FEDERAL MINISTRY OF EDUCATION

KATSINA STATE GOVERNMENT NIGERIA

Environmental and Social Management Plan (ESMP)

For the Proposed Construction Works for Selected of JSS & SSS 150 Schools in Katsina State under the Katsina **Adolescent Girls' Initiative for Learning and Empowerment (AGILE)**

FINAL REPORT - OCTOBER, 2022

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Acronyms

ACHPR	African Charter on Human and Peoples' Rights
ACRWC	African Charter on the Rights and Welfare of the Child
AGILE	Adolescent Girls Initiative for Learning and Empowerment
BOQ	Bill of Quantities
CMP	Campsite Management Plan
CBMC	Community Based Management Committee
CCTV	Circuit surveillance cameras
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
CoC	Code of Conduct
CRC	Convention on the Rights of the Child
CRPD	Convention on the Rights of Persons with Disabilities
EHSG	Environmental, Health & Safety Guidelines
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ES-MSIP	Environmental and Social – Management Strategies and Implementation Plans
ESS	Environmental and Social Standards
FMEnv	Federal Ministry of Environment
FMWASD	Federal Ministry of Women Affairs and Social Development
FRSC	Federal Road Safety Corps
GBV	Gender Based Violence
GPS	Geographic Positioning System
GRM	Grievance Redress Mechanism
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic, Social and Cultural Rights
IDPs	Internally Displaced Persons
ILO	International Labor Organisation
JSS	Junior Secondary School
KSEPA	Katsina State Environmental Protection Agency
LGA	Local Government Authority
LMP	Labour Management Procedures
MDA	Ministries Departments and Agencies
M&E	Monitoring and Evaluation
NESREA	National Environmental Standard Regulation and Enforcement Agency
NPCU	National Project Implementation Unit
NSCDC	Nigeria Security and Civil Defence Corps
NURTW	National Union of Road Transport Workers
OHSP	Occupational Health and Safety Plan
PAD	Project Appraisal Document
PAP	Project Affected Persons
PC	Project Coordinator
PCR	Physical and Cultural Resource
PDO	Project Development Objective
PPE	Personal Protective Equipment
PWD	People With Disability
RAPs	Resettlement Action Plans
RPF	Resettlement Policy Framework
SBMC	School-Based Management Committee
SEA	Sexual Exploitation and Abuse
SEB	Secondary Education Board
SEP	Stakeholder Engagement Plan

SH	Sexual Harassment
SIG	School Improvement Grant
SSS	Senior Secondary School
SPIU	State Project Implementation Unit
SPM	Security Management Plan
SPM10/ 2.5	Suspended Particulate Matter 10/ 2.5
STDs	Sexually Transmitted Diseases
STIs	Sexually Transmitted Infections
SUBEB	State Universal Basic Education Board
TMP	Traffic Management Plan
UBEB	Universal Basic Education Board
VAPP	Violence Against Persons Prohibition
VAC	Violence Against Children
VOC	Volatile Organic Compound
WASH	Water Sanitation and Hygiene
WB	World Bank
WHO	World Health Organization
WMP	Waste Management Plan

Executive Summary

ES 1: Introduction

The Federal Government of Nigeria (FGN) has initiated the Adolescent Girls Initiative for Learning and Empowerment (AGILE) in collaboration with the World Bank as part of the Government's long-term education reform agenda to adequately address the identified constraints of accessing and completion of Secondary education facing adolescent girls in Nigeria. The project will work with the federal government and support the education programs of participating states of Borno, Ekiti, Kaduna, Kano, Katsina, Kebbi and Plateau to improve secondary education opportunities amongst girls. The lead agency for the Federal Government is the Federal Ministry of Education, while the State Ministries of Education are responsible for implementation of the project in the participating states.

In Katsina State, the rationale for the project is in line with the PDO as stated above, the AGILE intervention will help to address some of the challenges in Katsina with respect to Girl child education in the state which includes access, poverty, early marriage, and infrastructure, cultural and religious misconceptions. As part of component 1.1 activities, the state has selected 150 schools for new construction activities.

In compliance with the World Bank Environmental and Social Framework (ESF) an environmental and social screening was conducted for the proposed construction works which identified the need to prepare an Environmental and Social Management Plan (ESMP) to identify environmental and social risks/impacts and propose mitigation measures to address the risks/impacts. This ESMP has thus been prepared to guide Katsina AGILE in ensuring that project implementation will avoid negative environmental and social impacts, reduce or mitigate them to acceptable levels. The ESMP contains mitigation measures, roles/responsibilities, and costs, as well as a defined monitoring plan with monitoring responsibilities and costs.

ES 2: Administrative and Regulatory Framework

This ESMP is prepared in consonance with relevant Katsina State and Federal Government environmental and social policies, laws, regulations, and the World Bank ESF. This includes the National Policy on the Environment, Environmental Impact Assessment (EIA) Act, National Gender Policy, Katsina State Environmental Protection Laws, State social protection policies, the applicable World Bank Environmental and Social Standards (ESSs) applicable to the project amongst others as detailed in chapter 2 of this report.

ES 3: Description of the Project

The selected 150 schools consist of Junior and Senior Secondary Schools (JSS & SSS) across 34 Local Governments Areas (LGAs) for intervention works, which will include new construction of classroom blocks, administrative blocks, toilets/sanitary facilities, science laboratories, multipurpose halls, and drilling of boreholes. Other associated activities include site clearing, staging areas and campsites, material sourcing, and use of labor. Most of the new buildings will be constructed within existing schools with only a few earmarked as completely new school locations. A summary of the proposed typology to be constructed in the junior and senior secondary schools respectively is presented in the table ES1 below:

Table ES1: Design Schedule per Site in the Junior and Senior Secondary Schools

Junior Secondary Schools	Senior Secondary Schools
1 block of 4 classrooms (Bungalow design)	1 block of 4 classrooms (Bungalow design)
1 block of 6 classrooms (Story building design)	1 block of 8 classrooms (story building design)
Drilling of borehole & installation of accessories	Drilling of borehole & installation of accessories
2 blocks of 8 cubicle toilets (male and female respectively)	2 blocks of 8 cubicle toilets (male and female respectively)
A classroom will be converted as admin block	1 block of administrative block
	1 block of science laboratory
	1 multipurpose hall

ES 4: Description of the Project Environment

Project Locations

The project is spread across the 34LGAs in Katsina State. Generally, the proposed interventions will be constructed in existing primary or secondary schools. Out of 150 proposed interventions, 7% will be constructed on virgin lands or lands to be acquired from individuals while 93% will be constructed in already existing schools within the state. Most of the interventions are targeted at rural and sub-urban communities, this is largely to bridge the identified gap of limited access to education for children in rural areas compared to those in urban areas. Details of the project environment and pictures are provided in chapter 4 of this report; however, a summary is presented as follows.

Specific Environmental and Social Conditions

Environmental Baseline Conditions

Physio-chemical Analysis of Environmental Baseline

As part of field assessment, baseline studies on the physio-chemical and biophysical components of the environment were conducted using a defined methodology as stated in section 4.4 and annex 14A of this report, while detailed results are presented in annex 14B-14G. The sampling included in-situ sampling and ex-situ (taking samples to the lab for analysis). Criteria for site selection was random; however, it was intentionally spread across all LGAs to ensure representation.

Air Quality

Air quality was measured in-situ using BH – 4S – Portable multi gas detector to measure Volatile Organic Compound (VOC), SPM 2.5 and SPM 10 in 44 random locations across the various LGAs as shown in annex 14B. The air quality analysis of the project area indicates that the air quality in the project area is generally good as parameters were within FMEnv limit. This is largely traceable to the fact that there are no high industrial activities, or vehicular movement within the school environment such as to significantly impact on the ambient air quality. The results were all below FMEnv permissible levels1, VOC ranged from ND – 0.09 (FMEnv limit of 0.1), SPM2.5 ranged from 10 – 27 (FMEnv limit of 35) and SPM 10 ranged from 25 – 65 (FMEnv limit of 150). Annex 14B shows details of all sample locations and results.

1 National Environmental (Air Quality Control) Regulations, 2014

Noise Assessment

Most of the proposed school location are in areas void of industrial activities or activities that will increase the noise levels in the areas. Noise levels were measured in 51 sample locations across the various LGAs as shown in annex 14C, using an Extech Sound Level Meter (in-situ), daytime noise levels ranged from 24dB in the more rural areas to 48dB in the more semi-urban areas due to presence of more human activities such as motorbikes and vehicles, which are all below the FMEnv limit of 60dB and there will be no construction activities after work hours/at night.

Soil Quality Assessment

Composite soil samples were collected from 51 sites in the LGAs as shown in annex 14D, using soil auger. All values for physico-chemical properties of soil analysed (TDS, Conductivity, Hardness, NO_3, SO_4, Cl, Mg, Fe, Pb, Cr and Zn) are within the FMEnv limit. There is a uniform pattern of bacteria distribution in the soils including *E-Coli* (2.1-4.92), *Bacillus specie* (2.5-7.53), *Pseudomonas spp.* (10-27) and *Salmonella spp.* (5.12-11.56) as shown in annex 14E. The distribution is however, closely linked with the occurrence of organic matter. At 0-15 cm depth, soil is rich in organic matter and this layer accordingly harbors the maximum bacterial population.

Water Quality Assessment

Underground water samples were taken from 43 boreholes in sites across the LGAs based on random sampling as presented in annex 14F. In-Situ water quality was conducted for some parameters using Tri-Meter, while laboratory analysis was conducted for other parameters at Umaru Musa Yar Adua University Central laboratory in Katsina State. The values of physicochemical properties of analysed groundwater samples are mostly within the FMEnv limit2 , (i) Conductivity values ranged from 683S/cm [2] - 9583S/cm, which are below the FMEnv limit of 1000, this may be attributed to the fact that the water is not directly exposed to industrial activities as it is from boreholes. (ii) Values for pH were below FMEnv limit of 6.5-8.5mol/L in Tsadoji in Sandamu LGA and AUMPS Daddara in Jibia LGA which was 6mol/L and 6.1mol/L respectively indicating slight acidity. Acidic water can cause corrosion in plumbing pipes and exposes water to copper, zinc, and even lead. To correct this, Sodium Carbonate and Sodium Hydroxide can be injected into the water system using a Peristaltic pump, which is preferred to neutralizing filters as they do not cause hardness in water. (iii) Values for hardness were slightly above the FMEnv limit of 200mg/l in Dambuuna (227mg/l) and Kufan Agga (233mg/l) which may be due to naturally occurring sedimentary rock and calcium bearing minerals, as these values are not too high, they do not pose any significant health risks. (iv) Values of nitrate was slightly above the FMEnv limit in Kayauki(12), Jino(12.4) in Batagarawa LGA, Bindawa (12.24), Dan-Marke (12), Doro (12) in Bindawa LGA, Kadanya (12.98), Dambuna (12) in Charanchi LGA, Shema (12.62) in Dutsinma LGA, Kogari (12) in Matazu LGA, Shinkafi (20.86) in Katsina LGA, Matallawa (12.29), Dugul A (12.48) in , Ingawa lLGA, AUMPS Daddara(20), GJSS Daddara(14) in Jibia LGA, Dargage (12.65) in Zango LGA, Kwantawaram (12.2), Kabomo(12.9) in Bakori LGA, and Kufan Agga (20) in Kurfi LGA, which can be attributable to use of fertilizers to improve agricultural yields (most people in the rural areas are involved in some form of farming and harness fertilizers to boost agricultural yields). High levels of nitrate in drinking water can increase the risks of cancer-causing chemicals, this can be

2 National Environmental (Surface and Groundwater Quality Control) Regulations, 2011

treated by including reverse osmosis filtration system (RO machines) in the design and apparatus for the borehole system.

For microbial analysis, the most predominant bacterial organisms identified in the water samples collected from existing school boreholes sampled were faecal coliform (ranging from 2-32 cfu/ml), *Enterobacter aurogenes* (ranging from 1-9 cfu/ml), *Escherichia coli* (ranging from 1–19 cfu/ml) and *Salmonella spp* (ranging 1-4 cfu/ml). The high concentration of these organisms recorded in most schools especially in Jikamshi and Kogari could be attributed to the close proximity of the septic tanks to the borehole which could have led to infiltration of faecal waste into groundwater via seepage(see annex 14G for results). The minimum allowable distance between the septic tank and borehole water according to WHO standard is 18 meters (WHO, 2016). This is to reduce the risk of the potential source of contamination from the septic tank. The project design should include the use of Ultraviolet (UV) disinfection system which is a part of the water filtration system as part of the design for the borehole system. Another option is chlorination which is most commonly used in Nigeria as part of the borehole filtration system.

Erosion Issues

Minor erosion issues were identified in some areas including Jikamshi, Kusada, and un-reclaimed borrow pits worsening these issues in places like Tudun-Iya, Kadanya and Dambuna. This is of significance because erosion may affect any structure built in schools around such area and land degradation may worsen if contractors borrow sand from such eroded areas or un-reclaimed borrow pits for construction.

Waste Management Issues

Most of the schools dispose their wastes in a locally constructed incinerator. Although some use open dumping (11%) and burning (26%). Consequently, the project interventions will adopt suitable measures for managing all generated construction wastes, including electronic and electrical wastes through active collaboration with the Katsina State Environmental Protection Agency (KSEPA).

Social Baseline Conditions

Access Roads

Most of the proposed project sites have adequate access roads, however, in Yar-Unguwa Primary School, Kurfi LGA, the access road is restricted on both sides by farmlands to about 2.5 m. Accessing the proposed site may lead to encroachment into the farmlands of about 1 m on both sides. A more suitable alternative route was mapped out during the ESMP field exercise, the access route 1, Yar-Unguwa Primary school road, adjacent the school main entrance is a preferred route compared to access route 2, yar-unguwa community road which has farmland obstructions within Yar-Unguwa community (see figure 9) for illustration.

Socio-economic Baseline

Data for socio-economic survey was obtained using electronic platform (ODK Collect on the open source Kobotoolbox platform, which was administered during consultations and interviews in the schools/communities with school management and staff, community leaders, members, women, youth. 682 questionnaires (an average of 20 questionnaires per community) were administered across 62 communities (hosting 126 schools, with the remaining 24 schools not visited due to insecurity). The list of schools visited and communities surveyed are presented in annex 14Gand 14H respectively. Target respondents were selected based on

purposive sampling to ensure representation of women and youth in addition to community leaders, school staff. Detailed results are presented in section 4.5 while the summary of results indicates the following:

Age Profile

Age distribution of 23% (18–30), 42% (31–45) indicates the presence of local workforce for unskilled labour.

Household Size

Large household size (more than 6) of 55% shows that the communities are primarily characterized by large family sizes (dependents), mostly school age children. The intervention will help improve school participation and reduce the number of out of school children.

Occupation

About 50% of community members are involved in civil service, although most have farming as a secondary source of income or livelihood, while 20% are traders. This implies that any major impact on farmlands during the implementation works may significantly distort the livelihood balance within the communities

Community Structure

Most of the schools are well secluded from the community and thus there is less interaction from communities. The communities have a cohesive structure with mostly large family patterns (an average of 2 wives and more than 6 children). Every community has a leader the Magaji or Mai-Angwa (Ward Head or Village Head), Hakimi (District Head), who are also responsible for resolving grievances amongst community members. There are also women groups headed by Magajiya (women leader) and youth groups with representatives. In many cases, the school SBMC chairman will be the community leader, hence there is a level of accountability of the school management in the affairs of the school to the community.

Health

There are Primary Healthcare Centres in every LGA visited. There are also Government and private hospitals spread across the project areas. The common diseases the community people are faced with is typhoid and malaria

Waste Management

Current waste management practices across most locations are collective dumpsite (48%), composting (15%), open burning (26%) and open dumping (11%). Considering that construction activities may increase generated solid waste, the contractors will have to liaise with the Katsina State Environmental Protection Agency (KSEPA) to manage construction wastes.

Women Inclusion

With respect to women dynamics, across the communities, women are allowed to practice passive farming by employing laborers to work on their farmland. Women also stated that they are involved in major decisions in the community including education of their children. Female children are also allowed equal opportunity to go to school especially with the various programs been implemented by the Katsina state Government.

Security Concerns

1. Due to the current state of security unrest in the many parts of the country, about 21 areas in the state were identified by the SPIU and designated as high security risk areas due to banditry and kidnapping. The SPIU will need to implement the mitigation strategies as stated in section 4.5.7, a summary is presented below:
2. Ensure timely engagement of a Project Security Adviser in conjunction with the state Government and security apparatus like the police, Army, Nigerian Security and Civil Defense Corps (NSCDC). The Security Adviser is expected to conduct a robust risk assessment and develop security protocols for prevention and response. A framework is provided in annex 16.
3. For high-risk areas, it is recommended to use local existing labor for construction works, and existing school structures (principal and school management) for monitoring in those areas to avoid exposing new entrants to kidnapping and banditry attacks.
4. The SPIU should ensure all contractors/consultants engaged by the project and implementing parties such as SPIU/NPCU staff receive security training/ briefing coordinated by the Security Adviser before any site visits.
5. Contact number of key personnel of security infrastructure in the state and LGA respectively should be made available to all contractors/consultants and project personnel. Contact number of who to contact in the event of any incident should also be provided to project workers.
6. All security incidents emanating from the project locations/contractors/ consultants/PIU etc. should be reported to the Project Security Adviser and the State Project Coordinator immediately/ within an hour of the incident.
7. The response protocol will be defined by the Project Security Adviser/state Government should be triggered, including reporting to the Commissioner of Education and the Nigerian Police Force for due action.
8. The Project Coordinator to inform the National Project Coordinator and the World Bank within 24hrs of the incident including an incident report and what actions have been taken.

ES 5: Potential Impacts of the Proposed Project

The proposed project is expected to be largely beneficial to the beneficial communities and the state at large including:

- Increased enrolment of school children especially support to Girl child education.
- New infrastructure in JSS and SSS schools which will provide more conducive learning environment and also reduce travel distance to access schools.
- Construction of toilets and WASH facilities will promote hygiene and sanitation in the schools and thus better health status.
- The creation of short-term employment for skilled and unskilled workers during the construction phase.
- The Project will promote or increase the employment or recruitment of more female teachers to meet the demand of increased enrolment of students.
- It would improve job satisfaction for the teachers that would be working in a better school environment.
- It will promote productive parent involvement in the Katsina education system.
- The project will address issues associated with Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) such as conduct of Mapping of SEA/SH Service Providers, provision of Codes of Conduct for contractors and their workers etc., which will support the overall drive for

the state in prevention of SEA/SH related issues and provision of a response mechanism for survivors.

- Promote synergy amongst MDAs at the state level including Ministries of Education, Women Affairs, Environment, Health amongst others

However, the nature of civil work activities entailing the use of heavy equipment, earthworks and labour influx will inevitably predispose the bio-physical and social components of the environment to varying degrees of negative impacts such as temporary noise, air pollution and disturbance of activities, increased solid waste burden, occupational health & safety risks, community health & safety risks, potential sexual exploitation and abuse/sexual harassment (SEA/SH) risks, child labour, conflicts between workers and community/schools and security risks such as banditry are anticipated. A summary of the potential negative environmental and social risks/impacts and mitigation measures are presented as follows:

Table ES2: Potential Negative Impacts and Mitigation Measures

Potential Negative Impacts	
Environmental Impacts	**Mitigation**
1. Land clearing activities could lead to loss of vegetation cover and soil erosion 2. Dust generation from movement of vehicles and equipment on untarred access routes to sites could cause air pollution 3. Noise pollution from movement of vehicles and machineries/equipment operations 4. Sourcing of construction materials such as sand, clay, gravels will lead to impacts related to sand mining and extraction of gravel from unlicensed quarries 5. Risk of aquifer over-exploitation and pollution of ground water resources due to borehole drilling. Risk of underground water pollution if borehole is situated too close to septic tanks for the toilet facilities 6. Waste generated from construction activities such as cement, wood, iron rods etc. could lead to environmental pollution if poorly managed. This could also lead to public health concerns especially for the students 7. Electrical and electronic wastes such as electrical wires, sockets etc. could lead to toxicity if poorly managed. Burning of e-waste and debris as a disposal/management procedure may increase the risk of global warming and climate change 8. Poor maintenance of toilet and WASH facilities could lead to damage of facilities and environmental pollution especially from poor sewage management. This could lead to air, land and underground water pollution	1. Limit land clearing to specific zone needed for the construction work. Replant or revegetate trees/shrubs 2. Wet earth roads to reduce dust during movement of vehicles especially in built up areas 3. Install noise mufflers on heavy duty equipment 4. The contractor should ensure sourcing of earth materials from registered quarries and licensed construction vendors with appropriate quarry lease to prevent illegal sand mining 5. Drilling of borehole should comply minimum specifications WHO WASH standard on borehole Drilling. 18m distance from septic tanks (WHO), use of sanitary seal. Care must be taken in the handling and storage of all drilling fluids, oils, greases and fuel on site. 6. Ensure proper sorting; storage and final disposal of waste, liaise with KSEPA or a licensed waste operator. 7. Ensure recycling of e-waste and recyclable materials through approved recycling facilities to conserve resources 8. VIP toilets are recommended as opposed to water closets especially in schools with less water availability. School management to prepare a maintenance schedule in conjunction with the Ministry of education, sewage to be evacuated periodically in liaison with KSEPA
Social Impacts	**Mitigation**
1. Disturbance of academic activities and communities due to construction activities such as movement of vehicles/materials/equipment to site and civil works/operation of machinery on-site 2. Community health and safety risks from	1. Construction should be maximised during off peak periods/ weekends/holiday. Ensure all vehicles and machines undergo service before being brought to site with continuous regular maintenance 2. Avoid night hours for fleet movement, use

movement of equipment and vehicle to site which could lead to accidents for community members, students and staff. Increase in traffic and delay time, disturbance of market and religious activities due to movement of vehicles/materials/equipment to site	trained drivers, ensure drivers do not use substances, comply with fleet management standards, vehicles should not be overloaded with materials, use of flagmen and safety cautions in built up areas, avoid movement in market areas on market days, limit movement during religious activities, restricted access to be placed at construction sites etc
3. Encumbrances in some sites on the access routes due to farm activities which could lead to loss of livelihoods. Loss of lands/ livelihoods to owners of crops that will be affected by land acquisition or teachers farming on portions of school land (details in table 10 of this report)	3. Allow for crops to be harvested before construction commences where possible, Resettlement Action Plan (RAP) will be prepared to address impacts
4. Conflicts may arise from presence of foreign workers in the communities who may abuse cultural norms or display unruly/unaccepted behaviours	4. All contractors' workers to be sensitized and sign Code of Conduct (CoC) and zero tolerance for sexual relation with students, staff, community
5. Material and equipment stacking could restrict access for students and community members	5. Limit parking zone for equipment and materials to designated staging area
6. Labour influx may induce SEA/SH risks, risk of STIs/STDs for community members, students, and staff. Influx of Camp Followers[3] could also increase the presence of sex workers in the communities	6. SPIU to sensitise school staff, Community leaders, women group, youth group on SEA/SH preventive measures and response plan
7. Conflicts may arise with community members/ school from contractors and followers competing for scarce resources such as water, toilet facilities, health facilities etc.	7. Contractors are encouraged to engage local workforce especially as unskilled labor and provide basic amenities for workers like water, health, toilets etc.
8. Vulnerable groups could be further disadvantaged by not benefitting directly from the project either as engaged labor or disenfranchised during operations of school facilities if there are no provisions for inclusion	8. Contractor to ensure fair and inclusive recruitment processes and avoid discrimination. The PIU to ensure the designs targeted at People with Disabilities such as ramps are implemented
9. Sourcing for unskilled labour may lead to risks of child labour and increase dropout during construction activities. This could further predispose children to health & safety risks, Violence Against Children (VAC) etc.	9. The SPIU and school management to sensitise stakeholders on zero tolerance to child labor. Contractor to ensure that children and minors are not employed directly or indirectly on the project, this will be closely monitored by the SPIU, SBMC, supervision consultants
10. Poor labour and working conditions especially wages for community workers could lead to grievances	10. Contractor to comply with and implement the Labor Management Plan in the ESMP including implementing fair wages as approved by the PIU social officer, safe work conditions, provision of PPEs etc.
11. Grievances could arise from non-payment of rental fees and poor usage of facilities by the contractors such as staging areas, campsites etc.	11. Contractor to ensure fair compensation for renting of staging areas/ campsites in conjunction with the PIU and signed agreement with owners of such properties with all terms and conditions duly documented
12. Security Risks: project workers including NPCU, SPIU, Consultants, contractor workers could fall victim of kidnap, banditry, insurgency, social conflicts etc	12. Security mitigation strategies have been included in section 4.5.7 of this ESMP, in addition the PIU to work with the project security adviser to develop a robust security management plan for the project in conjunction with the state Government and the state security agencies including the police, Army, Nigerian Security and Civil Defense Corps (NSCDC)

3 who follow the incoming workforce with the aim of selling them goods and services, or in pursuit of job or business opportunities

Occupational Health and Safety Impacts	Mitigation
1. Occupational health & safety risks from civil works and operation of machinery could lead to injuries, accidents for workers 2. Poor labour and working conditions could lead to ill-health and grievances 3. Unfair recruitment processes could cause grievances, discrimination etc. poor or discriminatory wages could also lead to grievances and legal action 4. Workers could be exposed to disease outbreaks such as COVID, monkeypox 5. Contractor workers may be exposed to security risks such as banditry, kidnapping etc.	1. Implement site specific Occupational Health and Safety Management Plan which should include Hazard Communication Procedures (HAZCOM); Job Hazard Analysis (JHA); OHS Training program, Provision of adequate first aid, first aiders, PPE, safety signages, Ensure qualified HSE officer on every team 2. Contractor to provide a safe and conducive work environment including basic amenities like portable drinking water, food, WASH facilities, rest area for workers 3. Recruitment processes should be fair, nondiscriminatory and the terms and conditions of employment including wages, work hours, rest hours, benefits, sanctions should be clearly indicated in the conditions and understood by all parties 4. Implement COVID and monkeypox prevention and response strategies including provision of nose masks, hand wash facilities, isolating sick workers and ensuring they get medical attention 5. Appropriate security measures to be put in place in line with the project security management plan (see section 4.5.7)

ES 6: Grievance Redress Mechanism (GRM)

The GRM is developed as a multiple-level design (project location, state, and national levels) and will address diverse suggestions & complaints, and involve activities like logging, tracking, and resolving project related grievances. Chapter 6 provides the GRM which has been prepared in a manner that integrates both the formal and informal/traditional approach to grievance redress mechanism. This includes the use of Grievance Redress Committees (GRCs), complaint boxes, dedicated phone lines to channel and resolve grievances. The GRCs will be constituted at the project site level, SPIU level, State Steering Committee level and NPCU level. Complainants will also be informed of their right to seek judicial redress if they remain dissatisfied with the resolutions reached. A GBV-GRM protocol is also included to provide a process for channeling GBV related complaints which is handled different from the non-GBV related grievances due to the confidential nature of the complaints.

