stakeholders. Capacity building should be viewed as a continuous process and it should be viewed as a process of equipping individuals with the understanding, skills and access to information, knowledge and training that enables them to perform effectively. An outcome of the public consultations is the capacity needs assessment for implementation of E&S procedures at the State Ministries, Departments and Agencies (MDAs) as well as the PIU. Effective implementation of the ESMF can be inhibited by limited

technical skills and resource constraints. Some of these capacity gaps have been identified in the “Assessment of the Government’s Policy and Regulatory Framework” in Chapter 2. Further limitations identified include:

- limited knowledge of the line MDAs on Nigerian EIA Laws and the World Bank Safeguards policies;
- lack of enforcement of development control regulations;
- lack of coordinated synergy amongst MDAs on E&S planning and response

Effective implementation of the ESMF necessitates the need for technical capacity in the human resource base of implementing institutions as well as logistic facilitation. Implementers need to identify and understand the environmental and social issues.

6.4 Training Plan

Table 7: Training Plan for ESMF Implementation

Training Title	Participants	Timeline	Cost (\$)
<ul style="list-style-type: none"> • World Bank ESS Stakeholder Engagement • Nigerian EIA Procedural Guideline Environmental • Social Clauses in Contractors’ contract and bidding documents • ESMF Implementation 	State MDAs, FPCU, SPIUs	Project Preparatory	12,000
<ul style="list-style-type: none"> • Operationalization of Grievance Redress Mechanism • GBV Training • Labor influx management/ Labor Management Plan • Occupational Health and Safety/ HSE 	FPCU, SPIUs	Prior to Construction	18,000
<ul style="list-style-type: none"> • Code of Conduct for Contractors • GBV Sensitization and Training • ESMP Training and Implementation 	SPIUs, Contractors, Supervision Consultants	Prior to Construction	
		TOTAL	30,000

6.5 Disclosure of Documents

The FPCU/SPIUs will make copies of this ESMF and other Safeguard Instruments (such as ESIA/ESMP/RAP/ARAP) available to the public and relevant MDAs through media advert (radio, television), community forums and the government official website in line with the National EIA procedures as stipulated by FMEnv. Specifically, the publication will be launched for 21 days:

- In 2 National Newspapers

- Local newspapers in the participating states
- Radio announcements
- Designated centers at the Federal and State levels including Federal Ministry of Education, Federal Ministry of Environment
- Websites of Federal Ministry of Education, Environment and other relevant MDAs
- World Bank external website

6.6 Estimated ESMF/ESMP Implementation Budget

The indicative budget for implementing the ESMF/ESMP is \$269,565 (₦97,043,720), for estimated 7 states participation across all participating schools. It includes the cost of mitigation and management, capacity building and strengthening for safeguards, GRM and GBV prevention and management. The details are presented in table 12 below.

Table 8: Budget for ESMF/ESMP Implementation

S/No	Activity	Description	Estimate US (\$)	Estimate Naira(N)
1.	Capacity Building	<p>Training workshops:</p> <p>Average of N1,500,000 per state (cost of hiring expert consultants, venue, refreshment, logistics, training materials etc.)</p> <ul style="list-style-type: none"> ✓ Training for building E&S capacity of SPIU-1 day ✓ Training for MDAs monitoring compliance to mitigation – 1 day ✓ Training for all contractors on HSE, CoC, GRM, C-ESMP – 2 days 	30,000	10,800,000
2.	Awareness creation and Sensitization	<p>Meetings, Workshops and Stakeholder Engagement Meetings:</p> <p>Average of N1,000,000 per state</p> <p>Sensitization and awareness programs on health campaigns on STIs/STDs, stakeholder engagement meetings in schools, communities, at state level, mobilizing community-based associations for monitoring</p>	19,444	7,000,000
3.	ESMP Mitigation Costs	<p>Implementation of Mitigation measures for E&S Risks:</p> <p>Average of N2,060,280 per state spread across all schools in various locations for environmental and social mitigations</p>	40,061	14,421,960
4.	Monitoring & Compliance for E&S	<p>Monitoring of implementation of mitigation measures by SPIU/MDAs including site visits, logistics</p> <p>Hiring of consultants/ experts to prepare ESMPs/RAPs in the 7 states</p> <p>Disclosure of E&S Instruments for the project</p> <p>Average of N6,000,000 per state</p>	116,666	42,000,000

5.	GRM Implementation Cost	Establishing and operationalizing GRM, GRCs incentives: Purchase and manage complaint boxes, training of GRCs, stipend for GRC members for monitoring and reporting activities, designated phone access, project monitoring of grievance log/compliant boxes (twice weekly) etc. <i>Average of N2,000,000 per state for all sites</i>	38,888.9	14,000,000
6.	GBV Prevention and Management	GBV Assessment and implementation of GBV Action Plan: Hire GBV expert to map referral services and sensitize stakeholders especially participating schools, capacity building for school Guidance and Counselors on GBV and survivor centered approach	To be captured in stand-alone GBV assessment	
7.	Sub-Total		245,059.9	88,221,564
8.	Contingency	10% of Sub-total	24,505.99	8,822,156.4
Grand Total			269,565.89	97,043,720

CHAPTER SEVEN: STAKEHOLDER CONSULTATION

7.1 Introduction

In line with the requirements of ESS10, stakeholder consultations will form an integral part of this project, from project preparatory, implementation through operations. Accordingly, a stand-alone Stakeholders Engagement Plan (SEP) has been developed for the project.

The ESMF study included consultations with identified stakeholders including government agencies, project affected areas and social groups. Consultations were conducted from 23-25 October in Kano and 30 October-1 November in Ekiti state through interviews and focus group discussions. This involved intensive stakeholder / public involvement and participation with representatives from:

- Federal Ministry of Education
- State Ministries of Education
- State Universal Basic Education Board (SUBEB)
- State Ministry of Women Affairs
- NIPEP (Federal and State)
- School Management/ Principals
- Students
- School Basic Management Committee (SBMC)
- Mothers Association

In addition, the ESMF was presented to stakeholders from Federal Ministry of Education and the Bank's task team on November 5th at the World Bank Office during the project mission. Inputs were made to the ESMF based on discussions at the meeting including the following:

- The need to include vulnerable groups who may be further disadvantaged from the project
- Stressed the need to ensure interventions include fortification/ establishment of perimeter fences in selected schools
- Emphasis on the project not skewed towards any land acquisition for construction rather to expand within existing school premises which could be vertical expansion where space is limited

Enlarged stakeholder consultation was held on 20th November to discuss the identified project risks and mitigation, institutional responsibilities for implementing the ESMF and general E&S procedures. Stakeholders in attendance were representatives from Federal Ministries of Education, Women Affairs & Social Development, Health, representatives of state Ministries of Education, SUBEB, State Ministry of Health, High Level Women Advocate (HILWA), School Basic Management Committee (SBMC), Principals of Girls Secondary Schools, Education sector expert, World Bank Task Team and E&S Specialists. Discussion details are presented in table 18 below.

7.2 Summary of Consultations

The following table provides a summary of consultations in terms of key concerns and responses.

Key Concerns	Response
Inquiry as to the selection criteria for the participating schools and also the beneficiaries of the grants.	It was explained that the states will align with selection based on poverty mapping. More details will be provided as the project design proceeds.
The importance of advocacy and sensitisation campaigns especially amongst religious and traditional leaders was stressed as a critical success factor to address social norms related to Girl child education.	It was reiterated that such awareness campaigns are embedded as key components in the proposed project. Furthermore, the project team has already embarked on a series of robust consultations with all interest groups.
Increase in enrolment may lead to increase in exposure of Girls to sexual harassment and exploitation as they commute to and from school.	There will be sensitization programs for the Girls on risks of GBV/SEA/STIs/STDs. Female teachers, guidance and counsellors, PTA members, Mothers Association etc. will serve as role model and provide monitoring assistance. In addition, a stand-alone GBV assessment is being conducted for the project with detailed action plans to further mitigate such risks.
It was suggested that the project should also support with provision of textbooks.	The project is still at a design phase, though emphasis is on rehabilitation and expansion of structures, however, the recommendation will be documented in the ESMF report.
Concerns on the modalities and effectiveness of the provision of marketable skills, which was emphasised should be useful within the context of the immediate community.	The skills component is being designed in a manner that will provide beneficial skills which is currently not being offered to the Girls. This will also drive on a need's assessment.
With respect to security, stakeholders stressed the need for perimeter fence in all schools to be supported.	This will be looked into in the project design, however, such intervention will be geared at access restriction as opposed to fortified fortress like structures.

Table 9: Summary of Enlarged Consultations with Stakeholders in Kano

Date of meeting	24th October 2019
Venue	NIPEP Office, Kano State Ministry of Education
Participants	Representatives from SME, KSSUBEB, NIPEP, SMoF, Social Mobilisation Officer, SMBC
Purpose of the Meeting	To inform stakeholders of the proposed project, obtain their perception and seek likely environmental and social risks that may be associated with the project
Major Findings and Discussion Areas	<ul style="list-style-type: none"> • The state has a policy on free and basic compulsory education • The state also has a Girls Education Policy • Girls have a lower rate of passing pre-qualifying exams in SS2 and thus some of them drop out as they will be required to pay for the exams for a re-sit • Other factors that lead to low enrolment and retention of Girls include: access to secondary schools, poverty, security/GBV risks, kidnapping, social norms placing no value on education of Girls, early marriage, child labor • There is huge infrastructure adequacy in schools and also inadequate teachers, especially female teachers as they do not want to travel long distances to get to work, also due to the absence of conducive staff quarters

	<ul style="list-style-type: none"> Hygiene and waste management practices in the schools are not environmentally friendly School selection will be based on poverty mapping Major risks from the project will include: social norms not agreeing with the project, grievances based on selection of schools, exposure of Girls to security risks in school and GBV
How Concerns were addressed	<ul style="list-style-type: none"> The identified risks can be addressed by timely and continuous consultations with stakeholders particularly traditional leaders, community leaders, all stakeholders Sensitization of traditionalist, parents on the importance of Girl child education and its benefits to the family should be continuous Formal and non-formal groups will be engaged in monitoring of the Girls to reduce their risks of exposure to social ills The Girls will also be sensitized on risks of GBV/SEA/STIs/STDs, female teachers, guidance and counsellors, PTA members, Mothers Association etc. will serve as role model and guidance also
Recommendations	<ul style="list-style-type: none"> The project should support with provision of textbooks to students Leverage on the success of NIPEP in the State The skills component should synergies with IDEAS project, also World Bank funded Non-formal monitoring groups should be strengthened including SBMCs, Mothers Association etc. this could be in the form of training, incentives, monitoring tools etc. Incentives should be provided for female teachers to go to the rural areas The identified risks can be addressed by timely and continuous consultations with stakeholders