ES 7: Environmental and Social Management and Monitoring Plan

Mitigation measures for potential negative impacts have been described in section 7.6 including mitigation and monitoring costs, responsibilities for mitigation and monitoring, method and frequency for effective monitoring. The summary of the cost for the implementation of the ESMP is presented in the Table ES3 below. The total costs of the ESMP including costs for mitigation and monitoring and capacity building is estimated as: Thirty-Nine Million, Four Hundred and Ninety Thousand Naira (N39,490,000.00) only. In addition, a stand-alone Resettlement Action Plan (RAP) will be prepared to address impacts related to Land Acquisition, assets/crops affected by project activities.

Table ES3: Summary of ESMP Implementation Budget

S/N	Item	Responsibility	Estimated Cost (NGN)
1.	Mitigation	Contractor	N25,300,000 ($60,817.38)
2.	Monitoring	SPIU, MDAs	N5,150,000 ($12,379.8)
3.	Capacity Building	SPIU/Contractor	N4,300,000 ($10,336.54)
4.	Disclosure Costs	SPIU	N1,150,000 ($2764.4)
5.	**Sub – Total**		N35,900,000) ($86298.07)
6.	Contingency	10% of Sub-Total	N3,590,000 ($8,629.808)
	TOTAL		**N39,490,000.00 ($94,927.88)**

* *Majority of the costs will be the responsibility of the contractor as will be embedded in the contractors BOQ.*
1USD = N 416as at 10/09/2022

ES 8: Stakeholder Consultations

As part of the ESMP, consultations were held with the SPIU, project communities, LGA representatives and MDAs (Education, Women Affairs, Environment, Federal Road Safety Corps) between 14th – 30th June 2022. Participants at the community meetings comprised of the ward heads, village heads, traditional rulers, community leaders, religious leaders, women and youths, while those in the school meetings included school principals & management staff, teachers and students.

The consultations served as platforms to elicit information, questions, and concerns relevant to the project. It also provided the opportunity for project beneficiaries to contribute to both the design and implementation of the project activities and further ameliorate the likelihood for conflicts. Concerns raised by the stakeholders are documented and incorporated in chapter 9 of this report and aided the development of mitigation and/or enhancement measures and also the design of the GRM. Major discussions were on the eagerness of the beneficiaries on the commencement of the project and their commitment and support to AGILE. Potential negative impacts were also discussed, and the participants provided useful mitigations in some instances which were embedded in the mitigation plans in this ESMP.

ES 9: Summary and Recommendations

Based on the findings from the ESMP, the potential negative impacts can be mitigated/managed with strict adherence to the measures stated in this ESMP. The costed ESMP will need to be embedded in the contractors BOQ to ensure implementation costs are adequately budgeted for by the contractors. Additionally, the Katsina AGILE SPIU will ensure the E&S staff and agencies involved in the monitoring activities are adequately trained in line with the capacity building plan in the report, which has budgetary allocations. Key recommendations are provided in chapter 9.

Chapter One – Introduction

1.1 Background

The Government of Nigeria initiated the Adolescent Girls Initiative for Learning and Empowerment (AGILE) in collaboration with the World Bank as part of the Government's long-term education reform agenda to adequately address the identified constraints of accessing and completion of Secondary education facing adolescent girls in Nigeria. The project 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 will work with the federal government and support the education programs of participating states of Borno, Ekiti, Kaduna, Kano, Katsina, Kebbi and Plateau (figure 1) to improve secondary education opportunities amongst girls.

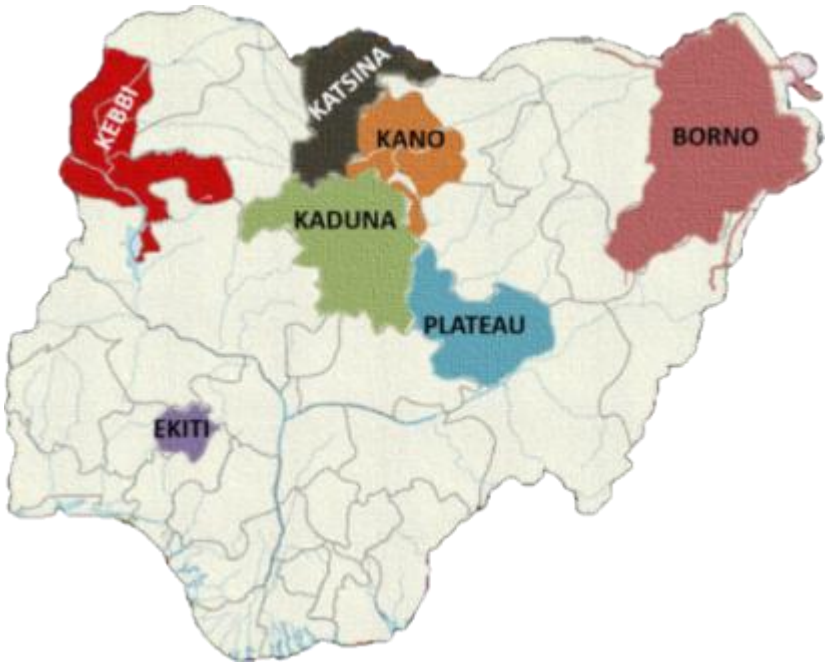


Figure 1: AGILE Participating States in Nigeria

The Project Development Objective (PDO) is to improve completion of quality secondary education and comprehensive life-skills training for adolescent girls.

The project consists of three components with about eight (8) sub-components which seeks among others to improve the quality and efficiency of social service delivery at the state-level thereby promoting social inclusion and strengthening governance and public sector management, with gender equity and conflict sensitivity as essential elements of good governance.

Component 1: Safe and Accessible Learning Spaces

- Subcomponent 1.1. Creating new safe learning spaces in Secondary Schools
- Subcomponent 1.2. Improving existing infrastructure in Secondary Schools i.e., School Improvement Grant (SIG)

Component 2: Fostering an enabling environment for Girls

- Subcomponent 2.1: Promoting social and behavioral change through communications campaigns, engagement with traditional rulers, and advocacy
- Subcomponent 2.2a: Empowering girls with critical life skills and knowledge for navigating adulthood
- Subcomponent 2.2b. Digital Literacy Skills and Remote Learning Platforms
- Subcomponent 2.3: Providing financial incentives to the poorest households

Component 3: Project Management and System Strengthening

- Sub-component 3.1: System strengthening for sustainability and technical Assistance
- Sub-component 3.2: Project Management, Monitoring and Evaluation (M&E)

In Katsina State, the rationale for the project is in line with the PDO as stated above, the AGILE intervention will help to address some of the challenges in Katsina with respect to Girl child education in the state which includes access, poverty, early marriage, and infrastructure, cultural and religious misconceptions.

1.2 Description of the proposed intervention

As part of the project intervention under sub-component 1.1, Katsina AGILE State Project Implementation Unit (SPIU) has selected 150 schools to implement construction of school structures for both Junior Secondary Schools & Senior Secondary Schools (JSS & SSS). These works will be carried out in 34 LGAs in Katsina State in line with the design schedule per site stated in Table ES1 above and table 4 of this report respectively, with the details of design and proposed project activities contained in chapter 3 of this report. The construction work will be carried out in 2 phases (phase 1 has 76 schools while phase 2 will follow afterwards with 74 schools), each phase typically last between 6-18months.

Broadly, the proposed project activities include:

- Construction of classrooms
- Construction of toilets and WASH facilities
- Construction of administrative blocks
- Construction of multi-purpose halls
- Drilling of boreholes
- Construction of Overhead tanks

1.3 Rationale for ESMP

The environmental risk classification for AGILE is moderate while the social risk classification is substantial. Based on the World Bank Environmental and Social Framework (ESF), there are 6 applicable Environmental and Social Standards (ESSs). While the project will largely create positive impacts, nevertheless, some negative impacts are expected in relation to the civil works activities described above, entailing new construction. However, no cumulative, unprecedented, and large-scale adverse impacts are envisaged to result from the activities that will be financed under this project. Potential negative environmental and social impacts/risks associated with such projects may include waste generation such as general construction wastes, e-waste, sanitation waste etc. which may cause environmental pollution, loss of vegetation from land clearing, noise/air pollution, accidents from movement of equipment and materials to site, occupational health & safety risks, risks associated with labour influx such as Sexual

Exploitation and Abuse/Sexual Harassment (SEA/SH), increase in STIs/STDs, child labour among others.

In compliance with the World Bank ESF, the environmental and social impacts/risks that are likely to occur, can be addressed through compliance with appropriate mitigation measures. Consequently, an environmental and social screening was conducted for the proposed construction works which identified the need to prepare an Environmental and Social Management Plan (ESMP) to identify and mitigate potential negative environmental and social impacts.

1.4 Objectives of the ESMP

The ESMP is required to guide Katsina AGILE in ensuring that project implementation is in line with the Nigerian Environmental Protection laws and the World Bank ESF, in a bid to avoid negative environmental and social impacts, reduce or mitigate them to acceptable levels. The ESMP includes a detailed plan with identified impacts and mitigation measures for negative impacts including responsibilities and costs, as well as a defined monitoring plan with monitoring responsibilities and costs.

1.5 Approach and Methodology for Preparation of the ESMP

The preparation of the ESMP was guided by the Nigeria Environmental Impact Assessment Act (EIA Act), AGILE Project Environmental and Social Management Framework (ESMF) and the World Bank ESF. Field studies were undertaken in June 2022 to identify the baseline conditions of the project area and the environmental and social risks and impacts associated with the project.

Consultations were held with various stakeholders including school management, community representatives, women, youth and students as detailed in chapter 9 of this ESMP.

Chapter Two – Administrative & Regulatory Framework

This ESMP is prepared in consonance with relevant Katsina State and Federal Government environmental and social policies, laws, regulations, and the World Bank ESF. This section outlines the specific environmental and social frameworks that guides the AGILE project.

2.1 Applicable International, Federal, and State laws and regulations

Table 1: Applicable National and State Policies and Applicability to AGILE Project

Regulatory Framework	Description
National Policy on the Environment, 1989 (Revised 2016)	The policy identifies key sectors requiring integration of environmental concerns and sustainability with development and presents their specific guidelines. This includes regulations for the construction sector which governs the proposed AGILE construction of new infrastructure in schools. This ESMP contains measures aimed to comply with this policy by protecting the environment including air, water, soil, flora, fauna, people.
Environmental Impact Assessment (EIA) Act CAP E12 LFN 2004	The Environmental Impact Assessment (EIA) Act CAP E12 LFN 2004 provides guidelines for activities of development projects for which EIA is mandatory in Nigeria. According to the act, category II projects such as the AGILE Project may require only a partial EIA/EMP, such as the preparation of this ESMP, which will focus on mitigation and Environmental planning measures.
National Environmental Standards and Regulations Enforcement Agency (NESREA)Act, 2007	NESREA was established by NESREA Act No 25 of 2007 as a parastatal of the FMEnv. The Act was reviewed in 2018 to strengthen limiting gaps and enable effective operations. The Agency has developed several regulations and guidelines for environmental protection for various sectors including noise, waste, sanitation, construction which all apply to the AGILE project
National Environmental (Sanitation and Wastes Control) Regulations (2009)	The purpose of the Regulation is the adoption of sustainable and environment friendly practices in environmental sanitation and waste management to minimize pollution. The Instrument amongst others makes provisions for the control of solid wastes and hazardous wastes. This ESMP contains a Waste Management Plan which will ensure compliance with this regulation
National Environmental (Soil Erosion & Flood Control) Regulations (S.I. 12) 2011	The purpose of these Regulations is to establish technically feasible and economically reasonable standards and procedures to achieve appropriate level of management and conservation practices to abate soil erosion, siltation, and sedimentation of the waters of Nigeria, due to soil erosion and flood aggravated by non-agricultural earth-disturbing activities. Clearing and excavation works under this project will be guided by measures stipulated in this ESMP
National Environmental (Noise Standards and Control) Regulations, 2009	The objective of the Regulations is to ensure maintenance of a healthy environment for all people in Nigeria, the tranquillity of their surroundings and their psychological wellbeing by regulating noise levels. The Instrument prescribes maximum permissible noise levels for construction as 60dB (A) and 40dB(A) for day and night respectively. Measures to achieve this has been adequately captured in the ESMP
National Environmental (Air Quality Control) Regulations, 2014	Includes recommended measures to prevent, minimize, and control air emissions from combustion processes fuelled by gaseous, liquid and solid fossil fuels designed to deliver electrical or mechanical power, steam, heat, or any combination of these, regardless of the fuel type, and stipulates limits for various parameters
National Environmental (Surface water and	The purpose of these regulations is to restore, enhance, and preserve purpose. The physical, chemical and biological integrity of the nation's

Regulatory Framework	Description
Groundwater Quality Control) Regulations (2011)	surface waters, and to maintain existing waters.
National Environmental (Ozone Layer Protection) Regulations, (2009)	Specific provisions with respect to this project includes prohibition of the release of ozone-depleting substances from any equipment or machinery. Measures to achieve this has been adequately captured in the ESMP
National Environmental (Construction Sector) Regulations (S.I No. 19), 2011	The purpose of these regulations is to prevent and minimize pollution from construction, decommissioning and demolition activities in the Nigerian environment. It stipulates that new projects in the construction sector shall apply cost-effective, up-to-date, efficient, best available technology, to minimize pollution to the barest degree practicable. In addition, every operator or facility shall carry out an EIA and submit an EMP for new projects or modification including expansion of existing ones before commencement of activity.
National Policy on Education (NPE), 2013	The Policy is established to ensure proper administration, management and implementation of the educational system in all areas of the society. It provides the direction for educational activities with the aim of achieving three (3) major objectives which are as follows: (a) to equalise educational opportunities for all children, (b) to provide adequate education for all handicapped children, and (c) to provide opportunities for exceptionally gifted
University Basic Education Act, 2004	This Act provides for compulsory, free universal basic education for all children of primary and junior secondary school age in the Federal Republic of Nigeria. There is a National Council on UBE, State Universal Basic Education Board (SUBEB), and Local Government Education Authority (LGEA).
Nigerian Land Use Act of 1978	The law establishes the legal framework for government expropriation of land from individuals and communities, when it is required for "overriding public interest/good". It prescribes the circumstances under which the State can revoke rights of occupancy to the land and the compensation provisions that are required. For project sites where this is applicable, the Resettlement Policy Framework (RPF) which has been approved by the Government and the Bank for the AGILE project will be the guidance document to stipulate how such issues will be addressed.
National Policy on Occupational Safety and Health, revised 2020	This policy was approved by the Federal Executive Council (FEC) in September 2020. It provides a guide for voluntary compliance and serves as a basis for occupational health and safety (OHS) programs for workers even under such development projects like AGILE. An OHS Plan has been provided in the ESMP.
Nigeria Labour Law (2004)	The Labour Act of 2004 set the standard for the minimum amount of naira a worker in Nigeria is supposed to make. In 2020, the National Minimum Wage was set to ₦30,000.00 per month. A Labour Management Procedure (LMP) was approved for the project and specific actions to comply with this policy are included in this ESMP
Workers Compensation Act (2010)	The Workmen's Compensation Act makes provisions for the payment of compensation to workmen for injuries suffered in the course of their employment. This has been captured in the LMP and referenced in this ESMP
Katsina State Environmental Protection Laws: Katsina State Waste Management Act	Provides for the effective development and maintenance of sanitation in all areas of the State including proper disposition of excavated silt or earth and other construction materials after any construction project or repair works, open burning of wastes is prohibited with stipulated penalties Facilitate protection, restoration, conservation, development and management of the environment and natural resources for equitable, sustainable socio-economic development. Including waste and sanitation management. The project will engage the Katsina State Environmental

Regulatory Framework	Description
	Protection Agency (KSEPA) in waste management and periodic monitoring of environmental parameters as stated in the ESMP monitoring table.
Katsina Child Right Protection Policy, 2017	The act covers key aspects of the lives of the children and adolescents. It is divided into survival rights, development rights, participation rights, and protection right. The development means although the Child Right Protection defines a child as a person below the age of 18 and seeks to protect them from abuse; it will still not protect certain under aged persons from being married off. This policy supports the AGILE project in Katsina state
Katsina Social Protection Policy, 2020	A mix of policies and programs designed for individuals and households to prevent and reduce poverty and socio-economic shocks by promoting and enhancing livelihoods and a life of dignity. The policy seeks to enhanced reduction of inequality and inequity as well as the provision of social incentives. Some of the social protection interventions implemented by the state include: Conditional cash transfers (CCTs) for Girls education RTIF emergency nutrition programme This policy supports the AGILE project in Katsina state

2.2 Gender and Social Specific Policies

- **Child Rights Act (2003)**

The Child's right Act provides a platform for protection of children against child labour, exploitation and other forms of social vices. It 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, honour, reputation, health and prevention from indecent and inhuman treatment through sexual exploitation, drug abuse, child labour, torture, maltreatment and neglect to a Nigerian Child. Katsina AGILE will strictly adhere to this legislation in line with mitigation measures in the ESMP table. This will be enforced and monitored by the Supervision Consultant, SPIU, other relevant bodies as identified in the ESMP.

- **The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) (2012)**

Adopts a broad categorization of persons with disabilities and reaffirms that all persons with all types of disabilities must enjoy all human rights and fundamental freedoms. It clarifies and qualifies how all categories of rights apply to persons with disabilities and identifies areas where adaptations have to be made for persons with disabilities to effectively exercise their rights and areas where their rights have been violated, and where protection of rights must be reinforced. The project design for construction works has made considerations for People with Disability (PWD) by inclusion of ramps to access buildings. Furthermore disable-friendly toilet facilities have been recommended in this ESMP.

- **National Gender Policy (Revised 2022)**

The revised National Gender Policy 2021 – 2026 approved in March 2022, promotes gender equality, good governance, and accountability across the three tiers of government in the country. Provides a framework for ensuring gender inclusion and sensitivity in developmental

plans and programs at the national and sub-national levels. It sets standards for good governance, accountability and being socially responsive to the needs of vulnerable groups. The goal includes the elimination of cultural/ religions 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 poverty in families; and eliminate the high risks linked to many harmful traditional cultural practices, which still put threaten the health of women. Katsina AGILE through the social safeguard/ GBV officer will ensure that there is gender consideration in every program and phase of the program, and also ensure the implementation of Gender Based Violence procedures.

- **National Policy on Gender in Basic Education (2006)**

  The specific objectives as relates to this project includes increasing girls access to education -To increase girls' enrolment in schools, retention, completion and performance of girls.

- **The Violence Against Persons Prohibition (VAPP) ACT 2015)**

  The VAPP Act was signed into law on 23rd May 2015. This act prohibits all forms of violence against private and public life and provides maximum protection and effective remedies for victims and punishment of offenders. 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 absent. In addition, Katsina State's bill for violence against persons and prohibition has passed second reading at the Katsina State House of Assembly (KTHA). Thus, Katsina AGILE will abide by the provisions of the VAPP Act and in addition, implement the GBV action plan prepared for the project included the Mapping of GBV service providers.

- **The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1985)**

  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. The social safeguard/ GBV officer will ensure that there is gender consideration in every program and phase of the program, and also ensure the implementation of Gender Based Violence procedures.

- **Other Relevant Human Protection Laws**

  a) International Treaties Relevant to GBV

  - Social Development Act [1974]
  - The International Covenant on Civil and Political Rights (ICCPR) (2004).
  - The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004).
  - The Convention on the Rights of the Child (CRC) (1990), and the Convention on the Rights of Persons with Disabilities (CRPD) (2012).
  - International Convention on the Elimination of all forms of Racial Discrimination (1976).
  - Abolition of Forced Labour Convention [1957]

- Convention Against Torture & other Cruel, Inhuman or Degrading Treatment or Punishment [CAT] 2001

b) Regional Treaties Relevant to GBV

- The African Charter on Human and Peoples' Rights (ACHPR) (1982).
- The Convention on the Rights of the Child [CRC]-1990
- The African Charter on the Rights and Welfare of the Child (ACRWC) (2007).
- The Protocol to the ACHPR on the Rights of Women in Africa (the "Maputo Protocol") (2007).
- The National Action Plan for the Implementation of United Nations Security Council Resolution 1325 (2009).

2.3 World Bank ESS Applicable to the AGILE Project

There are six applicable Environmental and Social Standard (ESS) for the project. The summary of these ESS and their relevance to the project are summarized in table 2 below.

Table 2: Applicable World Bank ESS

ESS	Reason for Application of Standard to the Project	How it will be addressed by the project
ESS 1: Assessment & Management of Environmental & Social Risks & Impacts	• Proposed project activities under sub-component 1.1 will include new infrastructure works in the selected schools to include construction of new classrooms, replacement of roofs, windows, provision of hygiene & sanitation facilities, etc. Potential environmental concerns associated with such construction works include pollution from waste generation, 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. • The project also poses some potential social risks which is rated substantial, including risks associated with labour influx such as Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) unwanted pregnancy, Sexually Transmitted Infections (STIs)/Sexually Transmitted Diseases (STDs), competition for resources, grievances, social conflicts and exclusion of vulnerable groups from participating in the project.	This ESMP is a site-specific plan prepared to address the identified risks and includes other plans like waste management plan, OHS plan, community health & safety plan amongst others. A GBV action plan is also available for Katsina and Mapping report for Service Providers.
ESS 2: Labour and Working Conditions	The project will make use of various categories of workers as defined by ESS2, who may face unfavourable terms and conditions of employment, discrimination, child labour, forced labour, grievances and unsafe working conditions.	Labour Management Procedures (LMP) consistent with ESS2 and National Labour Laws for all categories of workers has been developed, while specific Labour Management Plan and OHS Plan has been prepared as part of this ESMP
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.	This ESMP includes a waste management plan with measures to minimize and manage the risks and impacts associated with resource

ESS	Reason for Application of Standard to the Project	How it will be addressed by the project
	Inefficient use of resources like water and energy, use of environmentally un-friendly techniques during construction and operation could also pose risks.	efficiency and pollution management. In addition, based on the project design red bricks will be used for buildings in flood prone areas due to its resilient nature
ESS 4: Community Health and Safety	Schools and project communities may be exposed to risks from project activities during pre-construction, construction, operation phases including accidents/incidents, pollution, increase in spread of diseases, GBV/SEA etc.	This ESMP has identified potential community health & safety risks and provided mitigation measures in line with the World Bank Environmental, Health & Safety Guidelines (EHSG) A GBV action plan is also available for Katsina and Mapping report for Service Providers. In addition, Code of Conducts have been included in the ESMP to be signed by all contractor and their workers.
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	The project activities will largely not involve land acquisition, restrictions on land use, or involuntary resettlement. However, in some areas identified for the new construction works additional land space will need to be acquired. Also, there are some school staff who plant crops for subsistence on the portion of school land earmarked for new construction. However, these impacts are limited and in very few locations	A Resettlement Policy Framework (RPF) was prepared alongside the ESMF, which outlines procedures to address issues related to ESS5. Site-specific Resettlement Action Plans (RAP) and livelihood restoration plan will need to be prepared to address the impacts
ESS 10: Information Disclosure and Stakeholder Engagement	There are different categories of stakeholders associated with the project with varying degree of influence. These stakeholders will need to be 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.	A Stakeholder Engagement Plan (SEP) has been prepared and approved for AGILE which will be implemented by the project As part of the ESMP preparation stakeholder consultations were conducted as detailed in this report

2.4 Gaps between the Nigeria Laws and the Environmental and Social Framework (ESF)

This section provides a summary of the similarities and differences between the Nigeria Laws and the World Bank ESF

Table 3: Similarities and Differences between Nigeria Laws and the ESF

ESF	**Nigeria Laws**	**Similarities/ GAPs**
ESS1 Assessment and Management of Environmental and Social Risks and Impacts	Environmental Impact Assessment Act.	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 all categories of workers involved in the project. 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 International Labor Organisation (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, minimize or mitigate adverse impacts on human health and the environment. National Environmental Regulations has requirements for pollution prevention, discharge permits, etc.	Requirements for pollution prevention and waste management are similar, but the ESF contains additional requirements for improving efficient consumption of energy, water and raw materials, as well as other resources
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	Chapter 202 of Nigeria Land Use Act, 1990 is the legal basis for land acquisition and resettlement in Nigeria.	The issues on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement are not adequately covered in the Land Use Act. In addition, the Land Use Act is obsolete and the rates for compensation and eligible categories of affected persons will need to be reviewed by the Government
ESS10 Stakeholder Engagement and Information Disclosure	EIA Act, No. 86 1992 requires consultation of affected people, State or Local Government of the proposed	Gaps include guidelines on the identification of stakeholders and focus groups including the preparation of stakeholders' engagement plans and Grievance Redress Mechanisms, and

ESF	Nigeria Laws	Similarities/ GAPs
	activity, contains requirements for public disclosure of reports	entrenches stakeholder engagement throughout the life cycle of the project

Therefore, in all cases the more stringent laws will be adopted, which is the World Bank ESF as detailed in table 2 above.

2.5 Administrative Framework Relevant to the ESMP Implementation

The administrative framework responsible for environmental and social management for Katsina education project (AGILE) are as follows:

2.5.1 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 fulfil this mandate, a number of regulations/instruments are available, however, the main instruments in ensuring that environmental and social issues are mainstreamed into development projects is the Environmental Impact Assessment (EIA) Act CAP E12 LFN 2004as listed above. 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.

2.5.2 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.

2.5.3 Katsina State Ministry of Resource Development

The Katsina State Ministry of Resource Development was created to back up the mandates of Federal Ministry of Environment at the State level to facilitate good governance in the protection, restoration, conservation, development and management of the environment and natural resources for equitable, sustainable socio-economic development

2.5.4 Katsina State Environmental Protection Agency (KSEPA)

The Katsina State Environmental Protection Agency is aimed at addressing issues concerning environmental protection, monitor and control pollution and the disposal of solid, gaseous and liquid wastes generated by various facilities in the state. Katsina AGILE will work with them to

support effective waste management and periodic monitoring of environmental parameters as prescribed in the ESMP matrix table in this report.

2.5.5 National Council of Education (NCE)

It is the highest policy-making body for educational matters in the country. It consists of the federal minister of education and the state commissioners for education. It is assisted by the Joint Consultative Committee (JCC) which is made up of professional officers of the federal and state ministries of education. The committee advises the NCE on a wide variety of educational matters.

2.5.6 Federal Ministry of Education

The ministry has a mandate to use education for fostering development of all Nigerian Citizens to their full potentials, specifically:

- Formulate and co-ordinate a national policy on education
- Collect and collate data for purposes of education Planning and Financing
- Prescribe and maintain uniform standard of education throughout the Country
- Control and monitor the quality of education in the Country
- Harmonize educational policies and procedures of all the States of the Federation through the instrumentality of the National Council on Education (NCE)
- Effect co-operation in educational matters on an international scale; and
- Develop curricula and syllabuses at the National Level.

2.5.7 Katsina State Ministry of Education

The Ministry of Education is mindful that the provision of the necessary support services including school-feeding, books and uniforms, the refurbishment, upgrading and expansion of educational facilities and the training of personnel are paramount for the enhancement of education. The Ministry will ensure equitable access to quality and relevant education to all citizens of katsina regardless of sex, creed, ability or socio-economic status even under the AGILE project. The Ministry supervises Parastatals that provide Basic Education, Science and Technical Education, Teacher Education, Non-Formal Education (NFE), etc. Katsina, like any other state, has adopted all the existing policies in the education sector and is steadily implementing them. These include the UBE Act, the national minimum qualification of teachers as NCE in Basic Education, while the process of the adoption of Child Rights Act and the National Policy on Gender in Basic Education are on course

2.5.8 Katsina State Universal Basic Education Board

Katsina state Universal Basic Education Board is an Educational Agency under the supervision of the State Ministry of Education. The State Universal Basic Education Board (SUBEB) is a policy reform measure of the Federal Government of Nigeria, aimed at rectifying distortions in the basic education. In collaboration with stakeholders will create a conducive environment for quality teaching and learning through the provision of infrastructure, capacity building and support for LGEAs.

2.5.9 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's issues and issues affecting persons with disabilities and the elderlies. The Ministry also initiates policy guidelines and leads the process of ensuring gender equality and mainstreaming at both the national and international levels.

2.5.10 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 operates 36 State Labor Offices and the FCT, 23 District Labor Offices. The ministry is responsible for enacting laws regarding labour management including salaries/wages, freedom of association for workers amongst others.

2.5.11 Local Government Authorities

The Water Sanitation and Hygiene Departments at the LGA level will support the project in terms of waste management activities. While the Dispute Resolution Centres at the LGAs will also play a critical support role in grievance redress, specifically, a representative of this centre will be part of the Grievance Redress Committee at the project site level.

2.6 Institutional Arrangements for the AGILE Project

Federal Level Coordination: The National Project Coordinating Unit (NPCU) is responsible for the overall coordination of the AGILE project activities. The NPCU provides oversight on behalf of the Federal Ministry of Education and provide updates on project development to the Ministry and the World Bank. The NPCU has an Environmental and Social Unit which coordinates E&S compliance across all project states and periodic monitoring and supervision visits to the states. The NPCU relates with the World Bank environment and social management team for guidance.

State Project Implementation Unit: The SPIU at the state level is responsible for day-to-day project implementation activities, including procurement, disbursement, financial management (FM), and monitoring and evaluation (M&E) and environmental and social management. The SPIU reports directly to the commissioner of Education on issues related to project implementation through the State Project Coordinator. The Environmental and Social Unit will ensure environmental and social management compliance prior to and during project implementation.

Chapter Three – Project Description

3.1 Description of the Proposed Project

Katsina SPIU AGILE has selected 150 schools consisting of Junior and Senior Secondary Schools (JSS & SSS) across 34 Local Governments Areas for intervention works which will include new construction of classroom blocks, administrative blocks, toilets/sanitary facilities, science laboratories, multipurpose halls, and drilling of boreholes. There is an average of 4 – 6 schools per LGA, the schools will be divided in two phases 1&2, construction will commence in phase 1 schools which has 76 schools while phase 2 will follow afterwards with 74 schools as grouped by the SPIU. Each phase will have between 4-5 work packages, each package per contractor.

Table 4 below shows the design typology to be constructed in the junior and senior secondary schools respectively.

Table 4: Design Schedule per site

Junior Secondary Schools	**Senior Secondary Schools**
1 block of 4 classrooms (Bungalow design)	1 block of 4 classrooms (Bungalow design)
1 block of 6 classrooms (Story building design)	1 block of 8 classrooms (story building design)
Drilling of borehole & installation of accessories	Drilling of borehole & installation of accessories
2 blocks of 8 cubicle toilets (male and female respectively)	2 blocks of 8 cubicle toilets (male and female respectively)
	1 block of administrative block
	1 block of science laboratory
	1 multipurpose hall

3.2 Design Summary

Building Designs

The buildings (classrooms) to be constructed will include bungalows and storey buildings. The buildings will be made of cement and aluminum roofing sheets, however, red bricks are recommended to be used in flood prone areas due to their resilient nature, as part of the climate resilience strategy. Iron railings will also be used as protective guards and ramps will be included in the buildings including the WASH facilities.

It is recommended that the design/planned construction make provision for security lights in and around the school vicinity as way of protection of the structures/properties and movement in and around the school premises. Small circuit surveillance cameras (CCTV) are also recommended especially for boarding schools of high security risk areas.

It is also recommended that vegetative areas/green areas should be included in the design for the buildings to help promote a green environment and emission reduction.

Borehole Drilling Design Considerations

The average drilling depth (m) for boreholes in Katsina range between 40 – 50 m, while the water level depth ranges from 7 – 38 m as shown in figure 2 below.

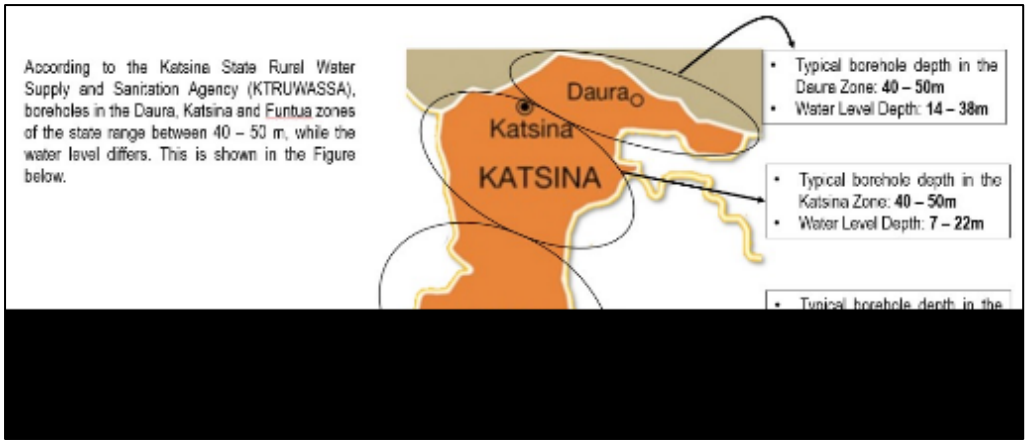


Figure 2: Borehole Specifications

The Engineering Design proposes the construction of a 1 HP solar powered pump boreholes with overhead tanks at 7 m and 5 m height for SSS and JSS schools respectively. Each pump station of 1 HP will be powered by six (6) panels of 250 w polycrystalline overhead solar panels. The state witnesses an average of 10 hours sunlight per day at an average temperature ranging from 26^{o}C to 38^{o}C, which is advantageous for the proposed design, harnessing the natural resource as an environmentally sustainable option, and reducing operational costs as well as climate change related impacts associated with using alternative power sources such as premium motor spirit (PMS) or diesel. (*Please note that the design is based on standard design of overhead solar powered boreholes for rural environments in Katsina State).*

Overhead tanks will be attached to the borehole to reserve the water when it is pumped from the borehole. The tanks will be plastic tanks (to avoid rust), with a capacity of 5000L, and will be at an elevated height of 6m. Periodic (half yearly) maintenance to remove sludge is recommended during the operation stage.

As part of design finalization based on the findings of the ESMP, the following should be noted:

- It is recommended that in areas with high acidic water content as identified in this ESMP, and as may be identified during the geotechnical studies for the borehole drilling, Sodium Carbonate and Sodium Hydroxide can be injected into the water system using a Peristaltic pump, which is preferred to neutralizing filters as they do not cause hardness in water.
- Include reverse osmosis filtration system (RO machines) in the design and apparatus for the borehole system in areas with high nitrate contents in water/soil
- Include the use of Ultraviolet (UV) disinfection system as part of the water filtration system in the design for the borehole system. Another option is chlorination which is most commonly used in Nigeria as part of the borehole filtration system, this will help prevent the growth of micro-organisms in the tanks, in addition to the periodic (half yearly) sludge removal and washing of the tanks.

3.3 Excerpts of the Engineering Design

Figure 3: Bungalow design of classroom block (3D Design) with ramp

Figure 4: Story building design of classroom block with ramp

Figure 5: Toilet of 8 cubicle VIP toilets with ramp

3.4 Project Activities

Table 5 below shows the various proposed project activities and staffing at the pre-construction, construction, and operation phases of the project.

Table 5: Project Activities and Facilities

No.	Project Phase	Activities	Labor / Staffing	Support Facilities
1.	Pre-Construction	• Site marking and pegging, • Site clearing • Mobilization of equipment and workers to site • Establishing of staging area and campsite	• Skilled labor (estimate of 5x150 sites = 750 nos) • Unskilled Labor (estimate of 10x150=1,500 nos)	• Staging Area for contractor equipment • Campsite (accommodation for workers) • Portable water and Sanitary Facilities including male and female toilets • Personal Protective Equipment (PPEs) • First Aid kits
2.	Construction	Excavation Installation of traffic signage and cautions on site Construction of facilities: classrooms, toilets, labs etc. Drilling of boreholes Demobilisation from site Removal of construction equipmen • Disposal of construction waste in general • Dismantling of staging area and exit from campsite	Skilled labor (estimate of 12x150 = 1,800 nos) Unskilled labor (estimate of 40x150=6,000 nos)	1. Staging area 2. Campsite 3. First aid kits (1 kit would serve 10 staff) 4. Construction water and materials 5. Sanitary Facilities (male and female toilets) 6. PPEs 7. Portable water for workers, food and security
3.	Operation and Maintenance	• Use of all constructed facilities: bore holes, classrooms, toilet and laboratory • Building maintenance • Maintenance of WASH facilities and sewage management	Skilled labor (estimate 3 x 150 = 450nos) Unskilled labor (estimate 9x150 = 1,350 nos)	• Water for WASH facilities • Maintenance Workshop • Maintenance equipment

3.4.1 Material Sourcing

Materials for the construction works shall be locally sourced by the Contractor. Materials such as cement, sand, stone, gravels, roofing sheets, wood, iron rods, aggregates shall be purchased by the contractors from existing materials markets in the state. The Contractor is encouraged to include borehole drilling as part of early project schedule to serve the construction activities and subsequently serve as the planned borehole for the school. Where this is not feasible, the contractor will identify and source water externally, in collaboration with the Katsina State Water Board (KSWB), outside the school environment to avoid competition for water resources with students and staff.

The contractors will ensure that wood is not sourced from protected forest areas/ nature reserves or vendors associated with such practices, rather they will purchase from licensed vendors/ sites as approved by the Katsina State Ministry of Resource Development. The SPIU will ensure this is clearly included in the contractual agreement. The contractors will also not be permitted to source sand from un-reclaimed borrow pits in some of the project communities such as GDSS, Tudun Iya, Kadanya GJPSS, Charanchi LGA and Dambuna PJSS, Charanchi.

3.4.2 Staging Area

The staging area for siting of the project office, storage of equipment and other machinery for the project works will be identified by the contractor in conjunction with the SPIU and the school/community. The potential impacts that may be associated with the siting and operation of the staging area have been identified alongside mitigation measures and included in the ESMP Matrix in chapter 7 of this ESMP. The following criteria will be adopted in identifying and managing the staging area:

- Not to be located within the school premises
- Be located outside the protection zone of watercourses (100 m)
- Be located within an acceptable distance from existing residential areas
- Not located in areas with intact vegetation
- The site must be cordoned off and access restricted to prevent accidents and unsupervised visitors
- The contractor must first obtain the necessary licenses and consents from the local authorities or from the owner of the needed area, including agreement on how the site should be handed over after use
- The contractor must submit for the prior approval of the Resident Engineer, the design for the staging area that are intended to be built
- The contractor shall take all measures and precautions to avoid any disturbance such as Noise, Vehicular Traffic and Reliance on community resources to the local communities
- The Contractor will ensure that all necessary sanitary facilities shall be provided for workers expected on site:
- Conducive office space with tables, chairs, drinking water, good aeration, food etc.
- Separate toilets for male and female with concrete and covered septic tanks
- Portable water with well-placed overhead tanks
- Wash basins and First aid kits

3.4.3 Campsite

Most workers will reside in the towns/urban areas and will mostly not require establishment of workers camps, however, some project sites are quite a distance (3-4hrs) from town hence

there may be need to establish campsite for workers at least 500 meters from the community (In conjunction with security intelligence and the project security adviser).The potential impacts that may be associated with the siting and management of a campsite have been identified alongside mitigation measures and included in the ESMP Matrix in chapter 7 of this ESMP. The following criteria will be adopted in identifying and managing the campsite:

- Not located in or around a school premises
- Not located in areas with intact vegetation
- Located within an acceptable distance from existing residential areas
- The contractor must first obtain the necessary licenses and consents from the local authorities or from the owner of the needed area;
- 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, such as noise, vehicular traffic, reliance on community resources etc. as a result of the project execution;
- Contractors and their workers (resident and non-resident) must be trained and sign code of conducts (sample in annex 7) against GBV/SEA/SH and other illicit behaviours;
- 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;
- The contractor must ensure that Separate rooms will be provided for male and female workers and that all necessary sanitary facilities complying with World Health Organisation (WHO) regulations will be provided for workers to include but not limited to separate toilets for male and female, portable water with well-placed overhead tanks, wash basins and concrete and covered septic tanks.

As part of measures for the management of labour camps, Annex 10 presents a detailed Campsite Management Plan (CMP) detailing measures for avoiding, reducing and minimizing impacts related to labour camps. The CMP also provides the responsibilities for enforcing and monitoring measures are strictly adhered to.

3.4.4 Material Sourcing and Borrow Pits

Materials for the construction works shall be locally sourced by the Contractor. Materials such as gravels, aggregates, chips, roofing sheets, iron rods etc. shall be purchased by the contractors from existing materials markets in the state. The Contractor will identify and source water externally, in collaboration with the Katsina State Water Board (KSWB), outside the school/project host communities. The Contractor shall not depend on or source for water for the construction works from the community water points so as not to adversely impact existing water sources.

The Contractor shall identify potential borrow pits in collaboration with the SPIU/ Katsina State Ministry of Resource Development, with materials that possess suitability for the construction works. The Contractor shall carry out requisite engineering tests on samples of the materials for the construction. The SPIU will ensure that the contractors comply with the following criteria to establish borrow pits:

- Inform and agree on location of borrow pits with the SPIU (Project coordinator, engineers, E&S officers) prior to civil works
- The proposed locations not to be in agricultural fields
- Locations should not be near schools or other public facilities
- Locations not along the proposed road (at least 20m from the shoulder of the road).
- Sufficient quality of soil and suitable earth as adjudged to be available by material quality test to be submitted to the SPIU engineers
- The coordinates, pictures, borrow pit management and reclamation plan for each borrow pit to be submitted to the SPIU
- The SPIU to confirm reclamation of pits after use to close to pre-use state as much as possible including proper documentation and pictures. Contractors should have a plan and budget in place for reclamation and should be duly included in their bid documents. A sample borrow pit management plan is provided in annex 12 of this ESMP.
- The SPIU will ensure adequate and documented transactional agreement between the contractor and the landowners.

3.4.5 Labour

The new construction project will make use of different categories of workers including:

- Direct workers (NPCU, Katsina AGILE SPIU, representatives of the various ministries including the project steering committee)
- Contracted workers: this will include the design & supervision consultant team and the civil work contractors to carry out the new construction works which will include civil engineers, builders, surveyors, HSE staff etc.
- Community workers: the contractors will make use of community persons as unskilled labour and also be encouraged to source skilled labour from the community, where the required expertise is available. An elected Community Based Management Committee (CBMC) will also be inaugurated to manage the AGILE project during the operation phase. This committee will consist of representatives from the community and the school management/staff.
- Primary suppliers are likely to include suppliers of construction materials including cement, sand, wood, stone, iron rods etc.

A Labour management plan has been articulated in annex 10 of this report in line with the approved AGILE Labour Management Procedures to guide issues of wages, welfare, health & safety, grievances etc.

Chapter Four – Description of Project Environment

4.1 Project Location

Katsina State is a state in the north-western geopolitical zone of Nigeria and consists of 3 senatorial districts namely Katsina South, Katsina Central and Katsina North, with a total of 34 local government areas (LGAs) has an estimated population of 7,831,300 (based on projections from 2006 census: NBS) and a land area of 24,235 km^2. It borders Kaduna State to the South, Jigawa and Kano States to the East, Zamfara State to the West and the Niger Republic to the North. The major tribes in the State are Hausa and Fulani and Islam is the predominant religion. Figure 6 below shows a map of the study area.

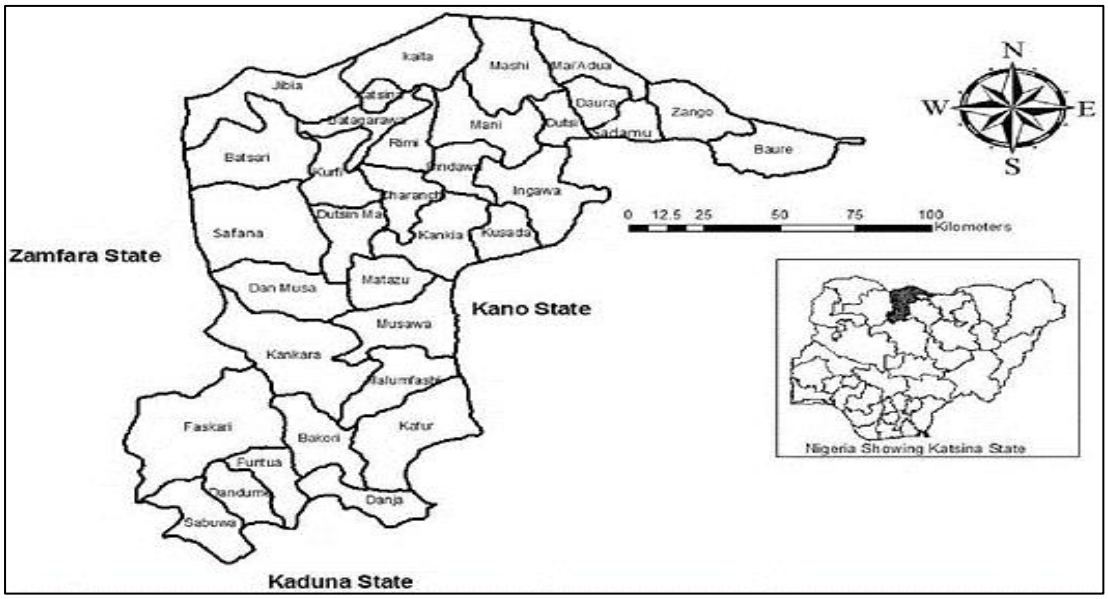


Figure 6: Map of Katsina State showing LGAs

4.2 General Description of School Environment

Generally, the proposed interventions will be constructed in existing primary or secondary schools. Out of 150 proposed interventions, 7% will be constructed on virgin lands or lands belonging to individuals, while 93% will be constructed in already existing schools within the state. Most of the interventions are targeted at rural and sub-urban communities with 80% located in rural/sub-urban areas, while 20% are in urban areas. Typically, the existing schools are made of cement blocks.