Table 10: Meeting with Rep of Women Affairs and Mothers Association

Date of meeting	24th October 2019
Venue	NIPEP Office, Kano State Ministry of Education
Participants	Representatives from Women Affairs, Mothers Association
Purpose of the Meeting	To inform them of the proposed project, obtain their perception and understand the roles they will play in addressing social risks in the project
Major Findings and Discussion Areas	<ul style="list-style-type: none"> The Ministry of women affairs has been collaborating with Ministry of education with issues pertaining to Girl child education and the protection of the Girl child. Mothers association play a key role in sensitizing parents to allow their wards go to school to create opportunity for a better future for them. Though most of their work is voluntary, they are made of mothers within the local communities They also informed the team that pressure on early marriage, poverty, less emphasis on Girls education are major factors contributing to low enrolment and retention of Girls in school. The Girls themselves need to understand the importance of getting an education Major risks from the project will be if the Girls need to travel long distances to school which might expose them to social risks like GBV/SEA, kidnapping etc. Lack of synergy and cooperation amongst the state actors may impede the success of the project
How Concerns were addressed	<ul style="list-style-type: none"> The identified risks can be addressed by setting up the Girls in groups to commute together to and fro school Non-formal groups will be engaged in monitoring of the Girls to reduce their risks of exposure to social ills The Ministry of Women Affairs will also play an oversight role to ensure that Girls are not exploited as a result of the project The Ministry of Education and Women Affairs should synergies to ensure the success of the project and that the benefits are achieved. Capacity building on roles and

	responsibilities will be conducted during preparation and implementation phases of the project
Recommendations	<ul style="list-style-type: none"> • Non-formal monitoring groups should be strengthened including SBMCs, Mothers Association etc. this could be in the form of training, incentives, monitoring tools etc. • Conditional Cash transfer money should not be given to the Fathers as they may not use it for the intended purpose

Table 11: Consultations in Secondary Schools

Date of meeting	24th October 2019 & 25th October 2019
Venue	Government Girls Secondary School, Yargaya, Kano State Government Girls Secondary School, Sabon Gari, Kano State Government Girls Secondary School, Panisan, Kano State
Participants	School Management, Teachers, Representatives from SME, SUBEB, Women Affairs, Mothers Association
Purpose of the Meeting	To inform them of the proposed project, obtain their perception and understand the current issues with respect to Girl Child education and the status of facilities in the schools
Major Findings and Discussion Areas	<ul style="list-style-type: none"> • The number of classrooms in some of the schools are not adequate for the number of students in the class thus overcrowding the classes • There are no chairs and tables in many of the classes and Girls have to receive lectures on the floor • Inadequacy of female teachers as most of them do not want to travel long distances to school to teach • The facilities in the schools are dilapidated and inconducive for effective learning including the classrooms and hostels • Toilets are in very poor conditions, grossly inadequate for the number of girls in the school, no attached water facility to the available toilets, and for the boarding schools the location of the toilets are remote, unsecure and unkept. Previous interventions did not do a good job in the renovation of toilets as most of them are back to poor states. • Waste is poorly managed, mainly by open dumping and open burning. Sewage on the other hand is usually evacuated by informal handlers who dispose them off at nearby lands for use as manure • The project is a welcome development and setting up of skill centers should be based on the peculiar needs of the project environment to ensure that these skills are marketable afterwards. Some skills mentioned include catering, wedding decoration, tailoring, poultry, fisheries, leatherworks • The major envisaged project risks are driving up enrolment without provision of matching facilities • Security risks and harassment of the Girls
How Concerns were addressed	<ul style="list-style-type: none"> • The project is planning to intervene in renovation/construction of additional facilities in the school which will be done prior to enrolling beneficiaries • The school management will work with the SME/SUBEB to draw up a work plan that will identify what is feasible and what is not for each school • On security risks, Government and volunteer groups will serve as monitors to prevent social ills that may be associated with the project. On the other hand, Girls will be sensitized on safe practices, GBV/SEA/STIs/STDs • A GBV-GRM will also be put in place at the project locations
Recommendations	<ul style="list-style-type: none"> • Female teachers should be given transport allowance and other incentives to encourage them to teach in rural areas

Table 12: Consultations with Stakeholders in Ekiti State

Date of meeting	30th October 2019 & 31st October 2019
Venue	Office of the Permanent Secretary, State Ministry of Education, Ekiti State Ministry of Education, Conference Hall
Participants	Technical Adviser, Representatives from SME, SUBEB, Women Affairs, Gender Desk Officer, Director Schools. SEPIP Coordinator and other representatives of SEPIP, Director School of Basic Studies, Surveyor
Purpose of the Meeting	To inform stakeholders of the proposed project, obtain their perception and seek likely environmental and social risks that may be associated with the project
Major Findings and Discussion Areas	<ul style="list-style-type: none"> • There has been political interest of the Governor’s wife on Girl child education and development and some laws relevant to this are in discourse in the state e.g. reintegrating pregnant girls back to school • Girls’ schools are not enough in the school to cater for the needs of Girl education. Many schools can only admit one third of the applicants because of the limited facilities available in the school • Girls have to travel long distances to school which exposes them to men that take advantage of them including Okada riders who offer them free transport. • Poverty, when parents cannot afford fees or transport money to school also leads to drop-outs • The major challenge with Girls retention rate in schools is early pregnancy rates • Other factors that lead to low enrolment and retention of Girls include: harassment of Girls, sexual exploitation, more emphasis on educating boys in poorer homes • Hygiene and waste management practices in the schools are not friendly and Girls are often harassed when trying to use these facilities • School selection will be based on need and spread across the senatorial districts • The state requests that in addition to renovation of existing schools, more schools should be built across the state to promote access in line with the state policy of students not traveling beyond 1km to get to school • Project risks may include: <ul style="list-style-type: none"> - Land acquisition for construction of new schools - Availability of space for expansion in existing schools - Exposure of more Girls un-monitored as they traverse to and for school especially for day schools. Harassment from cultists - Boys may feel disadvantaged by not benefiting from the project - Sustainability of the free education policy and the intervention beyond the project lifecycle
How Concerns were addressed	<ul style="list-style-type: none"> • Land acquisition will be avoided as much as possible, but where it cannot be totally avoided it will be minimal and the provisions of the RPF will be adopted in developing and implementing site specific RAPs • Preferable expansion may be more of vertical structures than horizontal structures in locations with limited space • Monitoring groups will be empowered to monitor the Girls movement and conduct of community members including Neighborhood Inspectors, PTA, community Development Officer, Area Education Officers amongst others. Girls Clubs could also be formed to enable peer monitoring. Women Affairs will collaborate with the SME Gender desk to implement sensitization programs on sexual education, GBV/SEA, health talks, provision of sanitary kits to Girls etc. • Consultations should also be carried out with Boys so they feel carried along, they will also benefit from renovation of classrooms, hygiene facilities in co-education schools

	<ul style="list-style-type: none"> The project will continue to liaise with Government to ensure political will and funds allocation for the sector
Recommendations	<ul style="list-style-type: none"> The state would develop a work plan for the sector which will be aligned with the objectives of the proposed project. The state should leverage on the success of SEPIP and the proposed IDEAS project

Table 13: Consultation in Schools in Ekiti State

Date of meeting	31st October 2019
Venue	Immaculate Girls Secondary School, Ekiti State St Louis Girls Secondary School, Ekiti State
Participants	School Management, Teachers, Representatives from SME, SUBEB, Women Affairs
Purpose of the Meeting	To inform them of the proposed project, obtain their perception and understand the current issues with respect to Girl Child education and the status of facilities in the schools
Major Findings and Discussion Areas	<ul style="list-style-type: none"> The number of classrooms are grossly inadequate and schools cannot take more than 30% of Girl applicants The environment is untidy as they do not have lawn mowers to cut the grass around the school The facilities in the schools are dilapidated and inconducive for effective learning including the classrooms and hostels. Insufficient beds in the hostels and no staff quarters Toilets are in very poor conditions, grossly inadequate for the number of girls in the school, no attached water facility to the available toilets Skills centers are not functional and not adequate for the number of Girls interested in participating Waste is poorly managed, mainly by open dumping and open burning. The project is a welcome development and setting up of skill centers should be based on the peculiar needs of the project environment to ensure that these skills are marketable afterwards. Some skills mentioned include catering, wedding decoration, tailoring, ICT, honey making The major envisaged project risks are: <ul style="list-style-type: none"> Security risks from weak fences that allows hoodlums climb into the school Traffic increase and risk of student accidents for schools in built up areas Increase in waste burden from increased enrolment Exposure of more Girls to sexual harassment both in and out of school Change in Government policy may not favor the project
How Concerns were addressed	<ul style="list-style-type: none"> The project is planning to intervene in renovation/construction of fence in the participating schools. CCTV cameras can be put in schools where possible and additional security measures should be provided for the schools The PIU will ensure that the school management/contractors work with the State Traffic Management Agencies to control traffic, assist with student crossing and prevent accidents All contractors will develop waste management plans prior to commencement of construction. Modern incinerators can be provided as part of the project to manage waste in the operation phase. Waste to wealth schemes can also be embedded as part of the proposed entrepreneurship programs. The project will invest in Eco toilets and VIP latrines as they are easier to manage especially where water availability is limited A GBV-GRM will also be put in place at the project locations. Monitoring will be done by both formal and non-formal groups

Table 14: Consultations with Female Students in Ekiti State

Date of meeting	31st October 2019
Venue	St Louis Girls Secondary School, Ekiti State
Participants	Girl Students
Purpose of the Meeting	To understand the issues Girls, face in school and their perception about the project
Major Findings and Discussion Areas	<ul style="list-style-type: none"> • They need more classes and more toilets in the school • The Girls prefer female teachers to male as they relate with them easily and they advise them • On skills acquisition the Girls mentioned preference for tailoring, hair dressing, home decoration • Generally, Girls prefer boarding school to day schools • With respect to management of their used sanitary pads: they wrap them up and dump them in a space designated for frequent burning • The Girls attested to receiving sensitization on sexual health, hygiene and sanitation from ex-students, NGOs and Ministries
Recommendations	Girls should be duly consulted in project design as this will make the project interventions more useful and sustainable

Table 15: Stakeholders Workshop Key Discussions

Date of meeting	20th November 2019
Participants	Representatives from Federal Ministries of Education, Women Affairs & Social Development, Health, representatives of state Ministries of Education, SUBEB, State Ministry of Health, High Level Women Advocate (HILWA), School Basic Management Committee (SBMC), Principals of Girls Secondary Schools, Education sector expert, World Bank Task Team and E&S Specialists
Purpose of the Meeting	To discuss the ESMF with stakeholders, specifically, project risks and mitigation, institutional roles for ESMF implementation and E&S procedures
Key Discussion Areas	<ul style="list-style-type: none"> • The Nigerian EIA procedures and the World Bank Environmental and Social Framework was explained to stakeholders and the need for the ESMF to identify and address inherent project E&S risks • Stakeholders raised concerns on the fact that some states have not domesticated important legislations like the Child's Right Act, National Policy on Girl Child Education and that it will be important for intending states to take this seriously. A representative from the Federal Ministry of Women Affairs reiterated the Minister's commitment to see that these laws are domesticated in all states. • The market skills will be beneficial to the entire school and not just the Girls selected as Grant beneficiaries • The representative from women affairs stated that Female Genital Mutilation should also be considered as a barrier to adolescent Girl education. The TTL stated this will be considered under the stand alone GBV assessment as such areas require expert assessment. • The need for a grievance redress mechanism for the project was also reiterated. GRM will be made accessible to the project beneficiaries and the participating Girls. A GRM will also be established for project workers in line with the Labor Management Procedures (LMP). The SPIUs will monitor the grievance process and ensure all complaints are listened to, documented, investigated and closed. In addition, a corrective action plan should be developed for recurring grievances.
Recommendations	A sector expert, Prof Oladipo reiterated the need for a project sustainability plan which will be based on the principles of equity, social cohesion, Governance structure, and gradual integration of the project into the state plan before the end of the project.