4.3 Environmental and Social Characteristics of the Project Environment

Table 6: Environmental and Social Characteristics of the Project Area

Features	Descriptions
Climate Conditions	The State extends from the tropical grassland known as the Savannah to Arid Zone to the North. Like any other part of the tropics, there are two main seasons; wet and dry season. Rainy season is larger in the southern part of the State where it lasts up to five months, while in the northern part of the State it lasts for four months.
Rainfall	Katsina state experiences extreme seasonal variation in monthly rainfall. The rainy season is experienced from the month of May and lasts until the month of October, with the least record of 0.5 inches. The highest amount rainfall in the state is recorded in the month of August reaching 6.3 inches.
Temperature	The peak of the heat season in Katsina is experienced between the month of March and early June. The hottest month of the year in the state is May, having an average high of 38oC and low of 26°C. The coldest season is between the months of December and January, at the lowest of 15°C and 28°C at the highest.
Humidity	The State experiences extreme seasonal variation in humidity. The muggier period of the year in Katsina state is experienced from the month of late April to late October, with the least humidity at 25%. December is the month with the fewest muggy days.
Topography & geology	Generally, the topography of the project area comprises of flat and rolling terrains. Topographically, Katsina state is primarily characterized by modest elevation variations, with a maximum elevation change of 154 ft and an average elevation above sea level of 1,687ft. The state is covered by cropland, sparse vegetation, bare soil, and grassland.
Soil	The soil type across the project environment is lateritic, clayey, and loamy in nature, and are closely packed. The lateritic and clay resources are often harnessed by the community members for local construction works within their homes and communities including moulding of mud blocks for building purposes. Loamy soils are harnessed for farming purposes.
Vegetation	Katsina State is generally characterized by semi-desert, sahel-savannah vegetation cover. The project area is mainly characterized by scarcely dispersed vegetation cover and shrubs. Common vegetation along the project corridor include shea butter; Neem tree (dogon-yaro), Baobab tree (Kuka Tree); Rimi (Ceiba Pentandra); and Giginya tree identified.
Water Resources	The State is blessed with abundant underground water, dams and streams, which are used for domestic purposes as well as dry season farming. There are no surface water bodies within the proposed project sites, however, there are evidence of episodic water retainment. Community members source water for domestic and agricultural purposes from groundwater (wells & boreholes) and rainwater (collected using household containers during rainy season).
Land Use	Main land use activities are for agricultural purposes in the rural communities, specifically, farming. In a few schools, some portion of school lands earmarked for new construction are being used for subsistence farming by school staff. While in some locations land will have to acquire from community/individual by the project/Government for the new construction.
Flooding	Torrential rainfall with sporadic and increasing intensity orchestrated by climate change and human factors have, in recent years, led to severe flooding and erosion in most parts of Katsina State, including Funtua, Jibia, Malumfashi and some part of Katsina Metropolis. Flooding and erosion issues are worsened by anthropogenic activities, most of these have to do with building on waterways, incessant tree felling as well as change in land use/ land conversion for buildings. These phenomena often lead to loss of lives and

Features	Descriptions
	property, farmlands, roads, commercial and educational structures.
Agriculture	The major crops produced in the State are millet, guinea corn, groundnut, cotton, maize, beans, rice and wheat. The State is the largest producer of cotton in Nigeria. Livestock production is also a major occupation of the people.
Industries	The State has a number of industries such as the Dana Steel formerly Katsina Steel Rolling Company, Saulawa Machines and Fabrication Factory, Hamada Carpets, Funtua Textiles, Shema Industries Dutsin-ma, Funtua Cotton Seeds Crushing Company, Katsina Oil Mill, Funtua Bottling Company, Northern Dairies Funtua, Funtua Burnt Bricks Factory, Kankara Kaolin Processing Company, Funtua Cotton Ginnery, Malumfashi Cotton Ginnery, Katsina Flour Mills, e.t.c.
Education	At present the State has three Universities, namely Umaru Musa Yar'adua University, Alqalam University and Federal University Dutsinma. Other Institutions of Higher Learning include Hassan Usman Katsina Polytechnic, FCE Katsina, Isa Kaita College Dutsinma, Yusuf Bala Usman College of Legal Daura, School of Basic Studies Funtua, e.t.c.
Road networks & means of transportation	The road networks leading to the communities are mostly tarred. However, in most of the communities, the road leading to the proposed project site are earth roads. The roads are used by pedestrians, cyclist, and motorists. Other means of transportation identified within the communities include the use of animals for transportation and farming purposes.
Major economic activities	The main stay of economic activities within the communities includes trading and agriculture including crop farming and animal husbandry.
Community Leadership structure	The community leadership structure includes the Mai-Anguwa (Ward head), Magaji or Dakachi (Village head), Hakimi (District head), and Sarki (Emir). These leaders usually resolve grievances within the project communities from the lowest level (village head) to the highest level (Emir). However, in a broader perspective, the State has a Council of Chiefs made up of the Emir, Waziri, Chief of Staff and Ministers in the State and this council govern State affairs.
Community Clan and Associations	Sullubawa Clan. - A Fulani clan and the current ruling houses in Katsina belongs to the clan and Dallazawa clan. The major tribes in Katsina State are Hausa and Fulani, and the languages spoken are hausa and Fulfulde. Associations within the communities/LGA include Youths development association of katsina state – (YODAKS), Miyetti -Allah, National Council of women society (NCWS), Association of Local Midwifery (Ungwan zoma) and Mothers Associations.
Security structures	The security apparatus present in the state and with operational presence across the communities are the Nigerian Police Force (NPF) and the Nigerian Security and Civil Defence Corps (NSCDC). Although there is presence of the Nigerian military in some communities with significantly high insecurity concerns, the NPF and the NSCDC have operational presence across all the communities.

4.3.1 Environmental Issues in Katsina State

Katsina State's major environmental challenges include erosion, desertification, drought, flooding and wood scarcity as only about 12 percent of the total area covered by the state is forested with standing trees: the northern part of Katsina is the most vulnerable area to desertification and is covered by soil having the highest sand depth while the southern part of

the state was found to be the least affected by desertification, however the later experience more of flooding and erosion issues.
The state also has a problem of solid waste management which abounds not only in the urban areas but equally a burden in the rural settings. As a result, farmlands, access roads, bridges and other facilities continually get clogged by solid waste thereby restricting movement of humans and goods.

4.3.1.1 Erosion Issues in Project Locations

The continuous land-use practices in some areas including un-reclaimed community borrow-pits in Tudun-Iya, Kadanya and Dambuna, predispose such areas to environmental issues such as erosion. Although this is not prevalent across all project areas, issues of minor-medium erosion were identified in some schools (Community Day Secondary School in Jikamshi and Government Pilot JSS Kafarda have erosion areas at the proposed construction site) as shown in figure 7 below. This information is important to advice the use of alternative site for proposed construction in these schools or inclusion of erosion control works in the design for these schools, while contractors will avoid burrowing sand from the degraded areas in the communities stated.

Figure 7: Identified Erosion issues

4.3.1.2 Waste Management in Target Schools

Most of the schools dispose their wastes in a locally constructed incinerator (see Figure 8 below for typical waste management system across the schools). Although some use open dumping (11%) and burning (26%)4. Consequently, the project interventions will adopt suitable measures for managing all generated construction wastes, including electronic and electrical

4 Socioeconomic baseline conducted indicates the percentages as presented in Table 7 of this chapter.

wastes through active collaboration with the Katsina State Environmental Protection Agency (KSEPA).

Figure 8: Typical local incinerator for waste management

4.4 Physico-Chemical Analysis of Environmental Baseline Assessment

As part of field assessment, baseline studies on the physio-chemical and biophysical components of the environment were conducted. This included in-situ sampling and ex-situ (taking samples to the lab for analysis). Samples were sent to Umaru Musa Yar Adua University Central laboratory in Katsina for analysis. This will enable the project establish baseline data which will serve as benchmark for monitoring. Criteria for site selection was random; however, it was intentionally spread across all LGAs to ensure adequate representation. The team also looked out for any sign of existing pollution or prevalent health challenges (which was not identified). Chain of custody was adopted to transport and deliver samples to the laboratory to ensure integrity of samples (see annex 15 for sample chain of custody used). The tools used for sampling are also presented in annex 14. The analysis is presented below:

4.4.1 Noise Assessment

Most of the proposed schools are within enclosed spaces which are void of industrial activities or activities that will increase the noise levels in the areas. Noise levels were measured in 51 sample locations across the various LGAs, using an Extech Sound Level Meter (in-situ), daytime noise levels ranged from 24dB in the more rural areas to 48dB in the more semi-urban areas due to presence of more human activities such as motorbikes and vehicles, which are all below the FMEnv limit of 60dB and there will be no construction activities after work hours/at night. The list of sites and noise levels are presented in annex 14A. Mitigation measures against noise disturbance have been stated in this ESMP including fitting of heavy machinery with noise mufflers and avoid work at night, to ensure compliance with the national standard[5] of 60dB (A) by day and 40dB (A) by night respectively.

4.4.2 Air Quality Assessment

Air quality was measured in-situ using BH – 4S – Portable multi gas detector to measure Volatile Organic Compound (VOC), SPM 2.5 and SPM 10 in 44 random locations across the various LGAs as shown in annex 14B. The air quality analysis of the project area indicates that the air quality in the project area is generally good as parameters were within the FMEnv permissible limit. This largely traceable to the fact that there are no high industrial activities, or vehicular movement within the school environment such as to significantly impact on the ambient air

5 National Environmental (Noise Standards and Control) Regulations, 2009

quality. The results were all below FMEnv permissible levels[6], VOC ranged from ND – 0.09 (FMEnv limit of 0.1), SPM2.5 ranged from 10 – 27 (FMEnv limit of 35) and SPM 10 ranged from 25 – 65 (FMEnv limit of 150). Annex 14 shows details of all sample locations and results.

4.4.3 Water Quality Assessment

There are no surface water in the project sites. Underground water samples were taken from 43 boreholes in sites across the LGAs as presented in annex 14C. , based on random sampling. The water was collected in clean amber colored bottles. In-Situ water quality was conducted for some parameters such as PH, Temperature, Conductivity, Total Dissolved Solids, using Tri-Meter, while laboratory analysis was conducted for other parameters discussed below. Chain of custody was maintained in transporting and delivering the samples to the lab to maintain sample integrity at Standard Temperature Pressure (STP) and all samples were delivered on the same day of collection. The values of physicochemical properties of analysed groundwater samples are mostly within the FMEnv limit[7]; (i) Conductivity values ranged from 683S/cm [2] - 9583S/cm, which are below the FMEnv limit of 1000, this may be attributed to the fact that the water is not directly exposed to industrial activities as it is from boreholes. (ii) Values for PH were below FMEnv limit of 6.5-8.5mol/L in Tsadoji in Sandamu LGA and AUMPS Daddara in Jibia LGA which was 6mol/L and 6.1mol/L respectively indicating slight acidity. Acidic water can cause corrosion in plumbing pipes and exposes water to copper, zinc, and even lead to correct this, Sodium Carbonate and Sodium Hydroxide can be injected into the water system using a Peristaltic pump, which is preferred to neutralizing filters as they do not cause hardness in water. (iii) Values for hardness were slightly above the FMEnv limit of 200mg/l in Dambuna (227mg/l) and Kufan Agga (233mg/l) which may be due to naturally occurring sedimentary rock and calcium bearing minerals, as these values are not too high, they do not pose any significant health risks. (iv) Values of nitrate was slightly above the FMEnv limit in Kayauki(12), Jino(12.4) in Batagarawa LGA, Bindawa (12.24), Dan-Marke (12), Doro (12) in Bindawa LGA, Kadanya (12.98), Dambuna (12) in Charanchi LGA, Shema (12.62) in Dutsinma LGA, Kogari (12) in Matazu LGA, Shinkafi (20.86) in Katsina LGA, Matallawa (12.29), Dugul A (12.48) in , Ingawa LGA, AUMPS Daddara(20), GJSS Daddara(14) in Jibia LGA, Dargage (12.65) in Zango LGA, Kwantawaram (12.2), Kabomo(12.9) in Bakori LGA, and Kufan Agga (20) in Kurfi LGA, which can be attributable to use of fertilizers to improve agricultural yields (most people in the rural areas are involved in some form of farming and harness fertilizers to boost agricultural yields). High levels of nitrate in drinking water can increase the risks of cancer-causing chemicals, this can be treated by including reverse osmosis filtration system (RO machines) in the design and apparatus for the borehole system.

For microbial analysis, the most predominant bacterial organisms identified in the water samples collected from the school boreholes were Faecal Coliform (ranging from 2-32 cfu/ml), Enterobacter Aurogenes (ranging from 1-9 cfu/ml), Escherichia coli (ranging from 1–19 cfu/ml) and Salmonella Spp (ranging 1-4 cfu/ml). The high concentration of these organisms recorded in most schools especially in Jikamshi and Kogari could be attributed to the close proximity of the septic tanks to the borehole which could have led to infiltration of faecal waste into groundwater via seepage (see annex 14D for results). As part of borehole design, the minimum allowable distance between the septic tank and borehole water according to WHO standard is 18 meters (WHO, 2016), thus Contractors should adhere to this, as it will reduce the risk of the potential source of contamination from the septic tank. The project should include the use of

6 National Environmental (Air Quality Control) Regulations, 2014

7 National Environmental (Surface and Groundwater Quality Control) Regulations, 2011

Ultraviolet (UV) disinfection system which is a part of the water filtration system as part of the design for the borehole system. Another option is chlorination which is most commonly used in Nigeria as part of the borehole filtration system.

4.4.4 Soil Quality Analysis

Composite soil samples were collected from 51 sites in the LGAs as shown in annex 14E, using soil auger into air-tight polythene bags and were taken to the laboratory for analysis. Chain of custody was maintained in transporting and delivering the samples to the lab to maintain sample integrity. All values for physico-chemical properties for soil analysed (TDS, Conductivity, Hardness, NO_3, SO_4, Cl, Mg, Fe, Pb, Cr and Zn) are within the FMEnv limit. There is a uniform pattern of bacteria distribution in the soils including E-Coli (2.1-4.92), *Bacillus spp* (2.5-7.53), *Psuedomonas spp* (10-27) and *Salmonella Spp* (5.12-11.56) as shown in annex 14F. The distribution is however, closely linked with the occurrence of organic matter. At 0-15 cm depth, soil is rich in organic matter and this layer accordingly harbors the maximum bacterial population. The bacterial counts were higher than the fungal counts. Depending on soil structure and the various physicochemical parameters, the types of bacteria vary in different soils, detailed results are as shown in annex 14.

4.5 Social Baseline Conditions

4.5.1 Access Roads

Most of the proposed project sites have adequate access roads. However, in Yar-Unguwa Primary School, Kurfi LGA, the access road is restricted on both sides by farmlands to about 2.5 m. Accessing the proposed site may lead to encroachment into the farmlands of about 1 m on both sides. Alternative routes are also constrained by farmlands as shown in Figure 9 below. Access route 1, Yar-Unguwa primary school road which is adjacent to the school gate is a preferred entrance route compared [illegible]2 through the community, which has more constraints on both sides and less wi[illegible] farmlands will be addressed in a RAP.

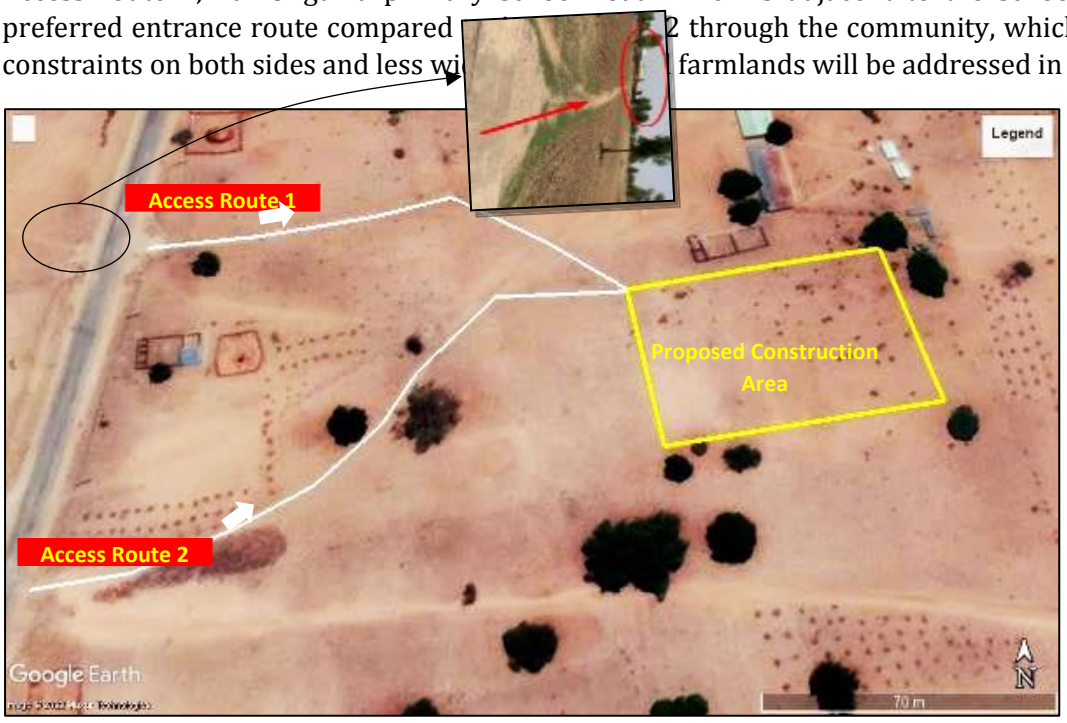


Figure 9: Access Route for Yar-Unguwa Primary School, Kurf

4.5.2 Cultural Sites

The proposed site for the construction of Dambuna PJSS is on a virgin land with a grave at one corner. It is noteworthy that the grave falls within the Right of Way (ROW), which the contractor is expected to give from the expressway, hence, this will not be impacted. See Figure 10 below. The SPIU should ensure that the contractor for this site complies with the ROW so this grave is not affected.

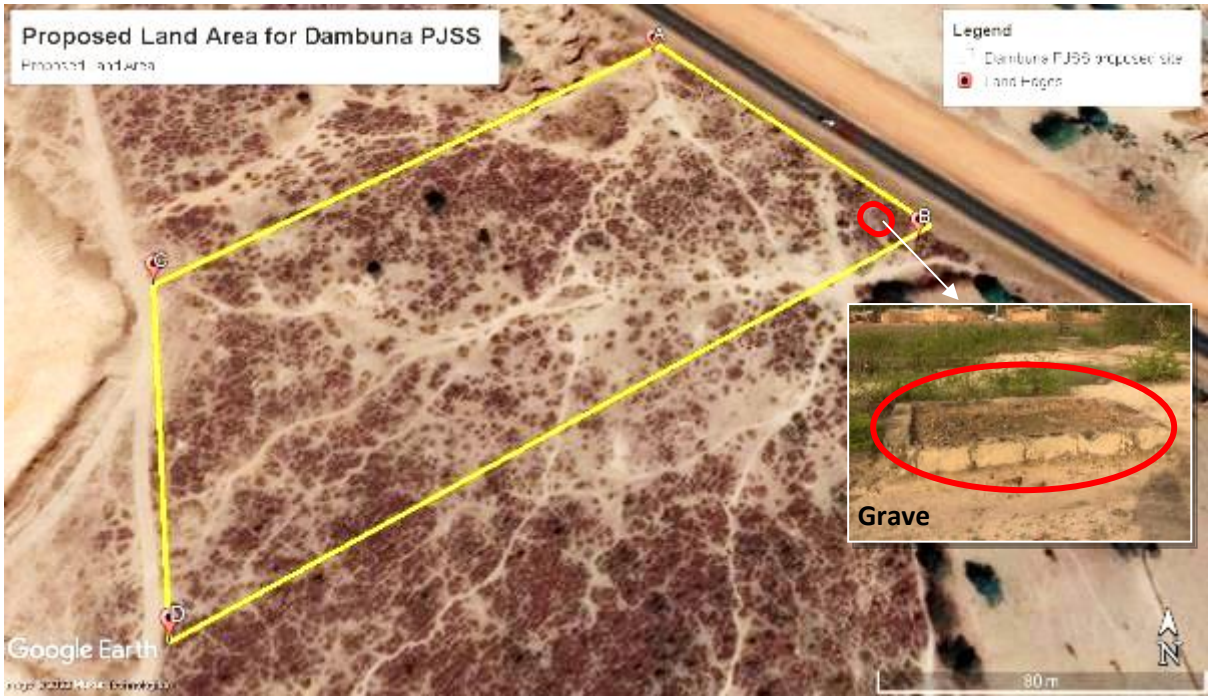


Figure 10: Proposed construction site for Dambuna PJSS showing grave

4.5.3 Socio-economic Baseline

Data for socio-economic survey was obtained using electronic platform (ODK Collect on the open source Kobotoolbox platform, which was administered during consultations and interviews in the schools/communities with school management and staff, community leaders, members, women, youth. 682 questionnaires (an average of 20 questionnaires per community) were administered across 62 communities (hosting 126 schools, with the remaining 24 schools not visited due to insecurity). The list of schools visited, and communities surveyed are presented in annex 14Gand 14H respectively. Target respondents were selected based on purposive sampling to ensure representation of women and youth in addition to community leaders, school staff. The summary of socioeconomic condition of the project area is presented in the table 7 below.

Table 7: Summary of Socio-economic Baseline Data

No.	Item	Percent	Remark
	Gender Distribution Male: Female:	 85% 15%	This is indicative of the lean availability of women capacity or labour force within the communities, as demonstrated in the lean female teachers' presence across most of the schools.
	Age Distribution 18 - 30	 23%	The age distribution indicates the presence of local workforce for unskilled labour, and a small

No.	Item	Percent	Remark
	31 - 45 46 - 55 Above 55	42% 23% 12%	percentage of age vulnerability due to presence of the elderly.
	Marital Status Married Single Widowed Divorced	 73% 26% 0.4% 0.6%	This indicates that the communities are mainly family-based communities, with few percentages of singles. Children from these homes will be beneficiaries of the proposed interventions.
	Household size Small (1 – 3) Medium (4 – 6) Large (More than 6)	 21% 24% 55%	This shows that the communities are primarily characterized by large family sizes (dependents), mostly school age children. The intervention will help improve school participation and reduce the number of out of school children by increasing proximity to school, thereby reducing the cost or burden of daily transportation to/fro school by parents or guardians.
	Literacy level Islamiya (Islamic School) Primary School Secondary School OND/NCE HND/Degree Postgraduate None	 20 5 16 38 17 2 1	This shows the presence of significant number of literates within the community. This will help drive the objective of improving school participation for the girl child through the AGILE intervention. Furthermore, it indicates that some level of skilled labour may be sourced from the communities.
	Ethnicity (Languages) Fulani only Hausa only Hausa & Fulani	 2% 92% 6%	The lingua franca of the communities is Hausa language. The Fulani groups also exist. Adequate consideration should be given to both groups during engagement of labour force for unskilled labour.
	Occupation Civil Servant Farmer Trader	 50% 30% 20%	Respondents are involved in civil service, although most have farming as a secondary source of income or livelihood. This implies that any major impact on farmlands during the implementation works may significantly distort the livelihood balance within the communities.
	Income Earners 1 2 3 and above None	 35% 16% 27% 22%	Although most of the families are large, the number of income earners are not commensurate in the families. This is indicative of financial strain, which may lead to increase in out-of-school children if the cost of accessing education is high, including transportation to schools.
	Average Monthly Income More than N30,000 N0 - N10,000 N10,000 - N20,000 N20,000 - N30,000	 45% 18% 19% 18%	Most of the respondents earn below the minimum wage (N30,000). This is indicative of the economic vulnerability index (EVI)8 of the communities. Hence, any adverse impact on economic sources and sources of livelihood may be significant.
	Water Supply Commercial Borehole Private Borehole Wells Government Supply	 60% 20% 15% 5%	Most communities depend on boreholes as their primary source of water. In all schools visited, the major water source is borehole, though in many locations the water is not sufficient for the entire school use, hence more boreholes are needed

8 As used in this report, **Economic Vulnerability Index (EVI)** refers to the economic capacity of a community and her members indicated by the average monthly income of community members, and as compared to the minimum wage of the country. The EVI is used in this case to measure the potential impact level or rating of an impact on the livelihood sources of community members from project related activities. Also, it shows the beneficial impact of employment opportunities that such intervention opportunities may provide to the locals.

No.	Item	Percent	Remark
			especially to provide water for the toilets.
	Sanitation Facilities Water Closet Water Closet & Pit Latrine Pit Latrine Open Defecation	 5% 2% 90% 3%	Pit latrine is the most used type of toilet in the project area and also in the schools. The implication for the project is that contractors should ensure to provide sanitary facilities during implementation phase, so as not to exacerbate any existing sanitary conditions within the communities.
	Waste Management Collective Dumpsite Composting Open Burning Open Dumping	 48% 15% 26% 11%	Construction works may increase generated solid waste. The contractors will have to liaise with the State EPA to manage construction wastes.
	Healthcare Facilities Primary Healthcare Centres Government Hospitals Private Hospitals	 85% 15%	There are Primary Healthcare Centres in every LGA visited. There are also Government and private hospitals spread across the project areas. The common diseases the community people are faced with is typhoid and malaria
	Source of Energy National grid Generator Kerosene lantern	 25% 60% 15%	Electricity is available from national grid but is not stable, this is supplemented by use of generator in most cases and kerosene lanterns. Energy for cooking is primarily sourced from firewood and charcoal.
	Transport Okada Motorbikes) Cars Trucks Camel/donkey	 50% 30% 15% 5%	Major means of transportation in the areas is commercial motorcycle (*Okada*) for conveying people and farm produce. Cars/trucks are also used very frequently. A few interior areas make use of animals to transport produce and materials

4.5.4 Community Structure

Most of the schools are well secluded from the community and thus there is less interaction from communities. The communities have a cohesive structure with mostly large family patterns (an average of 2 wives and more than 6 children). Every community has a leader the Magaji or Mai-Angwa (Ward Head or Village Head), Hakimi (District Head), who are also responsible for resolving grievances amongst members. There are also women groups headed by Magajiya (women leader) and youth groups with chosen representatives. In many cases, the School Based Management Committee (SBMC) chairman will be the community leader, hence there is a level of accountability of the school management in the affairs of the school to the community.

4.5.5 Gender norms

Across the communities, women are allowed to practice passive farming by employing laborers to work on their farmland. They are more involved in processing of produce such as rice and maize, and petty trading. Some of the younger girls engage in tailoring. Women also stated that they are involved in major decisions in the community including education of their children. Female children are also allowed equal opportunity to go to school especially with the various programs been implemented by the Katsina state Government. In the urban areas there are many female teachers in schools even more than the male counterparts in some schools, however, the schools in the rural areas have only few female teachers because most of the educated females who reside in the urban areas do not want to leave their families for teaching in the rural areas, and unfortunately most of the females in the rural areas are dedicated to family and raising their children, without the required teaching qualifications.

With respect to GBV issues and accessing services, women stated that they do not have such issues amongst them, however, where there are cases on partner violence it is reported to the village head to resolve, though this rarely occurs because of religious and cultural standards. They also stated that there are Primary Health Care Centres in every LGA which is accessible to the women and services received are mainly maternal healthcare, minor ailments like malaria, typhoid, cough but they do not have supplies of things like rape kits, post-exposure prophylactics, emergency contraception, etc., as these are not things that are usually requested or required.

4.5.6 Vulnerable Groups

Vulnerable groups identified during the field assessment are presented below. The criteria for selection included: (i) easy predisposition to SH and SEA, contracting STIs and STDs or unwanted pregnancies (social vulnerability); (i) socioeconomic status; (ii) age (persons above 60 years); and (iii) family size

- **School girls/ Female school staff/Teenage and Adolescent Females in the community: Potential risks of SEA/SH issues,** contracting STIs, STDs or unwanted and/or early pregnancies due to mingling with migrant workers, especially at the pre- construction and construction phases.

- **Women and Children:** who reside or offer petty trading services within project communities. They could be faced with the need to engage in activities such as petty trading and hawking and may be at risk to SH and SEA from project workers.

- **Elderly (>60years)/Persons with Disabilities/Widows:** these may experience greater difficulty in navigating their way if there are restrictions to access during the construction phase of the project. They may be confined to a location until the road is reopened. Furthermore, they may be at more risk from dust, emissions, and excessive noise during the project construction phase. Persons with Disabilities (PWDs) may also be excluded from accessing the benefits of the project either by discrimination as workforce or unable to use the newly constructed facilities if the design does not consider this.

- **Socioeconomic status:** those earning below the stipulated minimum wage (₦30,000) who may voluntarily/ involuntarily donate land to the project for new construction.

- **Family size**: those with a large family size may be more vulnerable to the project especially if they will be involved in loss of land, farm crops or loss of livelihood. This is because the economic impact will not affect only the PAP but the family members as well.

Associated negative impacts associated with vulnerable groups have been identified in chapter five below while mitigation measures are included in chapter seven.

4.5.7 Security Concerns

Due to the general current state of security unrest in the many parts of the Country, Katsina state also has areas which are designated as high security risk areas due to banditry and kidnapping, the list of 24 schools that fall in this category is available with the SPIU Project Coordinator. Where safety cannot be guaranteed such areas should be avoided. For the preparation of the ESMP, enumerators and contact persons residing within these locations were provided with checklists and training and used to obtain data on E&S sensitivities and other

requirements for the ESMP. Generally, the SPIU will need to implement the following mitigation measures for security:

Security Management Planning

- Ensure timely engagement of the project security adviser in conjunction with the state Government and security apparatus like the police, Army, Nigerian Security and Civil Defence Corps (NSCDC)
- The security adviser is expected to conduct a robust risk assessment and develop security protocols for prevention and response. A framework is provided in annex 16.
- The security management plan will be treated confidentially as not to fall in the wrong hands or public consumption.
- The construction design for the schools should include security lights in areas highly volatile to kidnapping, in and around the school vicinity as way of protection of the structures/properties and movement in and around the school premises (recommend solar powered flood lights) and CCTV camera to capture the vicinity
- There should be a monthly security briefing from the security adviser to the state project coordinator

Prevention Strategies

- For high-risk areas as stated in this report, and as may be identified subsequently, it is recommended to use local existing labor for construction works, and existing school structures (principal and school management) for monitoring in those areas to avoid exposing new entrants to kidnapping and banditry attacks `
- The PIU should ensure all contractors/consultants engaged by the project and implementing parties such as SPIU/NPCU staff receive security training/ briefing coordinated by the security adviser before any site visits
- Visiting teams to any site should ensure they liaise with the school management to inform them of their visit ahead of time

Response Strategies

- Contact number of key personnel of security infrastructure in the state and LGA respectively should be made available to all contractors/consultants and project personnel. Contact number of whom to contact in the event of any incident should also be provided to project workers
- The security response protocol for the project should be developed by the security adviser in conjunction with the state Government and the Project Coordinator should be aware of it.

Reporting of Incidents

- The security management plan should have a detailed reporting protocol which should include the following minimum requirements:
- All security incidents emanating from the project locations/contractors/ consultants/PIU etc. should be reported to the Project Security Adviser and the State Project Coordinator immediately/ within an hour of the incident
- The response protocol as will be defined by the project security adviser/state Government should be triggered, including reporting to the Commissioner of Education and the Nigerian Police Force for due action

- The Project Coordinator to inform the National Project Coordinator and the World Bank within 24hrs of the incident including an incident report and what actions have been taken.

Chapter Five - Potential Environmental and Social Risk Impacts and Mitigation

5.1 Introduction

This chapter presents the identification of potential environmental and social impacts associated with the proposed construction works, it also explains the methodology employed in accessing and analysing the potential risks.

5.2 Methodology and Techniques for Impact Identification and Analysis

Identification of potential adverse impacts of proposed intervention works (civil) was conducted through the use of impact checklists (see table 8 below, and annex 17A) and matrices for potential environmental and social impacts as presented below. Additionally, the findings of the screening report indicates likelihood of impact on livelihood which prompted further scoping for ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, using a checklist (see Annex 17B).

Table 8: General project and site information checklist

INSTITUTIONAL & ADMINISTRATIVE				
Country				
Project Title				
Scope of Project and Activity				
Institutional Arrangements (Name and Contacts)				
Implementation arrangements	Safeguard Supervision	Local Counterpart Supervision	Local Inspectorate Supervision	Contractor
SITE DESCRIPTION				
Name of site				
Describe site location			Attachment 1: Site Map [ ] Y [ ] N	
Who owns the land?				
Description of geographic, physical, biological, geological, hydrographic and socio-economic context and sensitivities	Presence of erosion, flooding, pollution, water sources, degraded land, waste management practices, presence of markets, religious buildings. Identification of livelihoods, public facilities, gender peculiarities, vulnerable groups and their potential interaction with the project			
Locations and distance for potential material sourcing				
LEGISLATION				
Identify national & local legislation & permits that apply to project activity				
PUBLIC CONSULTATION				
Conduct consultations, identify when/where the public consultation process took place				
INSTITUTIONAL CAPACITY BUILDING				
Will there be any need for capacity building?	[ ]N or [ ]Y if Yes, Attachment 2 includes the capacity building program			

Impact Analysis

Impact analysis was conducted using the following steps as presented in the flow diagram:

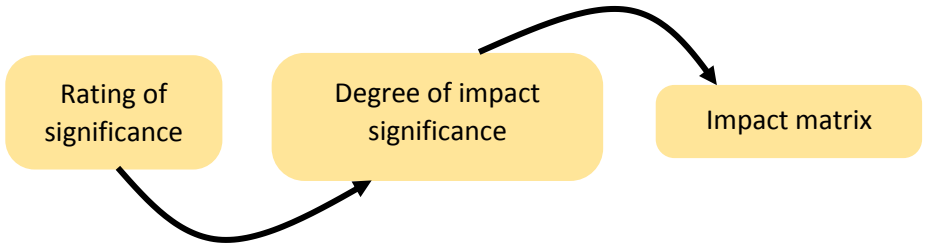


Figure 11: Impact rating flow chat

Impact A

	Potential consequences						
Likelihood	Positive	Negative					
		Hardly any	Little	Considerable	Great	Extreme	
High		Moderate	Moderate	Major	Major	Major	
Medium		Minor	Moderate	Moderate	Major	Major	
Medium		Minor	Minor	Moderate	Moderate	Major	
Medium		Negligible	Minor	Minor	Moderate	Moderate	
Low		Negligible	Negligible	Minor	Minor	Moderate	

5.3 Potential Environmental and Social Impacts

The proposed project is expected to be largely beneficial to the beneficial schools, communities and the state at large. The construction activities will largely take place within existing schools environs, however, the nature of civil work activities entailing the use of heavy equipment, earthworks and labour influx will inevitably predispose the bio-physical and social components of the environment to varying degrees of negative impacts

Table 9: Summary of Positive & Negative Impacts

Potential Positive Impacts	
1.	Increased enrolment of school children especially support to Girl child education
2.	New infrastructure in JSS and SSS schools which will provide more conducive learning environment and also reduce travel distance to access schools
3.	Construction of toilets and WASH facilities will promote hygiene and sanitation in the schools and thus better health status
4.	The project will promote human capital development which will support economic growth and poverty reduction
5.	It will create short term employment for skilled and unskilled workers during the construction phase
6.	Improve government support towards increase in female teacher enrolment
7.	Support behavioural change towards female education which will in-turn improve socio-economic status of women through better education
8.	The project supports achievement of some of the Sustainable Development Goals (SDGs) including SDG 1: No Poverty, SDG 4: Quality Education, SDG5: Gender Equality, SDG 6: Clean Water & Sanitation, SDG 9: Industry, Innovation & Infrastructure and SDG 10: Reduced Inequalities
9.	The project GBV prevention and response activities such as GBV Mapping, Code of Conducts etc. will support the overall drive for the state in prevention of SEA/SH related issues and provision of a response mechanism for survivors
10.	Promote synergy amongst MDAs at the state level including Ministries of Education, Women Affairs, Environment, Health amongst others
Potential Negative Impacts	
Environmental Impacts	**Mitigation**
1. Land clearing activities could lead to loss of vegetation cover and soil erosion	1. Limit land clearing to specific zone needed for the construction work. Replant or revegetate trees/shrubs
2. Dust generation from movement of vehicles and equipment on untarred access routes to sites could cause air pollution	2. Wet earth roads to reduce dust during movement of vehicles especially in built up areas
3. Noise pollution from movement of vehicles and machineries/equipment operations	3. Install noise mufflers on heavy duty equipment
4. Sourcing of construction materials such as sand, clay, gravels will lead to impacts related to sand mining and extraction of gravel from unlicensed quarries	4. The contractor should ensure sourcing of earth materials from registered quarries and licensed construction vendors with appropriate quarry lease to prevent illegal sand mining
5. Risk of aquifer over-exploitation and pollution of ground water resources due to borehole drilling. Risk of underground water pollution if borehole is situated too close to septic tanks for the toilet facilities	5. Drilling of borehole should comply minimum specifications WHO WASH standard on borehole Drilling. 18mdistance from septic tanks (WHO), use of sanitary seal. Care must be taken in the handling and storage of all drilling fluids, oils, greases and fuel on site.
6. Waste generated from construction activities such as cement, wood, iron rods etc. could lead to environmental pollution if poorly managed. This could also lead to public health concerns especially for the students	6. Ensure proper sorting; storage and final disposal of waste, liaise with KSEPA or a licensed waste operator.
7. Electrical and electronic wastes such as electrical wires, sockets etc. could lead to toxicity if poorly managed. Burning of e-waste	7. Ensure recycling of e-waste and

	and debris as a disposal/management procedure may increase the risk of global warming and climate change		recyclable materials through approved recycling facilities to conserve resources
8.	Poor maintenance of toilet and WASH facilities could lead to damage of facilities and environmental pollution especially from poor sewage management. This could lead to air, land and underground water pollution	8.	VIP toilets are recommended as opposed to water closets especially in schools with less water availability. School management to prepare a maintenance schedule in conjunction with the Ministry of education, sewage to be evacuated periodically in liaison with KSEPA
Social Impacts		**Mitigation**	
1.	Disturbance of academic activities and communities due to construction activities such as movement of vehicles/materials/equipment to site and civil works/operation of machinery on-site	1.	Construction should be maximised during off peak periods/ weekends/holiday. Ensure all vehicles and machines undergo service before being brought to site with continuous regular maintenance
2.	Community health and safety risks from movement of equipment and vehicle to site which could lead to accidents for community members, students and staff. Increase in traffic and delay time, disturbance of market and religious activities due to movement of vehicles/materials/equipment to site	2.	Avoid night hours for fleet movement, use trained drivers, ensure drivers do not use substances, comply with fleet management standards, vehicles should not be overloaded with materials, use of flagmen and safety cautions in built up areas, avoid movement in market areas on market days, limit movement during religious activities, Restricted access to be placed at construction sites etc
3.	Encumbrances in some sites on the access routes due to farm activities which could lead to loss of livelihoods. Loss of lands/ livelihoods to owners of crops that will be affected by land acquisition or teachers farming on portions of school land (details in table 10 below)	3.	Allow for crops to be harvested before construction commences where possible, Resettlement Action Plan (RAP) will be prepared to address residual impacts
4.	Conflicts may arise from presence of foreign workers in the communities who may abuse cultural norms or display unruly/unaccepted behaviours	4.	All contractors' workers to be sensitized and sign Code of Conduct (CoC) and zero tolerance for sexual integration with students, staff, community
5.	Material and equipment stacking could restrict access for students and community members	5.	Limit parking zone for equipment and materials to designated staging area
6.	Labour influx may induce SEA/SH/GBV risks, risk of STIs/STDs for community members, students and staff. Influx of Camp Followers9 could also increase the presence of sex workers in the communities. Sexual relations between contractors and female students could result in unwanted pregnancies encourage presence of sex workers in the project communities, failure to ensure community participation.	6.	SPIU to sensitise school staff, Community leaders, women group, youth group on SEA/SH preventive measures and response plan
7.	Conflicts may arise with community members/ school from contractors and followers competing for scarce resources such as water, toilet facilities, health facilities etc.	7.	Contractors are encouraged to engage local workforce especially as unskilled labor and provide basic amenities for workers like water, health, toilets etc.
8.	Vulnerable groups could be further disadvantaged by not benefitting directly from the project either as engaged labor or disenfranchised during operations of school	8.	Contractor to ensure fair and inclusive recruitment processes and avoid discrimination. The PIU to ensure the designs targeted at People With Disabilities such as ramps are implemented
		9.	The SPIU and school management to sensitise stakeholders against child labor during the preconstruction phase. Contractor to ensure that children and minors are not employed directly or indirectly on the project, this will be

9 who follow the incoming workforce with the aim of selling them goods and services, or in pursuit of job or business opportunities

facilities if there are no provisions for inclusion 9. Sourcing for unskilled labour may lead to risks of child labour and increase dropout during construction activities. This could further predispose children to health & safety risks, Violence Against Children (VAC) etc. 10. Poor labour and working conditions especially wages for community workers could lead to grievances 11. Grievances could arise from non-payment of rental fees and poor usage of facilities by the contractors such as staging areas, campsites etc. 12. Security Risks: project workers including NPCU, SPIU, Consultants, contractor workers could fall victim of kidnap, banditry, insurgency, social conflicts etc.	closely monitored by the SPIU, CBMC, supervision consultants 10. Contractor to comply with and implement the Labor Management Plan in the ESMP including implementing fair wages as approved by the PIU social officer, safe work conditions, provision of PPEs etc. 11. Contractor to ensure fair compensation for renting of staging areas/ campsites in conjunction with the PIU and signed agreement with owners of such properties with all terms and conditions duly documented 12. Security mitigation strategies have been included in section 4.5.7 of this ESMP, in addition the PIU to work with the project security adviser to develop a robust security management plan for the project in conjunction with the state Government and the state security agencies including the police, Army, Nigerian Security and Civil Defence Corps (NSCDC)
Occupational Health and Safety Impacts	**Mitigation**
1. Occupational health & safety risks from civil works and operation of machinery could lead to injuries, accidents for workers 2. Poor labour and working conditions could lead to ill-health and grievances 3. Unfair recruitment processes could cause grievances, discrimination etc. poor or discriminatory wages could also lead to grievances and legal action 4. Workers could be exposed to disease outbreaks such as COVID, monkeypox 5. Contractor workers may be exposed to security risks such as banditry, kidnapping etc.	1. Implement site specific Occupational Health and Safety Management Plan which should include Hazard Communication Procedures (HAZCOM); Job Hazard Analysis (JHA); OHS Training program, Provision of adequate first aid, first aiders, PPE, safety signages, Ensure qualified HSE officer on every team 2. Contractor to provide a safe and conducive work environment including basic amenities like portable drinking water, food, WASH facilities, rest area for workers 3. Recruitment processes should be fair, non-discriminatory and the terms and conditions of employment including wages, work hours, rest hours, benefits, sanctions should be clearly indicated in the conditions and understood by all parties 4. Implement COVID and monkeypox prevention and response strategies including provision of nose masks, hand wash facilities, isolating sick workers and ensuring they get medical attention 5. Appropriate security measures to be put in place in line with the project security management plan (see section 4.5.7)

5.4 Labour Influx, GBV Risks and Management Mechanisms

The project will involve construction which will require labour force, as it may be difficult to source especially skilled workers from the communities due to lack of technical skills and capacity. Thus, the labour force (total or partial) may be brought in from outside the project area. In many cases, this influx is compounded by an influx of other people ("followers") who

follow the incoming workforce with the aim of selling them goods and services, or in pursuit of job or business opportunities. The influx of workers and followers can lead to adverse social and environmental impacts which may include increased demand and competition for local social and health services, as well as for goods and services, which can lead to price hikes and crowding out of local consumers, increased volume of traffic and higher risk of accidents, increased demands on the ecosystem and natural resources, social conflicts within and between communities, increased risk of spread of communicable diseases such as HIV/AIDS, , increased rates of illicit behaviour and crime and risks of GBV/SEA/SH.

Gender-based violence (GBV)[10] – including sexual harassment, exploitation and abuse – is a prevalent feature in settings across countries where the World Bank operates. In order to understand and address more effectively key drivers that contribute to incidence of GBV, the recently released report by the Global GBV Task Force emphasizes the need to improve social risk assessment and specifically assessment and identification of key risks of Sexual Exploitation and Abuse (SEA) and GBV. In particular, the report highlights the extent to which existing World Bank-supported projects may compound broader contextual risks of GBV in a society, community or relationship that already contribute to prevalence of gender-based violence.

5.4.1 Measures taken to Mitigate GBV/SEA/SH Risks by the AGILE Project

The Katsina state Government has inaugurated a GBV State Committee as part of the State's commitment to prevent and respond to GBV issues. As part of the initiative to integrate GBV/SEA mitigation measures in AGILE project, a stand-alone GBV assessment report with defined action plan on mitigating these risks has been prepared for the project. Key actions to be implemented by Katsina AGILE include the following:

- Domesticate the mitigation measures in the GBV Assessment Report into a state specific costed GBV Action Plan
- Prioritize community engagements and integrate outcomes into the GBV action plan.
- Conduct community training on SEA/SH, reporting and accountability mechanisms
- Include information on SEA/SH prevention and mitigation considerations in all relevant documents such as ESMPs, C-ESMPs, Terms of Reference, bidding documents
- The state has mapped and identified 168 GBV service providers, the State will go ahead to sign MOUs with those with adequate capacity to support to the project, and ensure they are given orientation by the PIU GBV Officer on the project orientation and goals to ensure synergy. This list will subsequently be made available to all GBV actors at the school/community levels for effective liaison
- Ensure the inclusion of qualified GBV officer on the supervision consultant team and contractor's team respectively
- Ensure availability of an effective GBVGRM contained in AGILE GRM Manual (see section 6.7 of this ESMP for highlights). The GBV focal persons will also be trained by the project on handling

10 There are several forms of GBV, including i) intimate partner violence; ii) non-partner sexual abuse; iii) harmful practices; iv) human trafficking and v) child sexual abuse. It is expected that the country profile will highlight the most prevalent forms of GBV within each country. http://www.worldbank.org/content/dam/Worldbank/document/Gender/Arango%20et%20al%202014.%20Interventions%20to%20Prevent%20or%20Reduce%20VAWG%20-%20A%20Systematic%20Review%20of%20Reviews.pdf

cases in line with the GRM manual to ensure confidentiality, survivor-centred and referral of cases.

- The project will produce GBV Code of Conduct for all teachers and conduct training, GBV referral manuals will also be produced and distributed to all GBV focal persons in the schools/communities.
- Mandatory Codes of conduct on GBV prevention will be signed by all contractor workers and managers, and trainings and refreshers will take place on an ongoing basis, including focus on SEA and sexual harassment
- Assess and ensure appropriate living conditions for workers' and ensure appropriate location for their camps a safe distance outside the communities
- The contractor shall provide separate toilet and hygiene facilities functional for men and women working on the site, including inside-locking doors and appropriate lighting
- Liaise with the NPCU/World Bank on providing Third Party Monitors (TPM) for the project with experienced GBV staff to monitor implementation of the SEA/SH Prevention and Response Action Plan and ensure all parties are meeting their responsibilities.

> Details on additional Schools Related GBV/SEA (SRGBV), SEA/SH Action Plan are provided in the GBV Assessment Report for the AGILE Project.

The Supervision Consultant GBV Specialist shall be responsible for daily monitoring of the contractor performance and adherence to the labour influx guideline and that of its Sexual Exploitation and Abuse (SEA) obligations, while the SPIU will conduct periodic monitoring to ensure the project is implemented in accordance with the GBV Action Plan, C-ESMP, and other relevant SEA/SH preventive contractual provisions.

5.5 Impacts Associated with ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

A standalone RAP will be prepared to specifically address impacts relating to ESS5. In addition, Vulnerable Persons Support Program and Livelihoods Support Program will be implemented for vulnerable PAPs identified with regards to impacts on ESS5 as described in table 10 below.