7.3 Pictures of Stakeholders Consultations



Plates 12: Consultations with Stakeholders in Kano



Plates 13: Consultations at GGSS, Panisan, Kano



Plates 14: Site Visit at GGSS, Yargaya, Kano



Plates 15: Consultations with Rep of Women Affairs, Mothers Association, Kano



Plates 20: Consultations with PTA in Immaculate Girls School, Ekiti



Plates 21: Consultations with Stakeholders in Ekiti State

CHAPTER EIGHT: GRIEVANCE REDRESS MECHANISM

8.1 Introduction

This section presents the Grievance Redress Mechanism developed to address in clarity and predictability how grievances, complaints, and concerns will be received, assessed, sorted, resolved, and monitored in line with the project. Some examples of potential concerns include:

- Grievances may arise from any of the following: involuntary resettlement and compensation issues gender-based violence/SEA issues
- exclusion from project benefits and non-compliance of the contractor to the agreement reached with RAAMP or the community
- Poor construction waste handling
- lack of alternative route for movement during construction, etc.

A Grievance Redress Mechanism (GRM) will be implemented to ensure that all complaints from local communities are dealt with appropriately, with corrective actions being implemented, and the complainant being informed of the outcome. It will be applied to all complaints from affected parties. The SPIU will maintain a Complaints Database, which will contain all the information on complaints or grievances received from the communities or other stakeholders. This would include: the type of complaint, location, time, actions to address these complaints, and final outcome. The Social officer in the PIU will oversee that the framework will function properly. The functioning of the GRM system, how to register complaints (written, by phone, or in person), where to go and hours of service, all should be clearly explained in local languages during public consultations on the project.

8.2 Grievance Redress Committees

The PIU shall set-up grievance redress committees that will address any complaints during project implementation. This will be treated in two folds; 1) GBV related GRM and 2) non GBV related GRM.

A classified procedure for confidentiality is required in the cases of GBV and thus, a GBV risk management plan will be prepared as part of the stand-alone GBV assessment and action plan for this. Grievance Redress Committees (GRCs) shall be constituted at various levels to implement the GRM for the project including community level, PIU level, FPCU level, Judiciary as shown below.

First Level GRM: GRC at the Site/Community Level: Composed at the school/community level, easily accessible to the school/community people. This will comprise of school principal, PTA chairman, Guidance Counselor, community leader shall be part of the committee among other identified persons. This committee will be expected to receive and document all complaints received in the Grievance Log Book. The committee will investigate all project related complaints and resolve/provide responses. Where the issue cannot be resolved at this level it will be referred to the SPIU. In addition, complaint box will be placed within the school and in strategically accessible location in the nearby community to the school, such as markets, civic center's etc. that will encourage aggrieved

parties drop their complaints. The SPIU will put in place a mechanism to access these complaint boxes at least twice weekly and attend to complaints. Designated phone numbers to receive complaints will also be provided at the project site, all complaints received will be documented. Recurring complaints should be flagged by the GRCs and the SPIU should develop a corrective action plan, implement and close the process.

Second Level of GRM: GRC at the SPIU Level: This committee shall comprise of PIU members including the Project Coordinator, Social Officer among others, and other state level representative from within the State Project Monitoring Committees. If the complainant does not accept the solution offered by the SPIU-GRC, then the complaint is referred by the State Project Coordinator to the FPCU. In all cases, there must be a feedback process until the complaint is closed. Recurring complaints should be flagged by the GRCs and the SPIU should develop a corrective action plan, implement and close the process.

Third Level of GRM: GRC at the FPMU Level: The Federal Project Coordinating Unit (FPCU) will be required to intervene in grievances beyond the state level resolution.

Court Redress of Grievances: While the purposes of GRM put in place by this Project is to resolve all issues caused by the project implementation out of court and to save time which is usually involved in litigation matters, it is not out of place to anticipate a scenario where aggrieved person is not satisfied with the process and judgment given by the grievance redress committee(s). Therefore, SPIU shall inform aggrieved persons of their right to seek for redress in the court of law as the final resort.

The Grievance Redress Committee will be responsible for:

- Communicating with the affected persons (AP's) and evaluate if they are entitled to compensation;
- Making the list of affected persons public and the established grievance redress procedure;
- Recommending to the Social Officer of the PIU solutions to such grievances from affected persons;
- Communicating the decisions to the AP's;
- Acknowledging appeals from persons, households or groups who rightfully will not be affected by the project, but claim to be; and
- Recommending to the SPIU whether such persons should be recognized as AP's, and to communicate back the decisions to the Claimants.

8.3 Expectations When Grievances Arise

When people present a grievance, any of the followings is or are expected from the project management/channel of grievance resolution by the local people:

- acknowledgement of their problem;
- an honest response to questions/issues brought forward;
- an apology, adequate compensation; and
- Modification of the conduct that caused the grievance and some other fair remedies.

8.4 Typical Grievance Redress Process

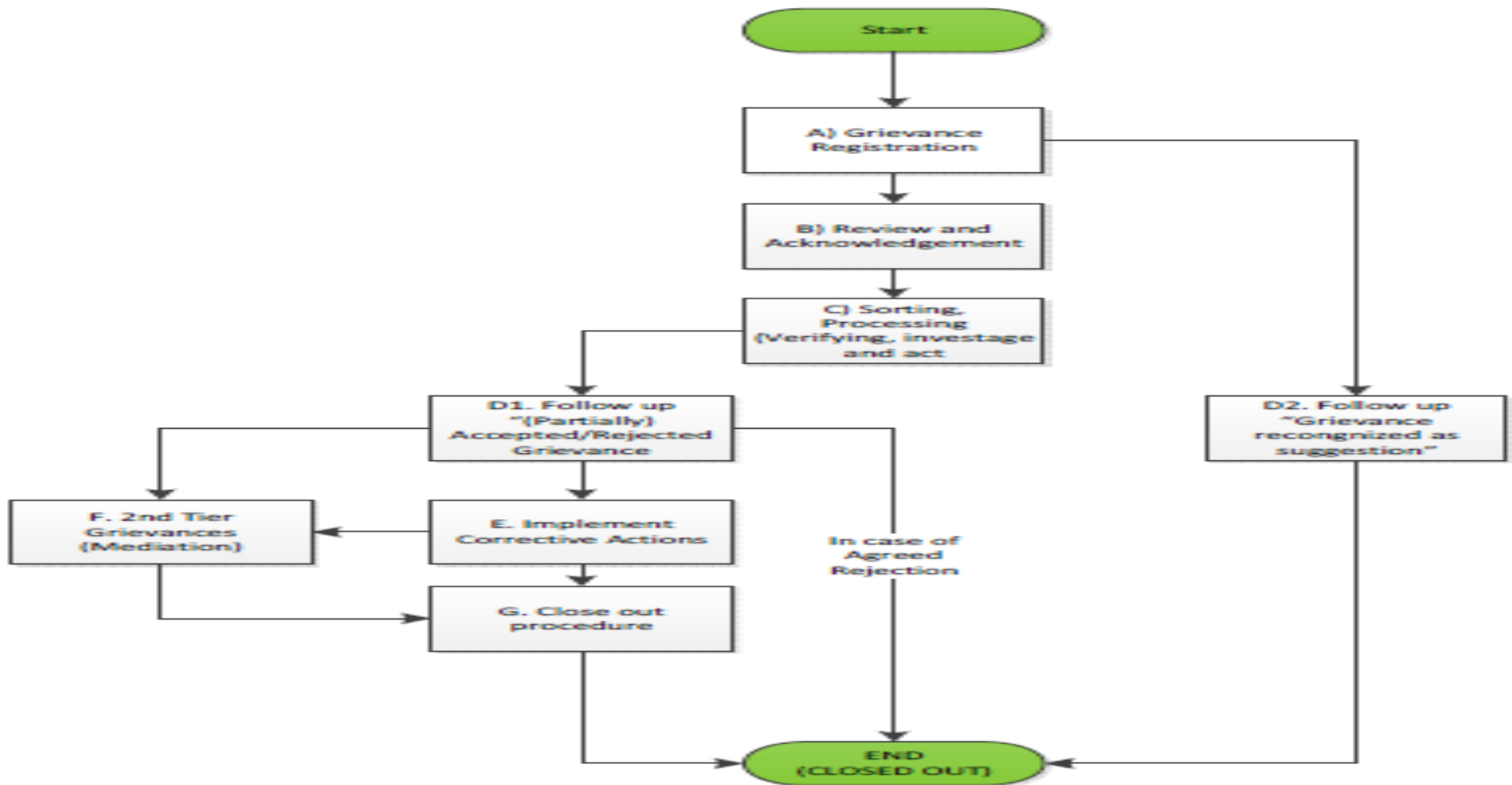
The process of grievance redress will start with registration of the grievance(s) to be addressed, for reference purposes and to enable progress updates of the cases. Thus, the person affected by the project will file a complaint with the Grievance Redress Committee. The complaint should contain a record of the person responsible for an individual complaint, and records dates for the date the complaint was reported; date the Grievance Log was uploaded into the project database; the date information on proposed corrective action was sent to complainant (if appropriate), the date the complaint was closed, and the date response was sent to complainant.

The officer receiving the complaint (part of the GRC) will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The response time will depend on the issue to be addressed but it should be addressed with efficiency. The Grievance Committee will act on it within 10 working days of receipt of grievances. If no amicable solution is reached, or the affected person does not receive a response within 15 working days, the affected person can appeal to the SPIU, which should act on the grievance within 15 working days of its filing. These timelines are further illustrated in table 14 below:

Table 16: Typical Steps in a Grievance Redress Process

Steps	Process	Description	Completion Time frame	Responsible Agency/Person
1	Receipt of complaint	Document date of receipt, name of complainant, village, nature of complaint, inform the SPIU	1 day	Secretary to GRC at project level
2	Acknowledgement of grievance	By letter, email, phone	1-2 days	Social officer at SPIU
3	Screen and Establish the Merit of the Grievance	Visit the site; listen to the complainant/community; assess the merit	5-10 days	GRC & social officer & the aggrieved PAP or his/her representative
4	Implement and monitor a redress action	Where complaint is justified, carry out resettlement redress in line with the entitlement matrix/OP 4.12	14 days or at a time specified in writing to the aggrieved PAP	PC-PIU and Social Officer
5	Extra intervention for a dissatisfied scenario	Review the redress steps and conclusions, provide intervention solution	10 days of receiving status report	State Project Coordinator
6	Judicial adjudication	Take complaint to court of law	No fixed time	Complainant
7	Funding of grievance process	GRC logistics and training, redress compensation, court process	No fixed time	The proponent

*All complaints including anonymous ones must be registered, treated and responded to.



8.5 GBV-GRM

Based on the substantial GBV risk profile of the project as well as the vulnerable population the project wishes to target (adolescent girls), a separate GBV related GRM will be constituted to receive GBV related complaints that is tailored to be sensitive to the sensitivities of reporting GBV and for vulnerable population. The GBV-GRM composition must be sensitive to create safe-space for reporting grievances. The GRM should primarily serve to refer complaints to the GBV service provider and record resolution of the complaint. GBV-GRM formation and procedures will be elaborately treated in the stand-alone project GBV assessment, however, the GRM will operate under the following principles:

- The project GBV specialist will make certain the availability of an effective grievance redress mechanism (GRM) for GBV with multiple channels to initiate a complain
- Refer cases where needed and work with GBV Services Providers as entry points into service provision to raise awareness of the GRM
- Provide essential services and referrals for survivors, based on the GBV mapping of services documented
- Report case through the GRM as appropriate keeping survivor information confidential and anonymous
- Cases brought through the GRM are documented and closed.

A stand-alone GBV assessment is been conducted for the project with an action plan which will also contain a GRM process for GBV related issues, however, a recommended framework for the Girl student to report such issues is stated as follows, this can be built on/modified in the GBV assessment.

First Level GBV-GRM: GRC at the School	Any Girl with GBV/SEA, sexual harassment complaints should report to the Guidance Counselor in the school. The guidance counsellor must be a qualified person trained on survivor-centered approach mechanism with links to referral services, and a safe space for consultation with the Girls. The Guidance Counsellor should report the matter to the school principal in a manner that will protect the Girl and ensure confidentiality at all times. The matter should not be discussed at any open forum like PTA meeting or school management meetings.
Second Level of GBV-GRM: GRC at the State Level	Where the matter cannot be resolved at the level of the Guidance counsellor/Principal, it should be referred to the Gender desk of the State Ministry of Education. Protection and confidentiality for the complainant should be guiding principles in handling the case. Recurring issues from a particular school should be flagged, investigated, the SME/Women Affairs to develop and implement a corrective action plan.
Third Level of GBV-GRM:	The Gender desk of the state ministry of education can liaise with the state ministry of women affairs and collaborate to resolve the issue and involve referral services or law enforcement as deemed necessary. Psychosocial counselling and other necessary support should be provided to the survivor to ensure completion of education. It is important that the identity of the Girl is protected at all levels.

CHAPTER NINE: LABOR MANAGEMENT PROCEDURES

9.1 Introduction

This Labor Management Plan (LMP) was developed by the Federal Ministry of Education (Federal Project Management Unit) for the Adolescent Girls Initiative for Learning and Empowerment Program. It identifies labor requirements and sets out the procedures for addressing labor conditions and risks associated with the proposed project, which is aimed at helping the project to determine the resources necessary to address project labor issues. The LMP is enshrined within the context of the World Bank ESS 2: Labor and Working Conditions.

The risks and impact associated with workers as well as community health and safety, and the risk associated with labor impact are moderate due to the nature of minimal construction activities which are well understood and expected to have limited impacts as they can largely be avoided, minimized or managed through procedures, including procedures set out in this LMP. The LMP will be reviewed continually during project implementation and adequate measures and procedures to manage negative impacts will be put in defined. A detailed stand-alone Labor Management Procedures (LMP) has been developed for the project, however, key provisions are captured within this section.

9.2 Characterization of labor requirements

For the Adolescent Girls Initiative for Learning and Empowerment Program, there will be various categories of direct and indirect staff and workers. The main labor and staff required in the project will include:

- Staff of the Federal Project Coordinating Unit and the State Project Implementation Units
- Staff of the sub agencies/departments that will be participating in the project
- Teachers in schools
- Contract workers brought in to rehabilitate the schools
- Primary Suppliers
- Community Workers

The table below highlights and analyses the potential labor related risks and impacts in view of the anticipated labor utilization and general baseline settings of the project area.

9.3 Labor Risk Identification and Analysis

Table 17: Labor Risk Identification and Analysis

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Mitigation
Arbitrary decisions by contractors on terms and	<ul style="list-style-type: none"> • The duration of the contracts offered to contractor workers are short and may not allow employees adequate time and information for meaningful 	<ul style="list-style-type: none"> • The State Project Implementation Unit (SPIU) will closely supervise the Contractor Recruitment Plan and ensure fairness of Employment Terms and

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Mitigation
conditions of employment	collective bargaining, leading to discontent of employees and disputes. <ul style="list-style-type: none"> • Project workers may not be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. 	Conditions against the applicable and prevailing National stipulations <ul style="list-style-type: none"> • All information and documentation must be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur • Where applicable, project workers will receive written notice of termination of employment and details of severance payments in a timely manner
Poor working conditions (unsafe work environment, underpayment, lack of workers' rights, etc.)	<ul style="list-style-type: none"> • The Rights of workers under national labor and employment law (which will include any applicable collective agreements), may be abused • Workers payment may be delayed, irregular, or may be underpaid. • Campsites may be poorly managed, unconducive for workers, insecure, poor sleeping conditions, lack of access to basic amenities like water, toilets, healthcare etc. • The general appearance of the camp deteriorates making camp life unpleasant 	<ul style="list-style-type: none"> • Project workers will be paid on a regular basis as required by national law and labor management with a principle of "equal pay for equal work" • In the case of subcontracting, the Borrower will require such third parties to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors • The SPIU shall inspect the campsites to ensure workers have appropriate living quarters, sanitation facilities separate for male and female, basic amenities • All project workers will be provided with adequate periods of rest per week, annual holiday and sick leave, as required by national law. • Ensure that camp grounds and common areas are routinely cleaned and organized with appropriate signage in place, and that grounds are maintained (e.g., grassed areas are regularly mown).
Non-discrimination and equal opportunity	<ul style="list-style-type: none"> • Decisions relating to the employment or treatment of project workers may discriminate against certain classes of workers including women, vulnerable groups amongst others. • Payment of workers may be based on discrimination e.g. male may be paid higher than women even on the same level of job schedule. • Foreign workers may be treated better than local workers in terms of living 	<ul style="list-style-type: none"> • The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment,

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Mitigation
	<p>conditions, unequal pay, varying closing time etc. even when they are on the same level of qualification and experience</p>	<p>promotion, termination of employment or retirement, or disciplinary practices.</p> <ul style="list-style-type: none"> • The SPIUs are compelled to safeguard the interests of women and girls, including gender parity at the workspace, appropriate sanitation facilities at workplace and appropriate PPEs for women.
Sexual Harassment of teachers	<ul style="list-style-type: none"> • The project will provide support packages to recruited teachers to ensure that they are qualified and ready to teach in the target communities; including short-term placements • Risks of sexual harassment of teachers and other staff is a possible 	<ul style="list-style-type: none"> • The Teacher-Counsellors appointed to carry out the life-skills facilitation should be selected as focal points for reporting incidents of harassment; alternate or secondary focal points should be identified in case the accused is the Teacher-Counsellor • Training administered to teachers should include protocols on how sexual harassment will be addressed at the school, including if its escalated beyond the school environment • Teachers should also be made aware of the GBV-GRM for the project
Child Labor	<ul style="list-style-type: none"> • There is a risk that children (below the age of 18) will be used as labor in the project. • Under-aged persons within the community may be disguised as above 18 to enable them to work and get paid 	<ul style="list-style-type: none"> • The minimum age of eighteen (18) will be enforced at recruitment and in daily staff team talks by Contractors. SPIU will also supervise this through the Contractor Management Checklist. • Contractors will liaise with community liaise to attest to the age and conduct of all local hires, and maintain a list of same • Hired project workers above 18 shall conduct his/her activities in ways that are not detrimental with respect to education or be harmful to the child's health or physical, mental, spiritual, moral or social development
Forced Labor	<p>There is a risk that there could be involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This prohibition covers any of the aforementioned.</p>	<ul style="list-style-type: none"> • Contractors will ensure that no forced labor exists in the project by gathering documents and appropriate proof. • A consent section will be part of the employee signed employment contract. Contractors will ensure that if labor is sourced from any sub-contracting agency, the workers are not subject to coercion and forced labor conditions.

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Mitigation
Labor Influx	<ul style="list-style-type: none"> • The project may face influx of labor to local communities especially where skilled laborers are not available in some project sites. This could lead to Increase in potential spread of STIs/STDs, HIV/AIDs due to workers on site, increase in GBV/SEA especially for Girls been exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encourage presence of sex workers in the project communities • This could also lead to competition for resources like water, health facilities, electricity in the project locations 	<ul style="list-style-type: none"> • Encourage hiring of labor from the host communities. Maintain labor relations with local communities through a code of conduct (CoC) • The Code of Conduct must be signed by all categories of workers. Workers must be trained on the provisions of the CoC about refraining from unacceptable conduct toward local community members, specifically women and informed of the sanctions for non-compliance. Training must be conducted for all new hires including sub-contractors. • Contractors should make resources available for their workers especially where stated in the ESMP
Grievance Mechanism	<ul style="list-style-type: none"> • Workers may be aggrieved due to unfair treatment, poor working conditions, conflicts, poor pay, overstretched working hours amongst other things. • A GRM will be designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and will operate in an independent and objective manner • The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law 	<ul style="list-style-type: none"> • Contractors shall comply with the Grievance redress mechanism defined to handle workers grievances in a fair and timely manner. • The SPIU shall provide oversight to ensure effective implementation of the GRM.
Occupational Health and Safety	<ul style="list-style-type: none"> • Site workers will be exposed to risks of accidental collisions with moving vehicles, strains, and ergonomics from repeated movements or from lifting and heaving of heavy objects, slips and falls. Accidental cuts from tools and machines are also safety risks. • Dust and particulate emissions and welding works from rehabilitation site may cause respiratory and eye 	<ul style="list-style-type: none"> • Contractors should provide HSE training for all workers before commencement of work and periodically • All contractors should have full time HSE officers on their team • Contractors should provide adequate PPEs for all their workers and the contractors HSE officers should enforce compliance

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Mitigation
	<p>impairment health concerns for workers and the public</p> <ul style="list-style-type: none"> • Movement of trucks carrying sand and materials, lack of road safety measures may also cause risk of accident, injury and death • Contractors should comply with National and international labor legislations • Every site will have emergency prevention and preparedness and response arrangements to emergency situations • Maintain a safe working environment including workplaces, machinery, equipment and processes under their control are safe and without risk to health, including by use of appropriate measures relating to chemical, physical and biological substances and agents. • Where required, hire security for workers 	<ul style="list-style-type: none"> • First aid boxes should also be provided at construction site, staging area and mobile • Contractors will prepare Occupational Health and Safety Plans • Contractors should report OHS accident/incidents to the SPIU promptly, and the SPIU/FPMU should report this to the Bank within 48hrs (in accordance with the Environmental and Social Commitment Plan (ESCP) • Contractors waste management plans will include handling and management of hazardous waste • Contractors should ensure training for their drivers and liaise with the State Traffic Management Agency to control traffic during project implementation
Right of Association and Collective Bargaining	<ul style="list-style-type: none"> • Workers have the right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker • Workers have a right to organize and collective bargaining, and representation 	<ul style="list-style-type: none"> • The SPIU will ensure that workers are informed of their right of association and collective bargaining • The SPIU should also inform workers of the workers GRM and their right to utilize the system
Contractor Management	<ul style="list-style-type: none"> • Records of workers engaged under the Project, including contracts must be kept • Records of all training attended by workers including CoC, HSE, STIs/STDs, GBV etc. • Accidents/ incidents and corresponding root cause analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (Corrective Action Register) • Records of strike actions, reasons and resolution reached 	<ul style="list-style-type: none"> • Documents should be kept at the site office with the site engineers and SPIU office • The FPCU team should check these records during monitoring visits

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Mitigation
	<ul style="list-style-type: none"> • Records of grievances and how they were resolved • Records of all sanctions, punishments and terminations with reasons and follow-up actions taken 	
Primary Suppliers	Primary suppliers could also have occupational injuries, incident/accidents while performing project related functions	Primary suppliers should maintain records related to occupational injuries, illness and lost time accident, which should be reviewed by the contractor every quarterly
Discipline and Termination of Employment	<ul style="list-style-type: none"> • Disciplinary process should be laid out before commencement of work and explained to every worker • Termination of appointment should abide by the following principles: <ul style="list-style-type: none"> ✓ Valid or reasonable; ✓ Clear and unambiguous; ✓ The employee is aware, or could reasonably be aware of the rule or standard; and ✓ The procedure to be applied in the event the employee contravenes any of these rules 	<ul style="list-style-type: none"> • The SPIU should periodically review workers disciplinary and termination processes to ensure that they are executed fairly and without prejudice • Where unfair treatment is established the SPIU should put in place corrective action and follow up to ensure execution

Occupational Health and Safety Compliance

The requirements of the Environmental and Social Standard 2 on Occupational Health and Safety will be to carry out site specific risk assessments and develop appropriate risk prevention and mitigation measures. Where risk prevention and mitigation require provision of personal protective equipment (PPE), appropriate PPE will be provided to workers who are tasked to work on high risk tasks or areas. During risk assessment which will be conducted during screening process, possible hazards or risks related to the project activities will be identified. To this end, the appropriate PPE will be provided during project implementation. The identification of PPE will be done during the screening and development of site-specific environmental and social management plans (ESMPs).