Table 10: Specific Impacts on ESS5

No.	LGA/ School Name	Concern	Ownership	Land Use type & status	Profile of Owner	Remark	Picture
1.	Funtua/ Makwalla Pilot Secondary School	Land Acquisition Affected crops	Individual (R of O) *(Owner indicated voluntary land donation)* *However, due to the World Bank regulations, such a PAP is not eligible for voluntary donation because of age, family size and land area required*	Farming (ongoing) by landowner	• Vulnerable by age (61 years) • Large family size (4 wives, 42 children) • Major Occupation: Farming • Size of affected land: 180 x 315 m	• Prepare RAP for land acquisition • Compensation for affected crops • Vulnerable Persons Support Program (VPSP)	
2.	Funtua/ Government Pilot JSS, Unguwar Inji	Land Acquisition	Individual Inheritance Owner has no other land	Uncultivated farmland	• Vulnerable by age (80 years) • Economic vulnerability (less than minimum wage of N30,000/ month): N10,000/month • Large family size (2 wives, 8 children) • Occupation: Farming • Size of affected land: • 185 x 60m	• Prepare RAP for land acquisition • Provide suitable Livelihood Restoration Plan (LRP) to PAP/family member • Vulnerable People Support Plan (VPSP)	
3.	Kurfi/ Government Pilot JSS, Barkiya *(Kufan Agga Model Primary*	Land Acquisition Affected Economic trees grown by	Individual (R of O)	Uncultivated farmland	• Vulnerable by age and family size: 58 years • Large Family size: 3 wives and 23 children • Major Occupation: Farming • Size of affected land:	• Prepare RAP for land acquisition • Provide suitable VPSP/LRP to PAP/family member	

No.	LGA/ School Name	Concern	Ownership	Land Use type & status	Profile of Owner	Remark	Picture
	School)	landowner			85 x 40 m		
4.	Kurfi/ Government Pilot SSS, Barkiya *(Kufan Agga Model Primary School)*	Land Acquisition Affected Crops	Individual (R of O)	Farming (Ongoing) by landowner	• Vulnerable by age: 60 years • Large Family size: 4 wives and 10 children • Major Occupation: Farming • Size of affected land: • 85 x 40 m	• Prepare RAP for land acquisition • Provide suitable VPSP to PAP/family member • Compensation for affected crops (Prepare RAP)	
5.	Kurfi/ Yar-Unguwa Primary School	Affected Crops (Access restricted to 3m width by farmland)	Crops on ROW of the school land	Farming (Ongoing)	• NA	• Compensation for affected crops (Prepare RAP)	
6.	Matazu/ Rinjin-Idi Primary School *High Insecurity Index (HII)*	Affected crops	School land	Ongoing farming activities by school staff	• School Staff	• Offset by preparing RAP to compensate for crops	

No.	LGA/ School Name	Concern	Ownership	Land Use type & status	Profile of Owner	Remark	Picture
7.	Bakori/ Makurdi A Primary School	Land Acquisition Affected Crops	Individual (Inheritance)	Farming (Ongoing) by landowner	• Vulnerable by age: over 60 years	• Prepare RAP for land acquisition • Provide suitable VPSP to PAP/family member	
8.	Bakori/ Kabomo Community College	Land acquisition Affected Crops	Community land (Voluntary land donation)	Farming (Ongoing) by a community member	• Community Leader	• Compensation for affected crops • Project to ensure adequate documentation of land donation agreement with witnesses from the community	
9.	Daura/ Sukwanawa Primary School	Land Acquisition Affected Crops	Individual (Inheritance)	Farming (Ongoing) by landowner	• Economic vulnerability: N10,000/month • Total available land: 71 x 67 m; Size of Affected land: 67 x 26 m (37% of total land)	• Prepare RAP for land acquisition • Compensation for affected crops • Provide suitable LRP to PAP	

5.6 Addressing Impacts and Mitigation Measures

All risks and impacts identified above i.e. potential negative environmental, social & OHS impacts, GBV/SEA/SH risks amongst others are adequately addressed in chapter 7 of this ESMP with details of mitigation and monitoring responsibilities and costs, while the standalone RAP to be prepared will specifically address impacts relating to ESS5.

Chapter Six– Grievance Redress Mechanism (GRM)

6.1 Introduction

Grievance mechanism is an accessible and inclusive system, process, or procedure that receives and acts on complaints and suggestions in a timely fashion and that facilitates resolution of concerns arising from a project. An effective grievance mechanism (GM) provides project-affected parties with redress and tackles issues at an early stage.

The Project Grievance Mechanism is a free, open, and accessible to all, including disadvantaged and vulnerable groups, grievances will be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available to all stakeholders. The grievance procedure is designed to take into account the needs of vulnerable groups. All complaints will be investigated to establish their validity and to ensure they are treated in a timely and prompt manner. If required, corrective actions will be implemented, documented, and communicated to prevent any recurrence of problems.

The AGILE Project NPCU prepared a comprehensive Grievance Redress Manual which contains details on steps and measures in receiving, addressing and resolving complaints. The manual also includes measures on GBV-GRM protocols including survivor-centred approach and confidentiality. The manual will be used by all project stakeholders, specifically, the SPIU, supervision consultant, school management and students, project communities, Grievance Redress Committees (GRCs), CBMC members amongst others.

Katsina AGILE has domesticated the GRM Manual, key highlights and actions are included in the following sections. (However, a separate GRM for contractor workers have been defined in section 6.9, notwithstanding, workers may choose to use this general project GRM or any other mechanism as they prefer.)

6.1.1 Objectives of the GRM

The Grievance Redress Mechanisms will achieve the following objectives:

- Provide information on project implementation
- Provide clear procedures for resolving grievances and disputes in the school/communities where the sub-projects will be implemented
- Resolve disputes on time and effectively
- Allow school management/staff/students, communities to express views on project activities
- Ensure people use the system and staff understand what is going well or poorly with the program

This GRM will provide the roadmap for stakeholders to discuss and resolve grievances and channel such grievance in an acceptable, independent and institutionalized manner for resolving conflict coming from project activities.

6.1.2 Scope and Applicability of the GRM

The GRM is applicable to all levels of the project execution including the project level (school site/community level), SPIU level, MDAs involved in the project, stakeholders with interest/influence in the project, CBMCs, NPCU level.

With respect to the new construction works, some areas of potential concerns include grievances that may arise from any of the following:

- Construction activities which may cause noise, dust emission, community health and safety issues, waste management issues

- Changes in land use, land donations, land acquisitions or restriction of land use
- Disruption of academic activities and livelihood activities
- Potential increase in sexual exploitation and abuse/sexual harassment (SEA/SH) due to labour influx
- Disagreements and conflicts from community members against the contractors either as a result of illicit behaviour, abuse of culture, competition for resources in the project area, unfair terms of engagement of community workers
- Exclusion of Persons with Disabilities, including children with disabilities
- Impact on graveyard
- Lack of alternative route for movement during construction
- Waste from construction debris dumped along the road or in farms.

6.2 Existing Conflict Resolution Structures within the Project Communities

The outcome of consultations with various stakeholders during the ESMP preparation revealed that most grievances are reported to the ward head, popularly known as Mai Unguwa for redress. In a situation where the ward head is unable to resolve the issue, it is then referred to the village head (Dakachi). Matters that are not resolved at the village head level are transferred to the District head (Hakimi) for his consideration and fatherly advice which mostly settle and resolve the conflict.

However, for cases that are of higher magnitude and could not be settled with the district head, the conflicting parties appeal to the Emir (Sarki) or take the matter directly to court to seek redress. But only few cases are taken to court because most conflicts are resolved with the community or the traditional leaders in the communities.

The current channels for conflict resolution within the communities can be summarized in figure 11 below;

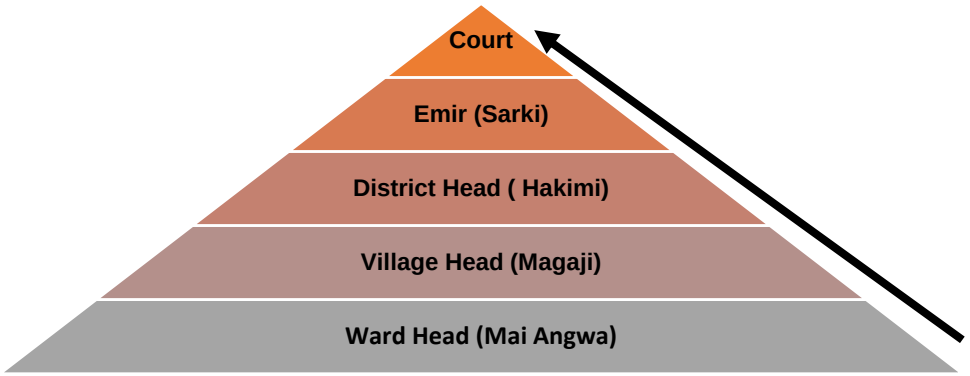


Figure 11: Current Conflict Resolution Channels in the Communities

A major function of this traditional system is the prevention of conflicts and maintenance of social stability and advising the local government. Over the years a synergy has been found and maintained between these traditional systems and the formal justice structures. Naturally, grievance redress issues are mostly passed through the village head to the district head and in extreme cases to the court.

6.3 Existing Conflict Resolution Structures within the schools

It was gathered during the consultations with the schools that most grievances are settled within the school. The students/staff normally report matters that needs management intervention to the principal for redress.

When the conflict cannot be resolved by the principal, it is then referred to the Parent Teachers Associations (PTA) or School Based Management Committee (SBMC) where the cases or conflict are mostly resolved. Where the grievance goes beyond this level, it can be reported to the Katsina State Ministry of Education where further action will be taken including use of police or legal system. This process is summarised in figure 12 below:

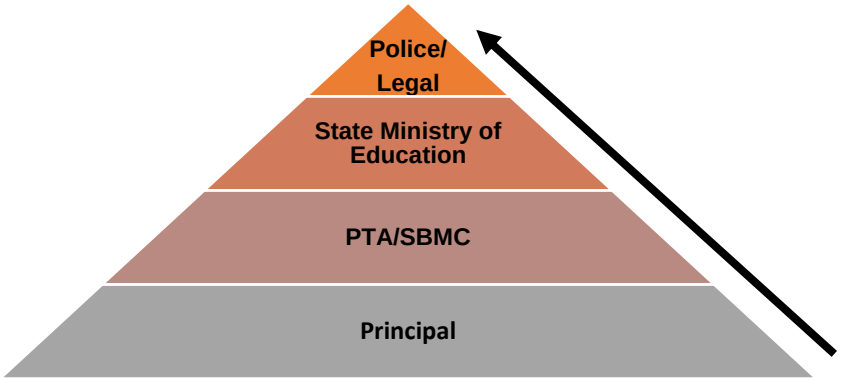


Figure 12: Existing Conflict Resolution Structure in the Schools

6.4 Katsina AGILE Grievance Handling Process

Katsina AGILE SPIU will embed the existing grievance redress channels into the project GRM design to create confidence on the part of stakeholders in using the GRM and also foster sustainability of the GRM during the operation phase and beyond the life cycle of the AGILE project.

This mechanism is developed as a multiple-level design (project site, local government, state, and national) and will address diverse complaints, and involve activities like logging, tracking, resolving grievances and providing feedbacks promptly during and after project implementation. This GRM has also been prepared in a manner that integrates both the formal and informal/traditional approach to grievance redress mechanism and was established around the Community system, the State institutions and the National Project level (NPCU).

This will adopt eight (8) simple steps in the process of grievance handling is shown in Figure 13 below:

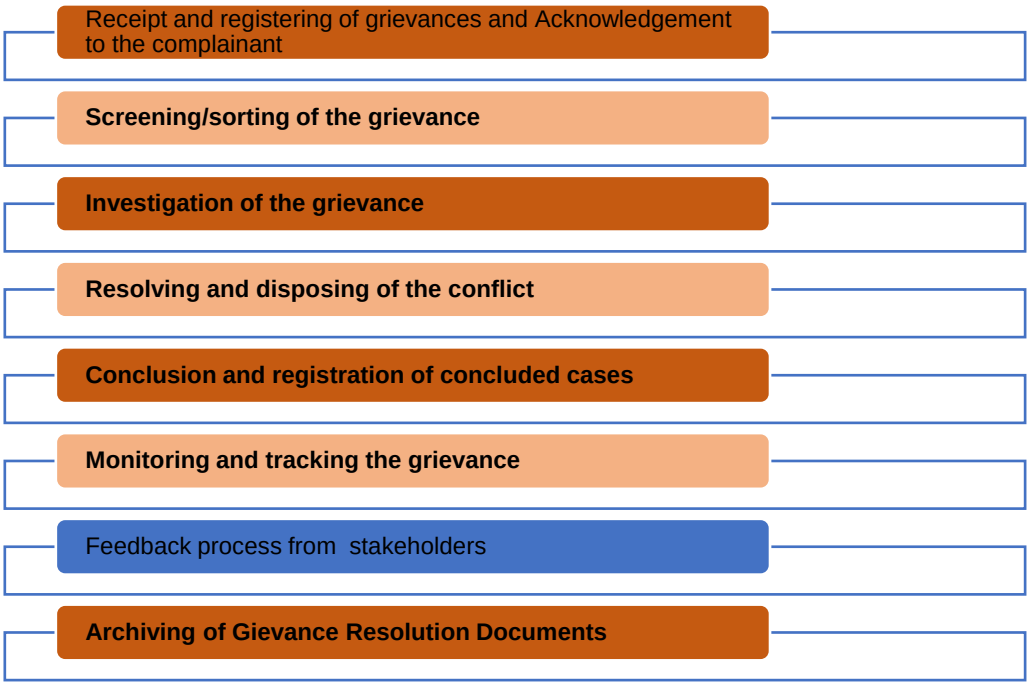


Figure 13: Grievance Handling Process

6.4.1 Channels to Receive Complaints

The Project will utilize various channels provided below to receive complaints/grievances from Project affected persons and stakeholders:

- Grievance Redress Committees (GRCs), which will be formed at the school/community level, SPIUs and NPCU
- Complaint register /Suggestion Boxes located at strategic places in the communities such as within the school compound, community market, community leaders house etc.
- Dedicated Telephone Lines which will be manned by the GR focal persons
- Meetings/consultations/Focus Group Discussions (FGDs)/ Oral reports to school management, CBMC, community leaders, women leader, youth leader etc.

Channel 1: Grievance Redress Committees

- Complaints/suggestions can be received through Grievance Redress Committees (GRCs)
- GRCs will be set up at the project site/community level, the SPIU level and the NPCU level.
- Members of the communities would be sensitized on the GRM use, process and procedure.
- Stakeholders can channel their concerns through any member of the GRC, who will in-turn inform the committee for proper recording and subsequent action

First level GRC – Project Site/Community Level

This GRC is easily accessible to complainants in the project area (school/community people), without any costs.

Members of the 1st level GRC will include:

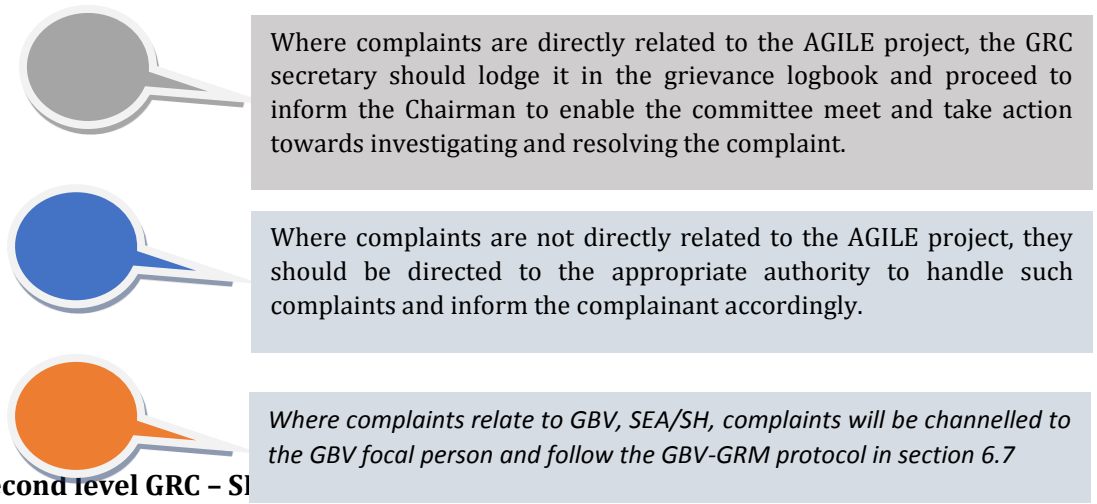
- A Representative of community leadership / Representative from the CBMC - Chairperson
- School Principal
- PTA Chairman of the school
- Guidance Counsellor of the school – Secretary (GR/GBV focal person)
- Women representative (community women/ HILWA/Mothers Association)
- Student representative*
- Representative of the Dispute Resolution Centre in the LGAs*
- LGEA officers responsible for schools monitoring and inspection (from SME and SUBEB)*
- Representative of Supervision Consultant.

With the support of the SPIU Social and GRM Officers, the GRC will sensitise students, staff, community members on how to channel complaints to the committee through any of its members or other available channels such as complaint boxes, phone lines etc.

This committee will be expected to receive complaints through the designated channels (complaints boxes, designated phone numbers, direct complaints lodged with any member, complaints raised at progress review meetings/FGDs/public consultations etc., anonymous complaints amongst others).

**Student representative will be involved when the grievance involves students*

**Representative of the Conflict Resolution Centre in the LGAs and the LGEA officer responsible for schools monitoring and inspection will be involved when the case is complex or where the attention at that level is required*



Second level GRC – Sl

This GRC is formed at the SPIU level and can receive complaints from the 1st level GRC or directly from complainants through phone calls, walk-in at the SPIU office or directly during visit to the communities.

Members of the 2nd level GRC include:

- Project Coordinator – Chairperson
- GRM Officer - Secretary
- Social Development Officer
- Environmental Officer
- Communication Officer
- GBV Officer
- Monitoring & Evaluation Officer

Third level GRC – State Steering Committee Level

This GRC is basically the State Steering Committee responsible for overall project coordination and execution of the project in the state. They can receive complaints from the 2nd level GRC or directly from complainants.

Members of the 3rd level GRC include:

- Commissioner, Ministry of Education – Chairperson
- Project Coordinator – Secretary
- SUBEB
- Ministry of Sci. & Tech
- CBMC/SBMC
- Ministry of Women Affairs
- Ministry of Youths
- Ministry of Health
- Some other members like NGOs are also members which can be called on as required

Fourth level GRC – NPCU Level

This GRC is formed at the National office level and can receive complaints from the state GRCs or directly from complainants. For grievances beyond this level, complainants are allowed to seek legal redressal if they wish to do so.

Members of the 4th level GRC include:

- National Project Coordinator – Chairperson

- GRM Officer - Secretary
- Social Development Officer
- Environmental Officer
- Communication Officer
- GBV Officer
- Monitoring and Evaluation Officer

The flow of the GRC referral is depicted in figure 14 below

Figure 14: Flow of Complaints Processing through the GRC

Channel 2: Complaint/Suggestion Boxes

- Complaints/suggestions can be written by project affected persons, interested parties and other stakeholders and dropped in the complaint boxes in the project area.
- Complaints boxes to be located within the school and in the community – marketplace, near community leader's residence, other public places etc.
- The name of the project and dedicated GRM number will be on the box
- It will have a lock and be on a stand and safe from rain
- The boxes will be accessible to persons in the project area but also provide some form of privacy in case of anonymous complaints

- The designated GRM focal person (usually the secretary of the community level GRC) should retrieve complaints from the box at least every 48hrs.
- Project related complaints should be documented in the grievance logbook for further action, while complaints not directly related to AGILE should be forwarded to the appropriate authority for action and the complainant duly informed of this action.
- Following the record of the complaints, the GRC will schedule a meeting to address the complaints timely
- GRCs to sensitise students, staff and community members on the locations and use of the complaint boxes.

Channel 3: Dedicated Phone Lines

- Dedicated GRM phone numbers will be provided by the SPIU to the GRCs
- The lines will be toll free
- This number will be provided on the project signpost and the complaint box for easy access of stakeholders
- All complaints received on the phone will be recorded in the grievance logbook
- Subsequently, this will be addressed by the GRC
- GRCs to sensitise student, staff and community members on the numbers
- The cost of maintaining the phone lines will be borne by the SPIU

Channel 4: Meetings/consultations/Focus Group Discussions (FGDs)/Oral reports

- Complaints and suggestions could be received during on-site project progress meetings, focal group discussions, community meetings, student meetings, through the SBMC or other forms of oral receipt etc.
- This complaints from such meetings will be channelled to the GRC and documented
- This will also follow the complaints resolution process

6.5 Processing of Complaints

This section explains the step-by-step process that a complaint goes through from receipt to resolution. This covers the following:

- Receiving and Recording Grievances
- Acknowledgement of Grievance
- Verification/Screening
- Allocation of Responsibility

- Grievance Investigation
- Resolution, Closure and Feedback
- Process chart
- Timeframe

6.4.2 Receiving and Recording Grievances

The grievances from the stakeholders or their representatives may be communicated verbally in person or over a telephone conversation to the dedicated GRM line or in written form placed in the complaint boxes or submitted to the project representatives. All grievances communicated in any of these mediums will be recognized and recorded by the GRCs as and when it is expressed.

The registration will capture the following data:

- name of the complainant (for non-GBV related cases),
- date of the grievance,
- category of the grievance,
- persons involved, and
- impacts on complainant life, proofs and witnesses.

Grievance Logbook – all project related grievances will be logged in the grievance logbook.

- The grievance logbook will be maintained by the GRCs at the project site, SPIU and NPCU level
- This will be used to record grievances and how they are resolved
- The SPIU will provide the logbook for the GRC at the project sites
- The logbook will be kept by the GRC secretary/GRM officer at each level
- **A separate GRM log would be available for recording GBV related issues. The log will contain minimum information and be manned by the Guidance Counsellor at the Community level and kept in a confidential manner. See section 6.7 for details**.
- SPIU GRM officer to review the project sites logbooks on a monthly basis to see the type of grievances received and how they were addressed. The officer should maintain an electronic version of the grievance logbooks and upload details of grievances from all project sites in the GRM database.
- NPCU GRM Officer to review the SPIU grievance logbooks on a monthly basis either as scanned copies/emails or during monitoring & supervisory visits and maintain a GRM database for all the states.
- NPCU GRM Officer through the NPC will transmit the quarterly report to the World Bank Task Team Leader.

6.4.3 Acknowledgement of Grievance for Non-GBV Cases

Once the grievance is received and registered by the GRC secretary, a grievance number will be allocated and communicated to the grievant. This communication will also serve as an acknowledgement of the grievance. In case the grievance is assessed to be out of the scope of the GRM, a communication towards the same will be made to the grievant, and an alternative mode of redress will be suggested. As part of this acknowledgement, a tentative timeline for the redress of the grievances will be identified, in keeping with the process below. This acknowledgement will be provided on the same day as the grievance is received.

6.4.4 Verification/Screening

Upon acknowledgement of the grievance, the recipient of the grievance in conjunction with the GRC secretary/ Chairman will quickly screen the compliant to ascertain its merit, relevance, categorization and whether further action is required by the project or not -

- Where complaints are not project related, the GRC should channel this to the appropriate authority for resolution, compliant should be closed and feedback should be given to the complainant on action taken
- In the case of SEA/SH/ GBV complaint, this will not be investigated by the GRC, but rather the case will be referred to the GBV focal person and handled in line with section 6.7, and with the survivor's consent, further action will be taken where the survivor will be referred to the relevant GBV service provider.
- Where the case is criminal in nature such as issues relating to armed robbery, serious bodily harm, manslaughter or murder, it should be immediately reported to the police/ other appropriate authorities

6.4.5 Allocation of Responsibility for Non-GBV Related Cases

- Once the grievance is received and recorded, based on the subject and issue, the Grievance Redress Officer will identify the department, contractor or personnel responsible for resolving the grievance, and also the GRC members that will be relevant to the matter and initiate a timeline for discussion/constitute a GRC meeting.
- Addressing a complaint will be timely, responsive and as less complicated as possible. Where the complaint is an emergency, the matter will be treated urgently, pending when proper investigations and address can be made. Timeline to discuss matters will be commensurate to the complaint

6.4.6 Grievance Investigation (for non-GBV/SEA/SH cases)

The Grievance Redress Committee will discuss and undertake an enquiry into the facts relating to the grievance. This will be aimed at establishing and analysing the cause of the grievance and subsequently identifying suitable mitigation measures for the same. The committee may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand.

The grievance redress committees will be responsible for the following:

- Communicate with the affected persons and evaluate what form of redress they are entitled to
- Investigate the complaint in a fair, honest and open-minded manner

- Interview/discuss with concerned parties with a view to resolving the issue
- Recommend a solution to the grievance
- Communicate the decisions to the complainant
- Refer the grievance to a higher level GRC, if unresolved

The GRC will investigate all project related complaints and resolve/provide responses. Where the issue cannot be resolved at a particular GRC level, the complainant will be supported in escalating the grievance to the next level GRC. However, efforts will be made to resolve all grievances at the project site/community level.