9.4 Grievance Redress Procedures for Workers

This procedure requires every employer, including contractors, to have a Formal Grievance Procedure which should be known and explained to the employee.

The framework to be adopted for workers to lodge their grievances is outlined below:

First Level GRM: GRC at the Site/Community Level	Composed at the community level and easily accessible to workers. This committee will comprise of community liaison officers, supervision consultant site engineer, representative of school management among other identified persons. In addition, complaint box will be placed in the school that will encourage aggrieved workers drop their complaints. This should be checked regularly (at least twice weekly) by a designated person in the committee. This committee will be expected to report to the SPIU.
Second Level of GRM: GRC at the SPIU Level	This committee shall comprise of PIU members including the Project Coordinator, Social Officer among others, and other state level representative from within the State Project Monitoring Committees. If the complainant does not accept the solution offered by the SPIU-GRC, then the complaint is referred by the Sate Project Coordinator to the FPCU
Third Level of GRM: GRC at the FPMU Level	The Federal Project Coordinating Unit (FPCU) will be required to intervene in grievances beyond the state level resolution.
Court Redress of Grievances	While the purposes of GRM put in place by this Project is to resolve all issues caused by the project implementation out of court and to save time which is usually involved in litigation matters, it is not out of place to anticipate a scenario where aggrieved person is not satisfied with the process and judgment given by the grievance redress committee(s). Therefore, SPIU shall inform aggrieved persons of their right to seek for redress in the court of law as the final resort.

9.5 Roles and Responsibilities for Managing the LMP

The State Project Implementation Units (SPIUs) have the overall responsibility to oversee all aspects of the implementation of the LMP including occupational safety, health and welfare of workers, and ensure contractor compliance. The SPIUs will address all LMP aspects as part of procurement for works as well as during contractor induction/training. This role will primarily be part of the responsibilities of the Environmental and Social Officers of the SPIUs, however, they will be required to liaise with other staff of the SPIU and report frequently to the Project Coordinator on all LMP matters.

Contractors will be responsible for implementation of the plan on a daily basis and providing the required human, financial and training resources for effective compliance. However, implementation of the project will be done in collaboration with several other stakeholders at national, state, schools and community level who will also be expected to assist in the management of workers within their areas of jurisdiction in the project

Specific roles are outlined below:

Occupational Health and Safety

Contractors must engage a minimum of one Health Safety and Environment (HSE) officer in every team to ensure the day-to-day compliance with specified health and safety measures and records of any incidents. Minor incidents and near misses will be reported to the SPIUs (through the SPIU Environmental Officer) on a monthly basis, serious incidents should be reported immediately and not later than 24hrs.

Minor incidents will be reflected in the quarterly reports to the World Bank, while major accidents/deaths should be flagged to the World Bank within 48hrs.

Labor and Working Conditions

Contractors will keep records in accordance with specifications set out in this LMP. The SPIUs may at any time require records to ensure that labor conditions are met. Where issues are spotted, the SPIU will ensure that immediate remedial actions are implemented. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

Worker Grievances

Contractors must engage a minimum of one social officer in every team to handle issues relating to social risks. The SPIUs (through the social officer) will review the effectiveness of the workers grievance redress mechanism as stipulated in section 9.4 above and ensure that all complaints by workers are resolved. The SPIU will report this as part of the quarterly E&S reports to the World Bank.

Additional Training

The contractor will set up a system of daily HSE PEP talks, routine safety trainings and specialized job trainings for workers. Trainings will form part of the contractor's responsibility. The contractors HSE officers will provide safety instructions to contractor staff. The SPIU will liaise with contractors to deliver trainings to address risks associated with labor influx including GBV/SEA. The contractor will be obligated to make staff available for this training, as well as any additional mandatory trainings required by the SPIU, as specified by the contract

Occupational Health and Safety compliance

The contractor shall comply with all provisions of the LMP, site-specific ESMPs that will be prepared, including occupational health and safety plans, emergency plans amongst others. In addition, contractors shall procure the identified PPE and First Aid kit for use during project implementation and these will be included in the Bill of Quantities (BoQs). The Contractor shall organize training for workers on the use of PPE and First Aid kit. It is also expected that every contractor will have an HSE Manual which will demonstrate the company's personnel commitments to HSE compliance.

CHAPTER TEN: SUMMARY AND RECOMMENDATION

This ESMF has provided a general view of the environmental and social conditions under which the Project will be implemented. This ESMF addresses the Project's need to monitor and mitigate negative environmental and social risks and impacts of the project and promote sustainability. This report is necessary at this point of project preparation to inform decision making on project design and modalities for implementation in such a way as to minimize identified risks and negative impacts.

As described in the report, labor influx is likely to aggravate GBV/SEA issues. Contractors must prepare and sign all levels of CoCs requested and present a C-ESMP that specifically addresses the aforementioned. The submission and acceptance of the C-ESMP is a mandatory process, essential prior to the commencement of any form of civil works. The SPIU is responsible for monitoring compliance to the E&S requirements.

The Labor Management Procedures set out in this ESMF will also be monitored by the SPIU to ensure protection and fairness for all categories of workers associated with the project.

For Physical and Cultural aspects which may be impacted on; the SPIU and its Contractors should have effective collaboration and liaison with the communities. Furthermore, "Chance Find Procedures" must be adhered to and compliance monitored.

It has been reiterated throughout the report that the project should be designed and implemented in a manner that is disable-friendly to ensure that vulnerable groups are not placed at more disadvantage as a result of this project.

The report has provided the standard procedure and institutional arrangements for environmental and social screening, categorization and approval of sub-projects and serves as a guide to develop detailed site-specific Environmental and Social Impact Assessment (ESIAs)/ Environmental and Social Management Plans (ESMPs) that would be consulted upon and disclosed prior to project commencement. The effective use of this ESMF would be regularly reviewed as part of the project's Monitoring & Evaluation (M&E) system.

ANNEX 1: CONSULTATION ATTENDANCE SHEETS

PREPARATION OF SAFEGUARDS INSTRUMENTS FOR TEN MILLION ADOLESCENT GIRLS PROJECT
ATTENDANCE SHEET FOR STAKEHOLDER CONSULTATIONS

DATE: 24th October, 2019
VENUE:

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PREPARATION OF SAFEGUARDS INSTRUMENTS FOR TEN MILLION ADOLESCENT GIRLS PROJECT
ATTENDANCE SHEET FOR STAKEHOLDER CONSULTATIONS

DATE: 24/10/19
VENUE:

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PREPARATION OF SAFEGUARDS INSTRUMENTS FOR TEN MILLION ADOLESCENT GIRLS PROJECT
ATTENDANCE SHEET FOR STAKEHOLDER CONSULTATIONS

DATE:
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PREPARATION OF SAFEGUARDS INSTRUMENTS FOR TEN MILLION ADOLESCENT GIRLS PROJECT
ATTENDANCE SHEET FOR STAKEHOLDER CONSULTATIONS

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**ATTENDANCE REGISTAR AT STATE - LEVEL STAKEHOLDERS CONSULTATIONS
TEN MILLION ADOLESCENT GIRLS PROJECT**

**VENUE: Ekiti State Ministry of Education, Science and Technology; Secretariat,
ADO EKITI**

DATE: 31st October 2019

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ANNEX 2: ENVIRONMENTAL HEALTH AND SAFETY GUIDELINES

The EHS guidelines for any World Bank financed project contains performance levels and measures that should be considered for new and existing facilities. The application of ESH involve the establishment of site-specific targets, with appropriate timetable for achieving them which should be tailored to the hazards and risks associated with the project. This proposed project may involve activities on existing and new facilities, consequently the ESHG outlined below will considered both situations.

Nigeria's ESH guideline differs from the World Bank guidelines, then the more stringent one should be applied. However, if the less stringent guideline is chosen or more appropriate measures than those provided in this EHS Guideline below probable based on specific project circumstances, a full and detailed justification for any proposed alternatives should be provided by the proponent as part of the site-specific environmental assessment. This justification should demonstrate that the choice for any alternate performance levels is protective of human health and the environment,

The proponent should adhere to the following ESH Guidelines

- Identify all ESH hazards and associated risks early as possible for project life cycle. The ESHG must be considered during site selection process, product design process, engineering planning process for capital requests, engineering work orders, facility modification authorizations, or layout and process change plans
- Involve ESH professionals, who have the experience, competence, and training necessary to assess and manage ESH impacts and risks
- Carry out specialized environmental management functions including the preparation of project or activity-specific plans and procedures that incorporate specific and relevant technical recommendations as shown below
- The proponent must understand the likelihood and magnitude of ESH risks associated with this project based on: whether the project will generate significant quantities of emissions or effluents, or involve hazardous materials or processes; the potential consequences to workers, communities, or the environment if hazards are not adequately managed, which may depend on the proximity of project activities to people or to the environmental resources on which they depend
- Prioritize the risk management strategies with the objective of achieving an overall reduction of risk to human health and the environment
- Favor strategies that eliminate the cause of the hazard at its source, for example, by selecting less hazardous materials or processes
- When impact avoidance is not feasible, incorporate engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences, for example, with the application of pollution controls to reduce the levels of emitted contaminants to workers or environments.
- In some instances, prepare workers and nearby communities to respond to accidents, including providing technical and financial resources to effectively and safely control such events, and restoring workplace and community environments to a safe and healthy condition.
- The ESH performance should be monitored

The table below highlights key issues to monitor and consider under ESHG

Area	Parameter Guidelines	Specifications
Environment	<p>Air Emissions and Ambient Air Quality Projects with significant sources of air emissions, and potential for significant impacts to ambient air quality, should prevent or minimize impacts such that it does not affect the people and the environment</p>	<p>Point Source, Fugitive sources and mobile sources. e.g. VOC, PM, GHGs, NO_x, SO₂, ODS, CO</p>
	<p>Energy Conservative Conserving energy should be viewed in the context of overall consumption patterns, including those associated with production processes and supporting utilities, as well as overall impacts associated with emissions from power sources.</p>	<p>Energy Management, Energy Efficiency, Process Heating, Process Cooling,</p>
	<p>Wastewater and Ambient Water Quality</p> <ul style="list-style-type: none"> • Understand the quality, quantity, frequency and sources of liquid effluents in its installations. • Plan and implement the segregation of liquid effluents principally along industrial, utility, sanitary, and storm-water categories, • Identify opportunities to prevent or reduce wastewater pollution through such measures as recycle/reuse within their facility, • Assess compliance of their wastewater discharges with the applicable: (i) discharge standard 	<p>General Liquid Effluent Quality: Discharge to Surface Water, Sanitary wastewater, Septic System</p> <p>Wastewater Management: Industrial and Sanitary Waste Water</p>
	<p>Water Conservation</p> <ul style="list-style-type: none"> • Zero discharge design/Use of treated waste water should be included in project design processes • Use of localized recirculation systems in plant/facility/shops (as opposed to centralized recirculation system), with provision only for makeup water • Project design should have measures for adequate water collection, spill control and leakage control system 	<p>Water monitoring/management techniques; Process and cooling/heating water recycling, Reuse, and other techniques; and Sanitary water conservation techniques</p>
	<p>Hazardous Materials Management</p> <ul style="list-style-type: none"> • Avoid or, when avoidance is not feasible, minimize uncontrolled releases of hazardous materials or accidents (including explosion and fire) during their production, handling, storage and use 	<p>Hazard Assessment, Preventive Measures, Management Actions, Control Measures, Emergence Preparedness and Response</p>
	<p>Waste Management</p> <ul style="list-style-type: none"> • Establish waste management priorities at the outset of activities based on an understanding of potential Environmental, Health, and Safety (EHS) risks and impacts and considering waste generation and its consequences • Establish a waste management hierarchy that considers prevention, reduction, reuse, recovery, recycling, removal and finally disposal of wastes • Avoid or minimizing the generation waste materials, as far as practicable 	<p>Waste Prevention, Recycling and Reuse, Collection, Transport, Storage, Treatment and Disposal. Monitoring</p>

Area	Parameter Guidelines	Specifications
	<ul style="list-style-type: none"> Where waste generation cannot be avoided but has been minimized, recovering and reusing waste <p>Noise</p> <ul style="list-style-type: none"> Select equipment with lower sound power levels Install silencers for fans Install suitable mufflers on engine exhausts and compressor components Re-locate noise sources to less sensitive areas to take advantage of distance and shielding Site permanent facilities away from community areas if possible Reduce project traffic routing through community areas wherever possible Plan flight routes <p>Contaminated Land</p>	<p>Prevention, Control, Monitoring and Noise Level</p> <p>Risk Screening, Interim Risk Management and Detailed Risk Screening</p>
Occupational Health and Safety	<p>The General Guidelines for this OHS is as follows:</p> <ul style="list-style-type: none"> Eliminate the hazard by removing the activity from the work process. Examples include substitution with less hazardous chemicals, using different manufacturing processes, etc. Control the hazard at its source through use of engineering controls. Examples include local exhaust ventilation, isolation rooms, machine guarding, acoustic insulating, etc. Minimize the hazard through design of safe work systems and administrative or institutional control measures. Examples include job rotation, training safe work procedures, lock-out and tag-out, workplace monitoring, limiting exposure or work duration, etc. Providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE. 	<p>General Facility Design and Operations Communication and Training Physical, Chemical and Biological Hazards Personal Protective Equipment (PPE) Radiological Hazards Special Hazard Environments and Monitoring</p>
Community Health and Safety	<p>Water Quality and Availability</p> <p>Water Quality</p> <ul style="list-style-type: none"> Prevent adverse impacts to the quality and availability of groundwater and surface water resources. Project should at all times be protected so that they meet or exceed applicable national acceptability standards or in their absence <p>Water Availability</p> <ul style="list-style-type: none"> Groundwater or surface water abstraction for project activities should be properly assessed through a combination of field testing and modelling techniques, 	<p>Surface water Ground Water Drinking Water</p>
	<p>Structural Safety of Project Infrastructure</p>	<ul style="list-style-type: none"> Existing structures, Soils and foundations

Area	Parameter Guidelines	Specifications
		<ul style="list-style-type: none"> • Site grading, Structural design • Specific requirements based on intended use and occupancy • Accessibility and means of egress • Types of construction, Roof design and construction • Fire-resistant construction, Flood-resistant construction
	<p>Life and Fire Safety All new buildings accessible to the public should be designed, constructed, and operated in full compliance with local building codes, local fire department regulations, local legal/insurance requirements, and in accordance with an internationally accepted life and fire safety (L&FS) standard (see annex)</p>	<ul style="list-style-type: none"> • Health and education facilities (classrooms) • Hotels, convention centers, and leisure facilities • Retail and commercial facilities • Airports, other public transport terminals, transfer facilities
	<p>Traffic Safety</p> <ul style="list-style-type: none"> • Traffic safety should be promoted by all project personnel during displacement to and from the workplace, and during operation of project equipment on private or public roads • Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure. • Adoption of best transport safety practices across all aspects of project operations with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public 	<p>Training, Prevention, Control, Accidents/Incidents</p>
	<p>Transport of Hazardous Materials Projects should have procedures in place that ensure compliance with local laws and international requirements applicable to the transport of hazardous materials</p>	
	<p>Disease Prevention</p> <ul style="list-style-type: none"> • Provide surveillance and active screening and treatment of workers • Awareness and Sensitization in health matters • Education initiatives • Provide treatment through standard case management in on-site or community health care facilities. 	<p>Communicable Disease, Vector Borne Disease</p>
	<p>Emergency Preparedness and Response</p>	<ul style="list-style-type: none"> • Administration (policy, purpose, distribution, definitions, etc.)

Area	Parameter Guidelines	Specifications
	All projects should have an Emergency Preparedness and Response Plan that is commensurate with the risks of the facility	<ul style="list-style-type: none"> • Organization of emergency areas (command centers medical stations, etc.) • Roles and responsibilities • Communication systems, Emergency response procedures • Emergency resources, Training and updating • Checklists (role and action list and equipment checklist) • Business Continuity and Contingency
Construction and Decommissioning	Environment	SAME AS ABOVE
	Occupational Health & Safety	SAME AS ABOVE
	Community Health & Safety	SAME AS ABOVE

ANNEX 3: OCCUPATIONAL HEALTH AND SAFETY PLAN

Considering the potential for rehabilitation works to require medium to large scale labor, and the peculiarity of the civil, the project will require a Project Occupational Health and Safety Management Plan. The plan will focus on workers' health and safety during the major rehabilitation activities

Rehabilitation works under the Project

The PIU (OHS Responsibilities)

The PIU has a responsibility to ensure the health and safety of all persons working on all the components and sub-components, their own employees, Contractors, Subcontractors and agency employees.

In this regard, the PIU through the PIU shall: Define systems of work and requirements for Contractors and Subcontractors to ensure their health and safety on the site. This means that PIU will require Contractors and Subcontractors to follow safe systems of work, meet statutory and other requirements (Nigerian and International), and audit their capability to safely manage work performed by their own employees. A periodic audit by the PIU of the Contractors' work performance and systems including OHS should be required as partial basis for payment.

Provide information needed by the Contractors to document and carry our work in a safe manner.

PIU should provide information on hazards and their associated risks while working on any specific part of the project. This will enable Contractors document their procedures for managing work around hazardous conditions, and to ensure they are aware of these hazards. PIU will do this by providing a set of requirements and safe work procedures through the Terms of Reference (TOR) in the Contractors contract document. It should also highlight Risk and Control Assessments, Work Control Permits etc.

Review Contractors' Safe Work Mode Method Statements to ensure they comply with **Bank's Environmental and Social safeguards and statutory HSE Requirements.**

Ensure that Contractors follow all safety and environmental requirements.

PIU should monitor health and safety during rehabilitation works. Pre-start checks, inspections and audits will be conducted while on-site. These checks will look at work practices and methods, equipment conditions and suitability, and competency of people through checking the permits, licenses etc. Individuals are not permitted to bring, use or be under the influence of alcohol or non-prescribed drugs on-site.

Contractors' Responsibilities

Contractors are responsible for ensuring that their work methods consider and incorporate best practice and safety requirements.

Contractors are responsible for ensuring that safety and health hazards associated with the work they are performing, are satisfactorily controlled and do not pose a risk. In the process of carrying out their work a Contractor may introduce other hazards. The identification and control of these hazards is the responsibility of the Contractor. These hazards and controls identified by the Contractor must be considered in the Work Method Statements.

Contractors are responsible for ensuring the health and safety of their employees including Sub-Contractors. This means that the Contractor is responsible for ensuring that:

- a) their employees and subcontractors are adequately trained and competent in performing their tasks, and in basic safety procedures.
- b) are provided information about processes and materials which are hazardous.
- c) are issued with appropriate safety equipment and have appropriate instruction in its use.
- d) have safe work methods and are adequately supervised to ensure safe work.
- e) work place safety inspections are regularly carried out.
- f) there is access to first aid equipment and trained persons

Contractors are responsible for ensuring their plants and equipment are safe. This means that Contractors' equipment and plants whether their own or hired is a) in a serviceable condition with regular maintenance and inspections. b) suitable for the task it is to perform and 3) meets the PIU requirements. The primary concerns of plants are that:

- All guards are in place and secure
- Relevant safety equipment is fitted and working
- Operating controls (indicators, brakes, steering etc.) are working properly b) possible safety or environmental risk items are satisfactory. (hydraulic hoses, mufflers, exhaust emissions, fluid leaks etc.).

Proposed rehabilitation works for Access Road

PIU OHS Responsibilities

The PIU has a responsibility to ensure that all farmers, by-passers, visitors and locals are informed about road rehabilitation

Contractors should be responsible for ensuring that:

- Caution signs are in place.
- Dust reduction methods
- Noise reduction

ANNEX 4 GENERIC WORKERS CAMPSITE MANAGEMENT PLAN

The Workers Camp Site Management Plan for the project should address specific activity that will be undertaken to minimize the impacts resulting from siting a worker's camp on the local project communities.