6.4.7 Resolution, Closure and Feedback

Based on the understanding developed from the investigation and consultations, the GRC will identify a suitable resolution to the issue. This resolution will be communicated accordingly to the grievant.

- If at any stage, the grievant is not satisfied with the resolution, she/he may choose to ask for an escalation of the grievance to the next level GRC, this should be facilitated by the GRM focal person. However, where grievance still remains unresolved, complainant will be advised of his/her freedom to seek court redressal if they choose to.
- The status of the grievance will be updated in the grievance logbook frequently by the GRM secretary/officer.
- Once the grievance is resolved, and the same has been communicated to the grievant, the grievance shall be closed in the grievance logbook.
- The grievance register will also provide an understanding of the manner in which the grievance was resolved. These instances shall then serve as references for any future grievances of similar nature
- Where there is evidence of recurring issues or grievance coming up on the project, it is necessary to flag this up to the NPCU in order to assess if the project design requires updating

6.6 Timeframe for Processing Grievances

This section provides information on the expected timeframe for each stage of the GRM. It is expected that every responsible party will ensure they achieve the stipulated timelines or less.

GBV/SEA/SH cases will not follow this timeframe and support must be provided to the survivor immediately due to the serious natures of SEA/SH issues.

Table 11: Time Frame for Processing Complaints

PROCESS	DESCRIPTION	COMPLETION TIME FRAME	RESPONSIBLE AGENCY/PERSON
Receipt of complaint	Document date of receipt, name of complainant, location, nature of complaint etc.	Same day it was received	Secretary to GRC at project level
Acknowledgement of grievance to the complainant	By letter, email, phone	Same day as date of receipt of complaint	Secretary to GRC at project level
Screen and Establish the Merit of the Grievance	Review the complaint/ Listen to the complainant and assess the merit	2 days after receipt of complaint	Project level GRC Secretary & the aggrieved PAP or his/her representative
Refer unrelated project grievances	Where complaint is not related to AGILE refer to appropriate authority and inform complainant	2 days after receipt of complaint	Project level GRC Secretary & the aggrieved PAP or his/her representative
Investigate the grievance	Visit the site, conduct investigations and interviews	1 – 3 days after receipt of complaint	Project level GRC members
Implement a redressal action	Discuss and agree on the grievance resolution	1 – 7 days after receipt of complaint	Project level GRC members & the aggrieved PAP or his/her representative
Escalate to SPIU for a dissatisfied scenario	Refer the complainant to the SPIU GRC	3 – 10 days after investigation	Project level GRC Chairman
Receipt and record of complaint at SPIU GRC	Document date of receipt, name of complainant, location, nature of complaint etc.	Same day of receipt	SPIU GRM Officer
Investigate/ Implement a redressal action	Review the previous action by the project level GRC/ conduct investigations and interviews. Recommend grievance resolution	2 – 7 days after receipt	SPIU GRC
Escalate to State Steering Committee for a dissatisfied scenario	Refer the complainant to the State Steering Committee	3 – 10 days after receipt	State Project Steering Committee Chairperson
Escalate to NPCU for a dissatisfied scenario	Refer the complainant to the NPCU GRC	3 – 10 days after receipt of complaint	State Project Coordinator
Receipt and record of complaint at NPCU GRC	Document date of receipt, name of complainant, location, nature of complaint etc.	Same day after receipt	NPCU GRM Officer
Investigate/ Implement a redressal action	Review the previous action by the GRCs/ conduct investigations and interviews. Recommend grievance resolution	2 – 5 days after receipt	NPCU GRC
Last resort - Advice complainant of option to seek judicial redress	Where resolution is not reached, complainant is free to seek judicial redress. NPCU to document the case including all attempts at resolution and send a report to the TTL	7days after receipt	National Coordinator
Close the case	Follow up to obtain feedback and document resolution in logbook	As required	GRM officers

6.7 GBV GRM Protocol

The GBV GRM will have special procedures for responding to allegations of sexual exploitation and abuse (SEA) and sexual harassment (SH) that are made against a project actor. However, for any complaint that is reported to the GRM (including complaints involving other forms of GBV that are not related to the project), the GRM will also have procedures in place to refer the individual to GBV service providers.

To fulfil the role of addressing GBV, all staff and volunteers at all levels of AGILE Project will be trained (and/or have previous knowledge and experience) on the GBV Guiding Principles and the specialized procedures for receiving and referring GBV-related complaints. This set of skills

will help GRM staff and volunteers to support the quality of the complaint mechanism, while at the same time ensuring the adherence to these Guiding Principles and a survivor-centered approach, including right to safety, respect, and confidentiality, of the complaint intake and management. Hotline operators in particular should receive training on the handling of GBV-related complaints in line with the principles of confidentiality and the specialized procedures.

When receiving a grievance/during the intake process, the person receiving the complaint shall respect the wishes, choices, rights and dignity of the complainant. In order for the survivor/complainant to make informed decisions about whether to seek services and whether to file a complaint with the project (where the complaint involves SEA or SH), she/he needs to be provided with clear and simple information on the functioning of the system, on the possible outcomes, likely timelines, and the types of support that can be provided. The survivor/complainant must also give their consent for the sharing of basic, anonymous, non-identifiable monitoring data about the incident with the SPIU/NPCU and with the World Bank. If a complainant chooses not to be referred to GBV service providers or have the project take further action, then the case will be closed. The officer or volunteer must seek the survivor/complainant's consent to share basic monitoring data, and if no consent is given, no data will be recorded. For GBV cases, it is important to ensure that access to the complaints processes is as easy and as safe as possible for the complainant/survivor and that they clearly understand the referral process.

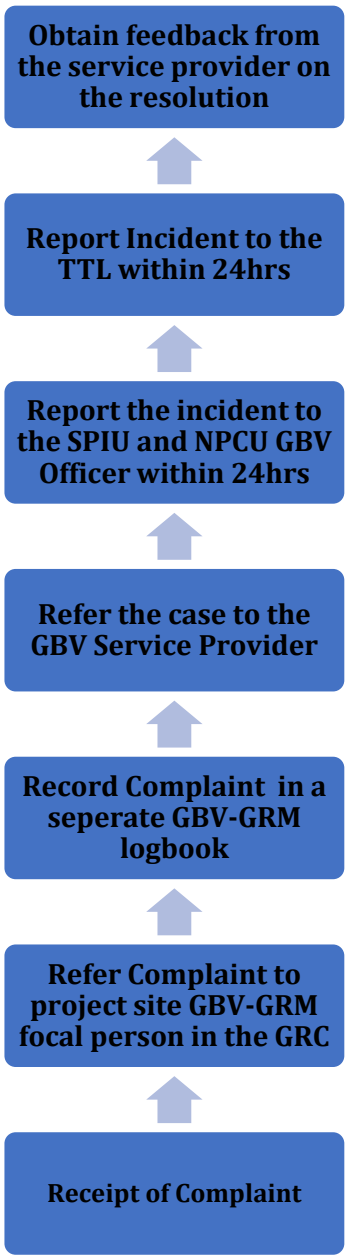
The GBV/SEA/SH Grievance remit is to:

1. provide survivor centred approach
2. provide confidential and accessible channels for reporting cases
3. enable linkages between survivors to the GBV service providers such as legal system, health, security, psycho-social, livelihood, mapped by the project

To mitigate possible project-related SEA/SH grievances, the SPIU will adhere to prevention measures as stipulated in section 5.4 GBV Risk Management Mechanisms above.

The principles for the GBV GRM and channels for receiving GBV related complaints are detailed in the GRM manual. Section 6.7.1 below shows the process for receiving GBV complaints and referral.

6.7.1 Process for Receiving GBV Complaint and Referral



The GBV officer to obtain feedback on resolution of the case from the GBV service provider and record same including strategies to prevent re-occurrence

If the survivor wishes to take police or legal action, information as contained in the referral directory is provided by the GBV Officer

The SPIU GBV Officer to ensure the case is reported to the NPCU and TTL without information of the survivors identity, only about the allegation, age and gender of the survivor, and what action has been taken.

There may be need for the service provider to re-sensitize stakeholders at the project level on SEA/SH/GBV in collaboration with the SPIU and also develop strategies to prevent such re-occurrence.

The GBV-GRM officer to immediately refer the case to the relevant GBV service provider identified in the referral directory

The GBV-GRM Focal Person needs to provide the survivor information on services available and with their consent, move to recording. The GBV-GRM FP will record the nature of the complaint only with no identifiable information on the survivor. Refer the survivor immediately to the project's registered GBV service providers

Complainant should be immediately referred to the GBV-GRM focal person at the School or Community – Guidance Counsellor without asking further questions or details

Keep complainant/survivor information confidential and anonymous

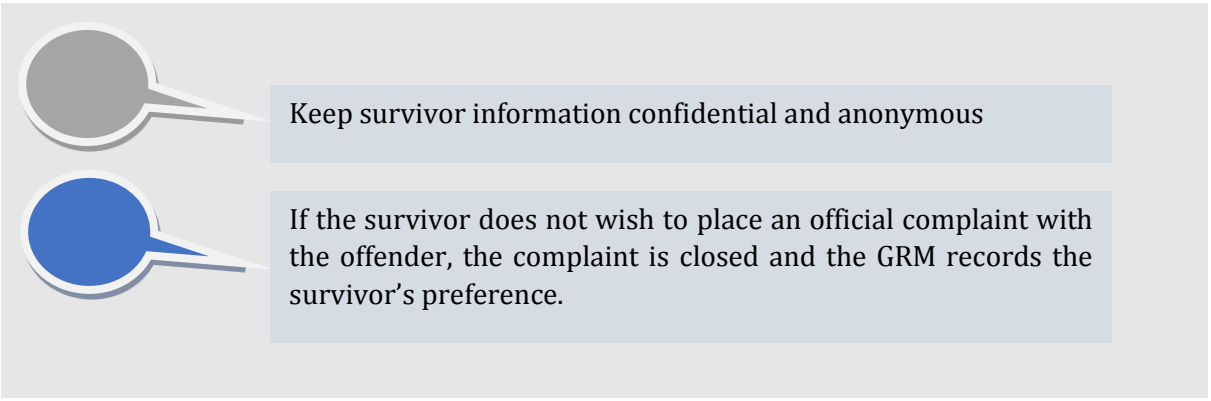
All GRM Focal persons must be trained on the SEA/SH escalation process so that they can refer all SEA/SH survivors to the Service Provides in case the Guidance Counsellor is not available.

6.7.2 Documentation of GBV GRM Cases

Given the highly sensitive nature of the topic, caution would be taken when communicating about reported SEA/SH incidents. GBV-related complaints would provide information only on the nature of the complaint (what the complainant says in her/his own words), and operators would link the complaint to a GBV service provider for necessary attention and action

The GBV-GRM focal persons will be trained by GBV experts hired by the NPCU/SPIU GBV Officers on how to collect GBV/SEA/SH cases confidentially and empathetically (with no judgement)

- In recording the incident, the identity of the survivor should be protected, keeping survivor information confidential and anonymous (no names in the record book). This information is limited to (a) the nature of the allegation or incident; (b) whether the incident is likely to be project related; (c) the age/sex of the survivor (if known); and (d) whether the survivor was referred for services.
- Ensure that no identifiable information on the survivor is stored in the GRM
- Document the exact complaint (no detailed information of the incident is expected), date, action taken and close the report
- As required, refer complaints to the GBV service provider



6.8 Grievance Redress Mechanism for Contractor Workers

In line with the provisions of the World Bank ESS2: Labor and Working Conditions, this section provides a grievance redress procedure for contractor workers which should be made available and accessible to all contractor workers to seek redress for complaints.

The procedure for workers GRM is as follows:

- Who the employee should report to
- Time frame for addressing grievances
- Opportunity to report to a higher-level authority if grievance is not resolved satisfactorily
- Right to seek judicial redress

The grievance process is guided by the following principles:

- Transparency
- Confidentiality
- Non-retribution practices
- Non-vindictive
- Right to representation
- Proper documentation

6.8.1 Grievance Redress committee for Contractor Workers

Four (4) applicable GRC levels have been defined for all workers related complaint as stated in table 12, however, for GBV/SEA/SH related cases this will follow a different channel as stated in section 6.7 above:

Table 12: GRC Levels for Workers GRM

First Level GRC at the project site	This comprises of the Supervising Consultant representative, School Principal, Representative from CBMC. The committee will endeavour to resolve cases at this level, however unresolved cases can be channelled to the second level GRC with the consent of the complainant.
Second Level GRC at the SPIU level	This will be the same GRC constitution for the project GRM: Project Coordinator, GRM Officer, Social Development Officer, Environmental Officer, Communication Officer, GBV Officer and Monitoring & Evaluation Officer. Unresolved cases at this level can be channelled to the third level GRC
Third Level GRC	The state labour office for the Federal Ministry of Labour & Employment at Federal Secretariat, Kano-Kankia-Katsina Road, Katsina State
Fourth Level	Judicial Redress: Complainants also have the right to seek court redress when the previous options have been exhausted without solution

6.8.2 Channels for Receiving Complaints

Workers can lodge their complaints through the following means:

- Complaint boxes – workers can drop complaints in the complaint boxes located at the project site, the community and workers campsite, designated for the project. In which case the Grievance Redress focal officer sorting the complaint will constitute the applicable GRC for workers to address the complaint. The Supervising Consultant representative (the secretary of the GRC) will maintain a workers grievance log book to record grievances, how it was resolved and timelines.
- Direct reports to the GRC members: workers may choose to lodge complaints directly to any member of the GRC at the project site or at the SPIU level.
- Dedicated GRM phone number: the project dedicated GRM lines can also be used by workers to lodge their complaints
- Anonymous complaints can also be lodged

In any instance mentioned above or as may be identified convenient to the worker, the complaint should be considered valid, registered and addressed.

6.8.3 Processing of Workers Complaints

- All complaints received should be registered in a workers GRM logbook by the Secretary, which will contain name of the worker (for non-GBV related cases), date of the grievance, details of grievance, action taken and date, resolution reached and date
- Once the grievance is received and registered by the GRC secretary, a grievance number will be allocated and communicated to the grievant. This communication will also serve as an acknowledgement of the grievance. Addressing a complaint will be timely, responsive and as less complicated as possible. Where the complaint is an emergency, the matter will be treated

urgently, pending when proper investigations and address can be made. Timeline to discuss matters will be commensurate to the complaint

- Complaints that are resolved should be closed, or otherwise referred to a higher level GRC

6.8.4 Time frame for Processing Workers Grievances

Table 13: Time Frame for Processing Workers Grievances

PROCESS	DESCRIPTION	COMPLETION TIME FRAME	RESPONSIBLE AGENCY/PERSON
Receipt of complaint	Document date of receipt, name of complainant, location, nature of complaint etc.	Same day as receipt	Secretary to GRC at project level
Acknowledgement of grievance to the complainant	Directly, or By letter, email, phone	Same day as receipt	Secretary to GRC at project level
Screen and Establish the Merit of the Grievance	Review the complaint/ Listen to the complainant and assess the merit	24 hrs after receipt	Project level GRC Secretary & the aggrieved worker or his/her representative
Investigate the grievance	Visit the site, conduct investigations and interviews	1 – 2 days after receipt	Project level Workers GRC members
Implement a redressal action	Discuss and agree on the grievance resolution	1 – 4 days after receipt	Project level GRC members & the aggrieved worker or his/her representative
Escalate to SPIU for a dissatisfied scenario	Refer the complainant to the SPIU GRC	2 – 5 days after receipt	Project level Workers GRC Chairperson
Receipt and record of complaint at SPIU GRC	Document date of receipt, name of complainant, location, nature of complaint etc.	Same day as receipt	SPIU GRM Officer
Investigate/ Implement a redressal action	Review the previous action by the project level GRC/ conduct investigations and interviews. Recommend grievance resolution	2 – 7 days after receipt	SPIU GRC
Escalate to the state labour office for the Federal Ministry of Labour & Employment for a dissatisfied scenario	Where the worker is still not satisfied, the case can be referred to the next level GRC. The PC should notify the NPCU and the Bank of the case and all actions taken	3 – 10 days after receipt	State Project Coordinator
Last resort - Advice complainant of option to seek judicial redress	Where resolution is not reached, complainant is free to seek judicial redress. NPCU to document the case including all attempts at resolution and send a report to the TTL	7days after receipt	National Coordinator
Close the case	Follow up to obtain feedback and document resolution in logbook	As required	GRM officers

6.8.5 Workers GBV Related Complaints Process

The workers GBV GRM will have special procedures for responding to allegations of GBV/SEA/SH that are made by a worker which will adopt the procedures set out in section 6.7.1: Process for Receiving GBV Complaint and Referral of this report. This involves channelling the complaint to the GBV-GRM focal person at the School or Community (Guidance counsellor), who in turn refers the case to a GBV service provider to address.

6.8.6 Information and Awareness about the Workers GRM Process

During recruitment, induction training, signing of Code of Conduct and site meetings, all workers should be made aware of the grievance redress mechanism available to workers as listed in section 6.8 of this report by the contractor. This should be duly documented and witnessed by the SPIU GRM and Social Officers. Workers should also be made aware of their Right of Association and Collective Bargaining (i. 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 (ii)Workers have a right to organize and collective bargaining, and representation) without victimization or prejudice.

6.8.7 Monitoring of Workers GRM

- The SPIU GRM and social officer should periodically monitor the effectiveness of the workers GRM by conducting adhoc consultations/interviews with workers, reviewing case logs and grievance reports amongst other methods
- At the project site, the Supervision Consultant (SC) should provide a weekly report to the general project GRC on the number and status of workers complaints received. This should also form part of the monthly E&S reporting from the SC to the SPIU.
- THE SPIU will include workers GRM information in the Monthly/quarterly E&S reports, including analysis of the type of complaints, levels of complaints, actions to reduce complaints and initiator of such action.
- Periodic monitoring of timely, mandatory, and confidential reporting in case of incidents to the project level GBV-GRM

6.9 Monitoring of the GRM

The GRM Officer will be responsible for:

- Providing the grievance Committee with a weekly report detailing the number and status of complaints any outstanding issues to be addressed
- Monthly/quarterly reports, including analysis of the type of complaints, levels of complaints, actions to reduce complaints and initiator of such action.
- Periodic monitoring of timely, mandatory, and confidential reporting in case of incidents to the project level GBV-GRM

Chapter 7 – Environmental & Social Management and Monitoring Plan

7.1 Introduction

As part of this ESMP, a project specific E&S management and monitoring plan has been designed to identify potential impacts and outline mitigation measures with well-defined desired outcomes and actions to address all potential negative impacts. The plan also includes elements such as parameters to be measured, methods of measurement, location of measurement, performance indicators (targets or acceptance criteria) that can be tracked over defined time periods, cost estimates and responsibilities for monitoring.

7.2 Institutional Responsibilities for ESMP Implementation

The successful implementation of the ESMP will depend on the commitment and capacity of the Katsina SPIU, E&S unit, technical consultants, NPCU and other third parties/institutions to implement the program effectively. The specific roles and responsibilities of those that will be involved in the implementation and monitoring of this ESMP are highlighted in table 14 below.

Table 14: Institutional Roles and Responsibilities for ESMP Implementation

S/No	Category	Responsibilities
1	E&S Team SPIU (Environmental, social, GRM, Gender Officers)	Assists the SPIU to comply with and fully implement World Bank ESF and other relevant laws in Nigeria. Ensure adequate review of all safeguard reports before sending to the NPCU. Supervision of the contractors, supervisors, training of contractors and workers, monitoring of the implementation of the ESMP, CESMP and other safeguard instruments. Review of ESMP performance and implementation of correction actions if any. Specifically; **Environmental Officer** Analyse potential environmental risks and impacts. Ensure that project activities are implemented in accordance to best practices and guidelines Identify and liaise with all stakeholders involved in environment related issues in the project; and be responsible for the overall monitoring of mitigation measures and the impacts of the project during implementation. Ensure that the project design and specifications adequately reflect the recommendations of the ESMP **Social Officer** Develop, coordinate and ensures the implementation of the social aspects of the proposed project. Identify and liaise with all stakeholders involved in social related issues during the proposed road rehabilitation. Ensure that project activities that are implemented will be in accordance with best practices and guidelines itemized in the ESMP. **GRM Officer** Ensure the development and operationalisation of Grievance Redress Mechanism Ensure project beneficiaries and host communities are sensitised about the available reporting channels and how to access them Periodically monitor the GRM to ensure it is effective and fit for purpose Ensure periodic reporting on project grievances to the NPCU/World Bank **Gender/GBV Officer** Plan and implement all GBV related activities for the project Development of GBV Grievance Redress Mechanism Support the SPIU, in the identification, mitigation and management of the sexual exploitation and abuse (SEA), child abuse, and other forms of GBV related risks identified in the projects.

S/No	Category	Responsibilities
		Ensure that all measures outlined in the GBV Action Plans are implemented for all SPIU programmes. Monitor to ensure service providers are effective **Technical Assistants (TAs), Environment & Social and GBV** Provide technical assistance, guidance and support in implementation of E&S mitigation measures and GBV prevention & response plans
2	AGILE SPIU	Overall responsibility for the implementation and monitoring of the implementation of the ESMP. Monitoring of project/contractor performance and taking appropriate action to ensure ESMP provisions are met. Inclusion of relevant provisions in the bidding document for contractors. Liaise with other relevant State Government MDAs such as Katsina State Ministry of Education, Women Affairs, Ministry of Resource Development, Katsina State Environmental Protection Agency (KTSEPA), Community-Based Management Committees (CBMC), FRSC, Federal Government MDAs such as Federal Ministry of Education, Federal Ministry of Environment, Project LGAs, Host/Affected Communities, Community Based Organisations (CBOs) and Non-Governmental Organisations (NGOs) for effective implementation of the ESMP
3	E&S Unit NPCU	• Support the state to ensure compliance with World Bank ESF and other relevant laws in Nigeria • Oversight functions of E&S coordination and reviewing E&S reports prior to sending to the World Bank • Ensure the state sends in monthly and quarterly E&S compliance report and collate for the attention of the World Bank • Conduct periodic monitoring and supervisory visits to the sites • Support the states in articulating corrective E&S action plans
4	Community Based Management Committee (CBMC)	The Chairman and the secretary of the committee with its members will supervise the implementation of the project during the operation phase Other tasks include: Provide comments, advice and/or complaints on issues of nonconformity. Attend public meetings organized by the SPIU to disseminate information and receive feedback Provide reports on the progress of the project activities
5	Contractor	• Compliance to BOQ specification in procurement including the provisions in the ESMP • Prepare and implement C-ESMP in line with the project ESMP • Ensure all contractor management and workers sign the Code of Conduct (CoC) and are routinely trained on the contents of the CoC • Prepare C-ESMP for approval of ESSU-SPIU • Implement C-ESMP during project implementation • Ensure that all construction personnel and subcontractors are trained on the content of the CESMP and are made aware of the required measures for environmental and social compliance and performance • Provide adequate basic amenities and PPEs to workers and ensure that the PPEs are worn by workers during work. • Prepare and maintain records and all required reporting data as stipulated by the ESMP, for submission to the Supervising Consultant
6	Supervising Engineer Team	• Preparation of the engineering designs for the project and update of design based on the ESMP recommendations • Provides an independent oversight to ensure contractors adhere strictly to the engineering specifications • Ensure contractors prepare their C-ESMPs • Ensure compliance with signing of code of conduct for all workers • Prepare and implement Environmental Monitoring Plan during construction

S/No	Category	Responsibilities
		• Supervise contractor performance of implementation of the ESMP/C-ESMP • Serve as part of the GRM to ensure timely receipt and resolution of complaints against the project • Report any incidents or non-compliance with the C-ESMP and other plans including the GBV Action Plan to the SPIU • Prepare monthly E&S report including recommendations to the SPIU regarding ESMP performance as part of an overall commitment to continuous improvement
7	Katsina State Ministry of Education	• Overall responsibility for project planning and implementation • Provide oversight function and support to the SPIU • Provide counterpart funding to support the project and project staff • Coordinates state-wide awareness on the operation of the new constructed facilities. • Support the Project in the operation and maintenance of the new facilities.
8	Katsina State Ministry of Resource Development	• Support the disclosure of the ESMP at the state ministry of environment • Environmental monitoring and compliance overseer at the State level • Site assessment and monitoring of ESMP implementation
9	Katsina State Environmental Protection Agency (KSEPA)	• Liaise with contractors to support the collection/evacuation of waste from the project sites • Ensure management of project waste in line with best environmental practices as not to degrade or pollute the environment. • Conduct periodic monitoring of environmental parameters to ensure compliance with environmental regulations
10	Federal Road Safety Corps (FRSC)	• Control and manage traffic and road safety throughout project implementation • Discourage counter road safety practices among road users • Support the contractors in training their drivers
11	State Government MDAs	• Other MDAs come in as and when relevant areas or resources under their jurisdiction are likely to be affected by projects. • Participate in the EA processes and project decision-making that helps prevent or minimize impacts and to mitigate them. • MDAs may also be required to issue a consent/approval for an aspect of a project; allow an area to be included; or allow impact to a certain extent or impose restrictions/conditions, monitoring responsibility or supervisory oversight.
12	Federal Ministry of Environment	• Review of Draft ESMP report, provide disclosure letter, receive comments from stakeholders. • Disclose the ESMP in the FMEnv corporate site
13	34 LGAs for Construction Works	• Provision of oversight function across project within its jurisdiction for ESMP compliance. • Monitoring of activities related to public health, sanitation, waste management amongst others.
14	Host/Affected Communities.	• Promote environmental and social awareness including GBV prevention measures • Review environmental and social performance report made available by SPIU. • Provide comments, advice and/or complaints on issues of nonconformity. • Attend public meetings organized by the SPIU to disseminate information and receive feedback.
15	Non-Governmental Organisations (NGOs)/Civil Society	• Assisting in their respective ways to ensure effective response actions, conducting scientific researches alongside government groups to evolve and devise sustainable environmental strategies/techniques.