Elements for managing risks associated with the Workers Campsite under the proposed project include:

- **Location:** The Contractor shall ensure to site workers camp at a designated location approved by the SPIU. The location was determined during the preliminary design preparation in conjunction with the local communities/authorities with the following criteria:
 - ✓ Be located outside the protection zone of watercourses (100 m) and wetlands;
 - ✓ Be located within an acceptable distance from existing residential areas;
 - ✓ Not located in areas with intact vegetation
 - ✓ The contractor must first obtain the necessary licenses and consents from the local authorities or from the owner of the needed area; Although it is the contractor's decision, it is recommended that whenever possible the camps should be handed over to the administrative or community authorities for future use;
 - ✓ The contractor must submit for the prior approval of the Resident Engineer, the implantation design and other project structures and specifications related to the camps and sites that are intended to be built;
 - ✓ The contractor shall take all necessary measures and precautions to ensure that the execution of the works is carried out in accordance with environmental, legal and regulatory requirements, including those set out in this document; The contractor shall take all measures and precautions to avoid any disturbance in the local communities and among the users of the road, as a result of the project execution;
 - ✓ The contractor shall, whenever possible, apply measures to reduce or eliminate any sources of disturbances. The contractor shall follow the provisions of this document, as well as the applicable legislation and standards, during the use, operation and maintenance of the camps and sites, in particular with regard to water supply and sanitation, solid waste management, handling and storage of dangerous substances, etc.;
 - ✓ The areas occupied by the camps and sites must be recovered at the end of the project, when the contractor is demobilized, through the replacement of previously existing conditions, unless other uses are intended

- **Accommodation, Hygiene and Sanitation:** The Contractor will ensure that all necessary sanitary facilities shall be provided for workers expected on site: separate rooms will be provided for male and female workers, all necessary sanitary facilities complying with World Health Organization (WHO) regulations will be provided for workers including:
 - ✓ Separate toilets for male and female
 - ✓ Portable water with well-placed overhead tanks
 - ✓ Wash basins
 - ✓ Concrete and covered septic tanks

- **On-site Social and Health Care Facilities:** Provision of basic on-site social and medical facilities such as first aid, basic health care center, recreational center, food service, etc. in order to reduce pressure on community facility.
- **Campsite Safety and Security:** Provision of 24 hours security stationed at the Campsite to ensure the security and safety of construction workforce and construction equipment.
- **Campsite Waste Management:** Adequate waste management of sewage and other forms of waste within the campsite. The Campsite shall be equipped with independent toilet facilities for male and female workers respectively, in order to discourage irregular waste disposal. Furthermore, standards must be instituted for personal and public hygiene among project workers. Additionally, project workers shall be properly trained on personal hygiene.
- **Establishment of and Training on Workers on Code of Conduct:** The Supervising Engineer and Safeguards Unit shall ensure that Contractors establish a workers' Code of Conduct (CoC). The CoC will help mitigate some of the social and environmental impacts of labor influx such as risk of social conflict, Increased risk of illicit behavior and crime, Increased burden on and competition for public service provision, Wastewater discharges, Increased demand on freshwater resources, and Inadequate waste disposal and illegal waste disposal sites etc., will help keep workers (local/foreign) in check on the rules and regulations binding their engagement. Contractors to ensure provision of training to workforce on code of conduct and ensure strict compliance. Measures provided for in the ESMP to deter illicit behavior and other social vices are adequately enforced.
- **Training programs:** Conduct and ensure key staff, including contractors, receive training regarding the likelihood, significance and management of influx-related issues such as HIV/AIDS, GBV, SEA, VAC etc.
- **Carry out Regular Monitoring:** The SPIU shall monitor for change throughout the project cycle to ensure compliance and on mitigation effectiveness from projects/contractors. Ensure a documented monitoring program that tracks key social outcomes, changes and issues at regular intervals throughout the project lifecycle

ANNEX 5 ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

1. State:
2. Local Government Area:
3. Nature of the activity:
4. Brief Description of the Project:.....
5. Environmental Category of the Main Project

A) GENERAL ELIGIBILITY

Does the activity ...	Yes	No
	Have an impact on areas for which the World Bank Environmental and Social Standards have not been applied? In particular:	
<ul style="list-style-type: none"> • Disrespect for human dignity, human rights, economic systems and cultures of indigenous peoples (under <i>ESS7: Indigenous Peoples</i>)? • Impact on forest health and quality? • Involve construction of dams? • Serious consequences resulting in malfunctioning or stopping a dam? • Effects on waters of two or more states (under <i>OP 7.50 International waterways</i>)? • Is the project highly contentious and likely to attract the attention of NGOs or civil society nationally or internationally? 		

If the answer is YES to one of these general eligibility questions: the sub-project is not eligible under the Project.

B) ENVIRONMENTAL AND SOCIAL IMPACTS SCREENING

	Will the activity ...			If yes give the extent (in ha/number)
		Yes	No	
1	Include clearing of forests?			
2	Include removal and/or cutting of a considerable number of trees?			
3	Involve reclamation of wetland, land?			
4	Potentially affect the ecology of a protected area (e.g., interference on mammalian or bird migration routes)?			
5	Potentially affect geological or soil instability (e.g., erosion, landslides and subsidence)?			
6	Be located in an area threatened by silting?			
7	Be located in any flood protection area?			
8	Be located in any flood prone area?			
9	Be located 60 meters from the bank of a public stream			
10	Lead to increase in waste generation			
11	Be located in an area where there is no household waste management system?			
12	Generate non-hazardous waste that will be stored on the project site?			
13	Use of hazardous or toxic materials and generation of hazardous wastes?			

14	Involve the use of an already over-exploited groundwater?			
15	Contribute to reducing the amount of water available to other local users?			
16	Be located in an area where there is no sanitation network?			
17	Occur in old establishments that may contain asbestos cement?			
18	Include large deep excavations?			
19	Soil excavation during subproject's construction so as to cause soil Erosion			
20	Have important potential accidental soil erosion, groundwater pollution and contamination?			
21	Greatly increase air pollution and dust generation?			
22	Long-term impacts on air quality			
23	Greatly increase noise pollution and vibrations?			
24	Finance any pesticides or procurement of pesticide equipment			
25	Minimum land area required for the proposed development (ha)			
26	Available total land area within the identified location (ha)			
27	Expected construction period			
28	Source of fresh Surface Water			
29	Surface Water Use	Agriculture	Domestic	Animal other
30	Change of surface water quality or water flows (e.g. Increase water turbidity due to run-off, waste water from camp sites and erosion, and construction waste) or long term.	Yes	No	
31	Separation or fragmentation of habitats of flora and fauna?	Yes	No	
32	Are there any environmentally and culturally sensitive areas within 250m?	Protected Areas/Migratory Pathways/Archaeological sites/Wetlands/Mangroves sands		
33	Any historic, archaeological reserve, ancient or protected monument, graveyards, temples	Yes	No	
34	Need to open new, temporary or permanent, access roads?			
35	Acquisition (temporarily or permanently) of land (public or private) for its development			
36	Is there any potential for land dispute, assets and livelihoods displacement?	If yes, refer to Resettlement Policy Framework		
37	Involuntary restriction of access by people to legally designated parks and protected areas			
38	Risk of disease dissemination from construction workers to the local peoples (and vice versa)?	Yes	No	
39	Are children in the project area likely to be used for child labor			

If the answer is YES to one of these questions: An Environmental Review (ER)/Environmental Audit/ESMP/ ESIA will be prepared in line with World Bank requirements – even if, because of the nature of the works, national procedures do not require the preparation of an Environmental Review (ER) or of an EIA.

If the answer is NO to all questions: According to national regulations, an ER or an EIA will not be mandatory. However, in compliance with WB ESF the preparation of a fully-fledged ESMP, will be considered as necessary.

The appropriate instrument to be prepared will depend on the risk rating of the sub-project based on the screening

Additional checklists may be developed as required based on the complexity of the projects

ANNEX 6 ENVIRONMENTAL AND SOCIAL MONITORING CHECKLIST

ACTIVITIES	INSTRUMENTS		
PREPARATORY PHASE			
E&S Framework	ESMF	RPF	PMP
Status of Preparation	Yes/No	Yes/No	Yes/No
Date of Disclosure (in-Country)			
Date of Disclosure (World Bank)			
Date of Consultations Carried out			
E&S Staffing	Environmental Officer	Social Officer	GBV Officer
	Yes/No	Yes/No	Yes/No
Training for PIU/MDAs	ESMF Implementation	RPF Implementation	
Date of Training			
Participants			
Site – Specific Instruments for Sub-Projects			
Title of Rehabilitation Project	ESIA	RAP	ESMP
Status of preparation	Yes/No	Yes/No	Yes/No
Review status	FPMU/WB	FPMU/WB	FPMU/WB
Cleared Status	Yes/No	Yes/No	Yes/No
Date of Disclosure (in-Country)			
Date of Disclosure (World Bank)			
Date of Consultations Carried out			
Training on ESIA/ESMP Implementation	ESMP Implementation	RAP Implementation	
Date of Training			
Participants			
	Developed	Operationalized	
Grievance Redress Mechanism	Yes/No	Yes/No	
Availability number of complaint boxes on all roads			
Total number of contractor staff on project			
	Locals	Foreign	
Total number of contractor staff trained on Code of Conduct (CoC)			
Total number of signed code of conduct by staff and contractor			
Host agreement received for contractors yard/Office			
Host agreement received for borrow pits			
Host agreement received for contractors residence			
IMPLEMENTATION PHASE			
Contractors C-ESMP	Yes	No	
Staffing			
Availability of Environmental /HSE on contractors team	Yes	No	
Availability of Environmental Officer/HSE on supervision consultants team	Yes	No	
Availability of Social Officer on contractors team			
Availability of Social Officer on supervision consultants team			

Training (Contractors, Supervision Consultants)	C-ESMP Implementation/ HSE	GBV Training/ Code of Conduct	Grievance Redress Mechanism
Date of Training			
Participants			
Site Monitoring			
Adequacy of site office and campsite (water, ventilation, furniture, toilets, security, first-aid)			
Conducive site office in line with OHS requirements			
Conducive camp site in line with OHS requirements			
Availability of well-stocked first aid box	Site office	Construction site	Mobile kit
Standard Toilet Facility meeting WHO standard	Male/female Y/N	Water Y/N	Adequate septic Y/N
Adequate waste management	Y	N	
Adequate Staging Area			
Fence	Y	N	
Caution Tape	Y	N	
Good housekeeping	Y	N	
Lightening	Y	N	
Occupational Health & Safety	Available/ Adequate	Compliance	
PPEs			
Cautionary Signs			
Flagmen			
Cordon off excavated areas			
Mobile First Aid box			
Accident/ Incident	Fatal Y/N	Minor Y/N	
Compliance with Traffic Management Plan and safety (Site Safety and Security, Road/caution Signs)			
Awareness and sensitization of communities on STIs/STDs			
Date of program/ Venue			
Participants			
Grievance Redress			Comments
No of Grievances received			
No of grievances resolved			
Environmental Parameters Limits			
Satisfactory	Not satisfactory	Comments	
Air pollution			
water pollution			
Land pollution			
Noise			
Fugitive dust			

ANNEX 7: GENERIC WASTE MANAGEMENT PLAN

Objectives of the Waste Management Plan

- Ensure reduction of wastes
- Meet the environmental requirements of the different State FME and other national and international waste management guidelines.
- Establish, implement and maintain waste segregation at source.
- Ensure that PCU and Contractors are responsible for effective waste handling and disposal process, which shall be monitored by relevant waste disposal authorities

The ESMP will provide detailed information on waste management including the amount and type of waste to be generated, the sources, and the existing waste management practices and proffer mitigation measures, which will involve:

- Sensitization amongst the Contractors, workers, laborers on the need for effective waste management in and around the pumping stations throughout the project activities.
- Community sensitization and mobilization on the adverse consequences of poor waste management.

Waste types

The rehabilitation works will produce vast amount of waste from the construction activities.

The following are some of the materials that can be expected to be generated during construction: vegetation stripping, concrete forms, packing materials, containers for various construction materials, asbestos, plastics, waste oil, filters, lubricants and hydraulic fluids, food, sewage, etc. It is necessary to ensure that wastes generated during construction are handled in a way that protects human, animal and environment health and complies with applicable regulations.

Recommended Measures for Waste Management

- Minimize the production of waste by using resource efficient products
- Contractors should reuse and recycle waste generated as much as possible
- Identify and classify the type of waste generated. If hazardous wastes are generated, proper procedures must be taken regarding their storage, collection, transportation and disposal
- Identify and demarcate disposal areas clearly indicating the specific materials that can be deposited in each
- Control placement of all construction waste to approved disposal sites (>300 m from rivers, streams, lakes, or wetlands).
- Dispose all wastes in authorized areas, metals, used oils, and excess material generated during construction
- Incorporate recycling systems and the separation of materials
- Identify and demarcate equipment maintenance areas (>15m from rivers, streams, lakes or wetlands).
- Identify, demarcate and enforce the use of within-site access routes to limit impact to site vegetation.
- Install and maintain an adequate drainage system to prevent erosion on the site during and after construction.
- Erect erosion control barriers around perimeter of cuts, disposal pits, and roadways.
- Spray water on dirt roads and stockpiled soil to reduce wind-induced erosion and particulates dispersal, as needed.

- Identify and demarcate locations for stockpiles and borrow pits, ensuring that they are 15 meters away from critical areas such as steep slopes, erosion-prone soils, and areas that drain directly into sensitive water bodies.
- Establish and enforce daily site clean-up procedures, including maintenance of adequate disposal facilities for construction debris.

The management of other kinds of waste that may be generated is highlighted below

General Waste

- There should be adequate number of garbage bins and containers made available at strategic areas of the site. The use of plastic bin liners should be encouraged.
- All organic and inorganic materials should be placed and/or disposed of so as not to directly or indirectly impact any watercourse or groundwater. The placement and disposal of all such products and materials should be done in an environmentally acceptable manner.
- Solids, sludge and other pollutants generated as a result of construction or those removed during the course of treatment or control of wastewaters will be disposed of in a manner that prevents their direct or indirect re-entry into any watercourse or ground water.
- Any waste material that is inadvertently disposed in or adjacent to watercourses should be removed immediately in a manner that minimizes adverse impacts, and the original drainage pattern should be restored.
- All wastes that are not designated, as combustible waste on-site should be recycled, disposed of in any of sites (landfill, dumpsites, or waste treatment, if applicable) approved the authority
- Waste materials should be placed and stored in suitable containers. Storage areas and containers will be maintained in a sanitary condition and shall be covered to prevent spreading of wastes by water, wind or animals.
- All food wastes should be collected and stored in containers at appropriate locations and should be emptied at regular intervals and the collected waste should be transported to Government designated waste management facilities.

Oil waste

- Ensure that all equipment maintenance activities, including oil changes, are conducted within demarcated maintenance areas designated for such.
- Ensure that oil or other lubricants are never dumped on the ground, in designated areas.

Material waste (concrete, stones, mixtures, cement)

- There should be a designated site for washing of containers or trucks that contain cement wastes.
- Control placement of all construction waste to approved disposal sites (>300 m from rivers, streams, lakes, or wetlands).
- Concrete waste, including wastewaters from batching or cleaning, should only be disposed of at approved and designated disposal sites with containment facilities.
- All cement-contaminated wastewater from cleaning or mixing is to be considered toxic and must be prevented from entering any watercourse or drainage channel for at least 48 hours, in order to allow the water to reach neutral pH level.

Sewage Disposal

- It is highly imperative to channel sewage facilities to avoid getting into the ground water, soil or even resulting to other types of nuisance to the environment.
- Mobile sanitary waste collection and disposal facilities or systems should be made available at the construction sites, camps, work areas, workshops, stores, and offices.
- All temporary toilets should be placed in environmentally acceptable areas and shall be equipped with approved septic tanks having safe drainage that are emptied only into approved treatment plants or sewage tanker truck.
- The temporary toilet facility should be secured to avoid or minimize damage from animals or vandalism.

ANNEX 8: CONTRACTOR’S CODE OF CONDUCT ON GENDER BASED VIOLENCE (GBV) AND SEXUAL EXPLOITATION & ABUSE (SEA)

The company is obliged to create and maintain an environment which prevents Gender Based Violence (GBV) and Sexual Exploitation & Abuse (SEA) issues. The company is also required to maintain an environment where the unacceptability of GBV and actions against children are clearly communicated to all those involved in the project. In order to prevent GBV and SEA, the following core principles and minimum standards of behavior will apply to all employees without exception:

1. GBV/SEA constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties and/or termination of employment. All forms of GBV/SEA including grooming are unacceptable, be it on the work site, the work site surroundings, project neighborhoods or at worker’s camps. Prosecution of those who commit GBV or SEA will be followed.
2. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
3. Do not use inappropriate language or behavior towards women, children and men. This includes harassing, abusive, sexually provocative, derogatory, demeaning or culturally inappropriate words, gestures or actions.
4. Sexual activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense.
5. Sexual favors or other forms of humiliating, degrading or exploitative behavior are prohibited.
6. Sexual interactions between contractor’s and consultant’s employees at any level and member of the communities surrounding the workplace that are not agreed to with full **consent** by all parties involved in the sexual act are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered “non-consensual” within the scope of this Code.
7. All employees are required to attend an induction training course prior to commencing work on site to ensure they are familiar with the GBV/SEA Code of Conduct.
8. All employees must attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the institutional GBV and SEA Code of Conduct.
9. All employees will be required to sign an individual Code of Conduct confirming their agreement to support GBV and SEA activities.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and SEA. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action.

FOR THE COMPANY

Signed by _____

Title: _____

Date: _____

MANAGER'S CODE OF CONDUCT ON GENDER BASED VIOLENCE (GBV) AND SEXUAL EXPLOITATION & ABUSE (SEA)

Managers at all levels have responsibilities to create and maintain an environment that prevents GBV and SEA. They need to support and promote the implementation of the Company Codes of Conduct. To that end, Project Managers are required to sign up to Codes of Conduct applicable to their managerial duties within the context and also sign the Individual Codes of Conduct. This commits them to support and develop systems that facilitate the implementation of this action plan and maintain a GBV-free, child-safe and conflict-free work environment. These responsibilities include but are not limited to:

Mobilization

1. Establish a GBV/SEA Compliance Team from the contractor's and consultant's staff to write an Action Plan that will implement the GBV and SEA Codes of Conduct.
2. The Action Plan shall, as a minimum, include the
 - i. Standard Reporting Procedure to report GBV and SEA issues through the project Grievance Redress Mechanism (GRM);
 - ii. Accountability Measures to protect confidentiality of all involved; and,
 - iii. Response Protocol applicable to GBV survivors/survivors (including access to support coping and post-trauma management strategies) and perpetrators.
 - iv. Engagement of the services of social service providers (NGOs) with requisite skill in the prevention and management of GBV and SEA.
3. Coordinate and monitor the development of the Action Plan and submit for review to the RAAMP-PIU safeguards teams, as well as the World Bank prior to mobilization.
4. Update the Action Plan to reflect feedback and ensure the Action Plan is carried out in its entirety.
5. Provide appropriate resources and training opportunities for capacity building so members of the compliance team will feel confident in performing their duties. Participation in the Compliance team will be recognized in employee's scope of work and performance evaluations.
6. Ensure that contractor, consultant and client staff are familiar with the RAAMP GRM and that they can use it to anonymously report concerns over GBV and SEA.
7. Hold quarterly update meetings with the compliance team to discuss ways to strengthen resources and GBV/SEA support for employees and community members.
8. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees.
9. Ensure that when engaging in partnership, sub-grant or sub-recipient agreements, these agreements
 - a) incorporate this Code of Conduct as an attachment;
 - b) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to comply with this Code of Conduct; and
 - c) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against GBV and SEA, to investigate allegations thereof, or to take corrective actions when GBV/SEA has occurred, shall constitute grounds for sanctions and penalties.

Training

1. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV/SEA Codes of Conduct.

2. Provide time during work hours to ensure that direct recruits attend the mandatory induction training which covers GBV/SEA training required of all employees prior to commencing work on site.
3. Managers are required to attend and assist with the NGO-facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce results of consequential evaluations.
4. Collect satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.

Prevention

1. All managers and employees shall receive a clear written statement of the company's requirements with regards to preventing GBV/SEA in addition to the training.
2. Managers must verbally and in writing explain the company and individual codes of conduct to all direct recruits.
3. All managers and employees must sign the individual 'Code of Conduct for GBV and SEA, including acknowledgment that they have read and agree with the code of conduct.
4. To ensure maximum effectiveness of the Codes of Conduct, managers are required to prominently display the Company and Individual Codes of Conduct in clear view in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.
5. Managers will explain the GRM process to all employees and encourage them to report suspected or actual GBV/SEA
6. Managers should also promote internal sensitization initiatives (e.g. workshops, campaigns, on-site demonstrations etc.) throughout the entire duration of their appointment in collaboration with the compliance team, service providers and in accordance to the Action Plan.
7. Managers must provide support and resources to the compliance team and service provider NGOs to create and disseminate the internal sensitization initiatives through the Awareness-raising strategy under the Action Plan.

Response

1. Managers will be required to provide input, final decisions and sign off on the **Standard Reporting Procedures and Response Protocol** developed by the compliance team as part of the Action Plan.
2. Once signed off, managers will uphold the **Accountability Measures** set forth in the Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV/SEA (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
3. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of **14 days** from the date on which the decision was made.
4. Managers failing to comply with such provision can be in turn subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:
 - i. Informal warning
 - ii. Formal warning
 - iii. Additional Training
 - iv. Loss of up to one week's salary.
 - v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
 - vi. Termination of employment.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and SEA. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action.

FOR THE EMPLOYER

Signed by _____
 Title: _____
 Date: _____

EMPLOYEE’S CODE OF CONDUCT ON GENDER BASED VIOLENCE (GBV) AND SEXUAL EXPLOITATION & ABUSE (SEA)

I, _____ (*name of employee*), acknowledge that preventing Gender-based Violence (GBV) and Sexual Exploitation & Abuse are important. GBV/SEA activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or termination of employment. All forms of GBV or SEA are unacceptable either on the work site, neighbouring project communities, or at worker’s camps. Prosecution of those who commit GBV/SEA will be followed as appropriate according to applicable laws. I also acknowledge the need to maintain peaceful relationships and interactions with residents of project areas.

Specifically, I agree that while working on projects of the Rural Access and Mobility Project (RAAMP), I will:

- i. Maintain conflict-free relationships with residents of project areas *when such relationships and interactions become necessary*.
- ii. Consent to police background check.
- iii. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- iv. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- v. Not participate in sexual activity with children—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defense.
- vi. Not engage in sexual favors or other forms of humiliating, degrading or exploitative behavior.
- vii. Not have sexual interactions with members of the communities surrounding the work place and worker’s camps that are not agreed to with full consent by all parties involved in the sexual act. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- viii. Attend and actively partake in training courses related to HIV/AIDS, GBV and SEA as requested by my employer.
- ix. Report through the GRM or to my manager suspected or actual GBV and/or SEA by a fellow worker, whether in my company or not, or any breaches of this code of conduct.

With regard to children under the age of 18:

- x. Wherever possible, ensure that another adult is present when working in the proximity of children.
- xi. Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
- xii. Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor’s permission, and ensure that another adult is present if possible.
- xiii. Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children’s images for work related purposes”).
- xiv. Refrain from physical punishment or discipline of children.

- xv. Refrain from hiring children for domestic or other labor which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- xvi. Comply with all relevant local legislation, including labor laws in relation to child labor.