S/No	Category	Responsibilities
	Organisations (CSOs)	
16	World Bank	Overall supervision and provision of technical support and guidance. • Recommend additional measures for strengthening management framework and implementation performance;

The Katsina AGILE SPIU will have principal responsibility for all measures outlined in this ESMP but will delegate certain responsibilities to its contractors and supervising consultant. Such delegation of responsibility shall be documented as part of contractual agreements to guarantee compliance and commitment on the part of the supervising consultant to supervise and on the part of the contractors to implement the ESMP.

As most of the mitigation measures are the obligations of the Contractor during project implementation, the contractor shall prepare the Contractor's ESMP (C-ESMP) taking into account the measures in this ESMP and the detailed general environmental management conditions during civil works included as Annex 4. The estimated costs of mitigation measures associated with the civil work activities as stated in table 17 will be included in the project's Bill of Quantities (BoQ). The contractor is responsible to implement the proposed mitigation measures as per the instruction of the SPIU. The SPIU is obligated to ensure relevant documents are provided to the contractors including this ESMP, the GBV Action Plan amongst others

7.3 Capacity Building Plan

Based on the assessment of the capacity of the E&S officers of the SPIU, the key actors possess the basic technical capacity required to implement and supervise this project. Nevertheless, for effective implementation of the ESMP, however, the SPIU will undergo specific trainings on ESMP implementation, GRM, GBV in order to enhance its capacity in Environmental and Social Assessment, Implementation and Monitoring. Training is essential for ensuring that the ESMP provisions are implemented efficiently and effectively. The SPIU shall therefore ensure that all persons that have roles to play in the implementation of the ESMP are competent with appropriate education, skills, training or experience.

Similarly, the Contractors and their workers shall be required to undertake training for their project workforce and specific training for those whose work may significantly have adverse impact on the project. This is to ensure that they are fully aware of the relevant aspects of the ESMP and are able to fulfil their roles and functions. As a minimum, the contractors shall ensure they provide the following training to their personnel:

- General Awareness in Occupational Health and Safety (OHS) Training; OHS/HSE Induction/Orientation Course for all workers to include (site safety rules, PPE requirements, Emergency Preparedness and Response); Daily toolbox talks for workers at the start of each day's job; Refresher OHS Courses as at when required.
- Project Specific Occupational Health and Safety (OHS) Training: Material Handling Techniques; First Aid Training (for Site First Aiders); Safe Driving Techniques (for drivers)
- Sensitisation of contractor workers on Code of Conduct for prevention of SEA/SH/GBV, illicit behaviours, crime etc,
- Training on the requirements in the ESMP including impacts avoidance measures, impacts mitigation measures, GBV mitigation, labour management and GRM procedures

The Contractor will be required to forward internal OHS training and procedures to the E&S Team of the SPIU for approval before commencement of civil works.

Based on the assessment of the institutional capacities of the different agencies that will be involved in the implementation of the ESMP, the following areas of capacity building have been identified and recommended. The proposed training program, course content and estimated costs for the proposed project are shown in Table 15 below.

Table 15: Capacity Building Content

S/No	Training Modules	Participants	Duration	When	Who to Conduct Training	Cost (N)
1.	ESHS Guidelines, ESMP mitigation measures and procedures for implementation and monitoring Management GRM Implementation Non-discrimination of Persons with Disabilities	PC, Environmental, Social, Gender, GRM officers, Procurement	2 days	During project preparatory stage	SPIU/ Technical Consultant	N800,000 ($1923)
2	GBV Action Plan, Referral pathways, Mitigating GBV risks in line with the WB-GPN	PC, Environmental, Social, Gender, GRM officers, supervising consultants	2 days	During project preparatory stage Refresher courses annually	GBV Experts/ World Bank	N800,000 ($1923) N500,000 ($1201.9) (annually for 2 years)
3.	Construction HSE Overview of Health and Safety Hazards in Construction Incidents: Causation, Investigation & Reporting Site Specific OHS Construction Site Inspection Personal Protective Equipment	Contractors and their workers	10 days (workers from 150 sites to be batched)	During project preparatory stage Monthly refresher courses to be organised by contractor	Certified OHS Consultant Contractor/ Supervision Consultant	N800,000 ($1923) Captured in the ESMP Matrix table
4.	Training on Code of Conduct, Labour influx, OHS, C-ESMP, GRM, GBV-GRM, stakeholder engagement	Contractors and their workers	10 days (workers from 150 sites to be batched)	During project preparatory stage Monthly refresher courses to be organised by contractor	Technical Consultant Contractor/ Supervision Consultant	) Captured in the ESMP Matrix table
5.	Training of Contractor Drivers, provision of required FRSC standards, Use of substance prohibition etc.	Contractor drivers, HSE officers	2 days	1 day during pre-construction. 1 day during construction phase	FRSC	($6)) Captured in the ESMP Matrix table
6.	Training of GRCs on GRM	Project level GRCs,	Over a one-	During pre-	Technical	N2,300,000

S/No	Training Modules	Participants	Duration	When	Who to Conduct Training	Cost (N)
	procedures across 150 schools (including demonstration materials) Training on non-discrimination of Persons with Disabilities (*training to be stepped down to students by the school management*)	CBMCs, School Management	month period	construction phase	Consultant	($5528.8) Captured in the ESMP Matrix table
7.	Awareness campaign on preventing STDs/ GBV/SEA/SH and reporting mechanisms	Project Communities	Over a one-month period	Once during pre-construction. Once annually during construction phase	Technical Consultant	To be captured in the stand-alone GBV Action Plan for the project
8.	Training on E&S Compliance & monitoring, GRM, SEA/SH/GBV prevention and response mechanism for the project	CBMCs	5 days for all CBMCs across the 150 schools	Upon Inauguration	SPIU/ Technical consultant	N2,000,000 ($4807.69)
Total						**N4,300,000 ($10,336.54)**

* In addition to the trainings, the SPIU E&S officers will be supported by time-based technical assistants on social and GBV.
* Conversion rate of N 416: CBN official Rate 10/09/2022

7.4 Communication Plan

The ESMP will be communicated to all those responsible for mitigation and monitoring as follows:

i. SPIU – the SPIU are part of the ESMP preparation, and discussions were ongoing during the process. The ESMP consultant will conduct a training on the ESMP for the SPIU staff once the document is cleared by the Bank. This will be to enlighten them on the various roles and monitoring requirements in the ESMP implementation.
ii. Contractors – the SPIU will provide the contractors with the ESMP, in addition, mitigation measures and costs will be embedded in the contractors BOQ. The SPIU will also organise an E&S training for the contractors prior to mobilisation to site, which has been included and costed in the ESMP capacity building plan in section 7.3 above.
iii. Supervising Consultants, CBMC, project consultants, Technical Assistants etc. – The SPIU will provide the Supervising Consultants and CBMC members with the cleared ESMP to enable them to understand their role in monitoring compliance of the contractors. They are also part of the capacity building plan in this report. This also applies to any consultant engaged by the SPIU, especially where they are linked to E&S management.
iv. Relevant MDAs and Institutions – as listed in section 7.2 under institutional responsibilities for implementing the ESMP, will be provided with the ESMP at

disclosure. In addition, they will be part of the sensitisation to be provided by the ESMP consultant for the SPIU and relevant institutions when the ESMP is cleared

v. All relevant stakeholders – the disclosure of the ESMP will serve as a platform to communicate the contents of the ESMP to project stakeholders in line with the disclosure schedule in section 7.5 below.

7.5 ESMP Disclosure

After the ESMP review and clearance by the World Bank, the ESMP shall be disclosed in line with the Nigerian EIA laws for 21 days. This will include a formal registration of the ESMP with the FMEnv and receipt of guidelines for the disclosure from them. The Environmental Officer at the NPCU is required to coordinate the disclosure process. At a minimum, this will include the following:

Table 16: ESMP Disclosure

S/No	Action	Remarks	Cost
1.	Registration of the ESMP at the FMEnv	This will be coordinated by the ESO, NPCU	₦ 50,000.00 ($120.19)
2.	Disclosure on 2 national newspapers	This entails advert in 2 newspapers: one national and one local (state) newspaper	₦ 400,000
3.	Disclosure at Katsina State Ministry of Resource Development/ KSEPA/ 34 Project LGAs	The SPIU will disclose the ESMP as required by the Nigeria EIA public notice and review procedures	₦ 100,000 ($240.38)
	Disclosure at the Katsina State Ministry of Education	The SPIU will display the ESMP as required by the Nigeria EIA public notice and review procedures	N/A
4.	Radio announcement of the ESMP at the state	The SPIU will conduct radio announcement that has state coverage for the ESMP, to air for 5 working days and 2 slots per day	₦ 500,000 ($1201.9)
5.	Disclosure at Katsina State AGILE Office	The purpose will be to inform stakeholders about the project activities; environmental and social impacts anticipated and proposed environmental and social mitigation measures.	N/A
6.	Disclosure at the World Bank External Website	The ESMP will be disclosed according to the World Bank Disclosure ESS 10	N/A
7.	Monitoring of disclosure process	The FMEnv will select staff to visit the state and monitor the disclosure process	₦ 500,000 ($1201.9)
		Total	**₦ 1,150,000 ($2764.4)**

*actual costs will be provided at the point of disclosure. The NPCU Environmental Officer will assist the project in the disclosure process. 1USD= N416: CBN Rate 10/09/2022

7.6 Environmental and Social Management & Monitoring Plan

Table 17: Environmental and Social Management and Monitoring Plan

Preconstruction Phase

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
A. Environmental & OHS Impacts												
1A	Movement of materials, vehicles, and equipment to site	Dust generation from untarred road; exhaust fumes of vehicles, equipment Worsen road condition Destruction to trees	Wet earth roads to reduce dust Ensure that all vehicles are serviced; undergo vehicle emission testing (VET) and vehicle exhaust screening (VES). Use road worthy vehicles/ maintain regularly Mark out access route within the school premises to avoid trees	Contractor	N500,000 ($1201.9)	SO_2, NO_X, CO, VOC, $PM_{2.5}$, PM_{10} Type of vehicles/sites Access route marked out	In-situ measurement Site inspection	Air Quality Parameters are within permissible limits as documented by NESREA11 Evidence of VET and VES Evidence of compliance	Project area and within 1km Project area	Bi-monthly Weekly Before movement of vehicles	SPIU E&S Supervision Consultant FRSC Katisna Env. Protection Agency	N500,000 ($1201.9) (represents monitoring costs for the preconstruction phase)

11 National Environmental (Air Quality Control) Regulations, 2014

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
2A	Land and site clearing, staging area and workers camp	Removal of vegetation and shrubs, loss of crops and livelihood in some sites Vegetal Waste Can pollute the environment	Limit land clearing to specific zone needed for the construction work. Protect all vegetation not required to be removed against damage. Replant or revegetate trees/shrubs Liaise with KTSEPA or licenced private waste collector	Contractor	N150,000 ($360.57)	Amounts of vegetation cleared Vegetal Waste on site	Site inspection No of complaints from school or community	Contractor compliance Presence of revegetation Evidence of waste manifest	Project site and area	Before and during land clearing	SPIU E&S, Supervision Consultant Katsina State Env. Protection Agency (KSEPA)	
3A	Creation of Staging area for equipment	Temporary removal of topsoil, Oil leakages from stacked equipment and dis-colouration of topsoil	Segment a safe and specific area for equipment parking Service equipment and install a non-permeable membrane/ drip pans	Contractor	N250,000 ($600.96)	Soil Quality	Visual observation	Soil Quality parameters are within FMEnv permissible limits	Equipment Staging Area	Bi-monthly	SPIU E&S, KSEPA	
		Minimal noise impacts	Retrofit vehicle exhausts with sound-control or sound -proofing devices Maximise activities during weekends, holidays	Contractor	N500,000 (1201.9)	No of Complaints from affected schools and communities No of retrofitted vehicles;	Noise measurement	Evidence of Compliance	Project Area	Weekly	SPIU E&S, KTSEPA	

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
4A	Mobilisation to site and clearing activities	Risk of accidents and injuries to contractor workers Respiratory diseases to Workers due to inhalation of exhaust fumes and dusts Noise Pollution	Submit company HSE Manual/ Implement site specific Occupational Health and Safety Management Plan (OHSMP) see annex 6 for sample The OHSMP will entail: - Provision of Hazard Communication Procedures (HAZCOM); Job Hazard Analysis (JHA); OHS Training program Provision of adequate first aid, first aiders, PPE, safety signages (Hausa and English languages). Ensure qualified HSE officer on every team Workers should get a daily induction/toolbox before work commences Use reflective tapes and signage integrated in all worksites for safety at night Appropriate security measures in place to prevent harassment or kidnapping of workers	Contractor	N800,000 ($1923) Part of Contractor Security costs	Compliance with OHSMP No of workers Trained on HSE/OHS No of accidents, incidents or injuries Noise level Availability and use of appropriate PPEs First Aid Kits Security Management Plan	Site inspection Consultation	HSE/OHS Training reports and list of attendees Evidence of Compliance to OHSMP Evidence of use of PPES, caution signs onsite, well-stocked first aid kits Compliance with Security Management Plan	Project area	Weekly	SPIU E&S Team, Supervision Consultant	
	Sub-Total				**N2,200,000** **($5288.46)**							**N500,000** **($1201.9)**
	B. Social Impacts											

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
1B	Movement of materials and equipment to staging area	Obstruction to access route for students, school staff and community members	Contractor to have a traffic management plan [TMP] in conjunction with the State Traffic Control Agency (see annex 7 for sample)	Contractor		Marked out alternative access route	Site inspection	No of complaints	Project Area	Weekly	SPIU E&S Team	N500,000 ($1201.9)
		Increase in noise levels which will disturb communities, schools, religious activities	Harness alternative access route in Yar-Unguwa Primary School, Kurfi LGA to avoid farmland							Monthly	GRC	N150,000 ($360.57)
		Grievances from restriction of access to farms/ encroachment into farms during movement of equipment and vehicles	Ensure contractors employ locals;			No of locals recruited		Contractor's compliance				(GRM monitoring Cost)
			Provide adequate sensitization; and harness community skills during recruitment process	CBMC		GRCs established, compliant boxes on site					Supervision Consultant	
		Grievance from poor recruitment of local labour for semi- & unskilled labour by contractor	Establish effective GRM for receiving and resolution of complaints			RAP Report	Recruitment records	Documentation from consultations				
			Prepare RAP for compensation of affected farms/crops									

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
				SPIU SPIU	N1,000,000 ($2403.85) Part of RAP cost		Consultation with Project Affected Persons (PAPs)	Implementation of GRM Evidence of RAP Implementation prior to mobilization				
2B	Land and site clearing, staging area and workers camp	Loss of livelihoods and crops Loss of lands to those whose lands will be acquired Grievances from poor or untimely compensation Vulnerable groups could be further disadvantaged due to loss of and and crops	Allow for crops to be harvested before construction commences where possible Sensitize PAPs on their rights and preparation of RAP Prepare RAP	SPIU	- Part of RAP Costs	RAP Report GRM logbook	Consultation with PAPs	Evidence of RAP Implementation Number of compensated PAPs No of Grievances/ complaints	Affected Land area	Before construction	SPIU E&S Team	Part of RAP Monitoring Costs
3B	Labor Influx - Presence of foreign workers and Followers	Potential for SEA/SH/GBV Presence of sex	Sourcing of local workforce from project communities All contractors' workers to be sensitized and sign Code of Conduct (CoC) (see annex	Contractor	-	Number of trained Personnel Code of Conducts	Attendance list / training report	Compliance to SEA/SH Action Plan	Project Area	Bi-weekly	SPIU Gender/GBV Officer	N500,000 ($1201.9) For monitoring of activities on

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
		workers Potential for spread of STDs, sexual relations with community members, female students and staff Abuse of minors	8 for sample CoC) and zero tolerance for sexual integration with students, staff, community SPIU to establish a GRM equipped to handle GBV cases with reporting channels that are easily accessible and community members feels safe reporting to Map GBV service providers in the project area and develop a referral pathway to enable survivors access to quality care SPIU to sensitise school staff, Community leaders, women group, youth group on SEA/SH preventive measures and response plan Signages against tolerance for SEA/SH/GBV to be installed along the project communities/corridor in English and Hausa language Use of minors (below 18) will be prohibited as stated in the CoC Ensure separate and labelled toilets for male and females workers with locks, and to be well lit at night	Contractor in conjunction with the SPIU GBV Officer, GBV Experts/ Service Providers SPIU GRM/GBV Officer SPIU	N2,000,000 ($4807.69) N500,000 ($1201.9) Already completed	GBV-GRM Mapping Report Attendance List/ Training reports Signages onsite Reports/ complaints Designated toilets	Observation/ review of CoCs Consultations with PAPs/ List of GBV focal persons Review List of Service Providers Review training report/ attendance	Signed Code of Conducts Available GBV-GRM MOU Signed between the SPIU and the Service Providers	SPIU Office		Supervision Consultant GBV Officer NPCU Gender Officer	SEA.SH/GBV/Code of Conducts

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
							list	Sensitization conducted				
				SPIU GBV Officer, GBV Experts/ Service Providers					Project Area			
					N500,000 ($1201.9)		Observation	Evidence of signages onsite/ project communities				
				Contractor								
					N300,000 ($721)		Observation	Absence of minors as workforce				
				Contractor				Separate toilets available for male and female				
				Contractor								

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
		Abuse of cultural norms	Educate workers on the cultural norms	CBMC/SPIU	-	Sensitisation conducted	Minutes of sensitisation meeting as part of community entry meetings	Evidence of compliance Number of Complaints	Project Area	Prior to construction phase/ Weekly	SPIU E&S Team Supervision Consultant	Covered as part of 3B costs
4B	Labor Influx and influx of "Followers"12	Risk of social conflicts between the local community and the construction workers/ followers, which may be related to religious, cultural or ethnic differences, or based on competition for local resources	Provision of information regarding Worker Code of Conduct in English and local language(s), Provision of cultural sensitization training for workers regarding engagement with local community. Consultations with and involvement of local communities. Contractors to provide resources for workers including water, electricity, health, toilet see campsite management plan in annex 9 and LMP in annex 10	Contractor GRCs	- Part of costs for establishing campsites	Reports/ Complaints Campsite management/ workers welfare	Review grievance logbook, interviews/ consultations Observation, workers GRM/ Complaints	Absence of complaints Compliance with campsite management plan and labor management plan	Project Area Campsite/ staging area	Weekly	SPIU E&S Team Supervision Consultant GRC	Covered as part of 3B costs N500,000 ($1201.9) Monitoring of campsites/ workers welfare/workers GRM
5B	Movement of vehicles and operationalisation of equipment	Community health & safety risks such as accidents especially for school students and community	Implement community health and safety plan (CASHES in annex 9) and all contractor drivers must adhere to traffic	Contractor	N500,000 ($1201.9)	Training Records Implementation of CASHES and TMP	Review of training records	Drivers trained by FRSC on road safety and fleet management Installed caution and	Project site/ Communities	Weekly	SPIU E&S Team Supervision	Covered as part of 1B monitoring costs

12 ("Camp Followers") such as traders, suppliers and other service providers (including sex workers)

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
		members	management plan (TMP)and road safety rules. see annex 7 for sample: Avoid night hours for fleet movement, use trained drivers, ensure drivers do not use substances, comply with fleet management standards, vehicles should not be overloaded with materials, use of flagmen and safety cautions in built up areas, avoid movement in market areas on market days, limit movement during religious activities etc.	Contractor to liaise with FRSC	N500,000 (($1201.9) (drivers training)	No of Complaints	Review of compliance to TMP and CASHES Accident/ incident reports Grievance records	safety signs in strategic places Absence of traffic incidents Absence of complaints from community persons/ schools			Consultant FRSC	
6B	Establishment of Campsite/staging area/ borrow pit	Transactional issues and grievances for borrow pits, campsite, staging areas. Misuse of property	Fair compensation for renting of staging areas/ campsites Signing of agreement with local authorities and communities with all terms and conditions documented	Contractor	Part of Camp costs in BOQ	No of complaints received Transactional agreements for campsites/staging areas	Review of GRM Logbook, interviews/ consultations Review of transactional agreements	Evidence of adequately signed transactional agreements No of cases resolved by the GRC	Project area of influence	During Preconstruction Monthly	SPIU E&S Team, SPIU Engineer Supervision Consultant CBMC	Covered as part of 1B monitoring costs
7B	All Pre-construction Activities	Security Risks: project workers including NPCU, SPIU, Consultants, contractor workers could fall victim of kidnap, banditry, insurgency, social conflicts etc	Construction areas to be lighted up with flood lights as a way of security for equipment/materials and movement of people in and around the vicinity. Implement security strategies as stated in section 4.5.7 .in addition the project security adviser to prepare and implement	SPIU	Part of SPIU SMP Costs	Security Management Plan Incidents	Security/ incident reports	Compliance to SMP Absence of incidents	Across the State/ Project areas	Continuous	SPIU SPC Police/Army Ministry of Education	Part of SPIU Security costs

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cos	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs
			Security Management Plan (SMP) in liaison with the State Government/Police/ NSCDC/Army Inaccessible sites due to security adopt a security strategy or the areas avoided	Contractor	Part of Contractor SMP Costs							
	Sub-Total				**N5,300,000** **($12,740)**							**N1,150,000** **($2764.4)**
	Total Preconstruction Phase				**N7,500,000** **($18,028.8)**							**N1,650,000** **($3966.3)**

Construction Phase

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
	A. Environmental & OHS Impacts											
1C	Movement of vehicles Civil works at the classrooms, Labs, administrative block, hostels etc.	Increase in particulate matter, vehicular emissions and fugitive dusts from untarred routes could cause air pollution and eye/respiratory diseases for contractor workers	Ensure watering where applicable prior to and during civil works to reduce the release of dusts Use road worthy vehicles and conduct routine maintenance Eye protectors, nose masks to be worn by workers	Contractor	N2,000,000 ($4807.69) (addition for watering and vehicle maintenance)	Air Quality Vehicle quality PPEs availability	Site inspection / observation Vehicle inspection and maintenance reports Use of PPEs	Compliance with air quality standards (see 1A) Vehicle Maintenance records Compliance to use of PPEs	Project area	Bi-weekly Monthly	SPIU E&S Team, Supervision Consultant KSEPA	N2,000,000 ($4807.69) (monitoring costs for construction phase)

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
					N2,000,000 ($4807.69) for PPEs					Daily		
2C	Civil Works	Indiscriminate defecation or open defecation by construction workers	Provision of WASH & toilet facilities for workers	Contractor	N2,000,000 ($4807.69)	Evidence of useable toilets	Site Inspection	Contractor's compliance Absence of open defaecation by workers	Project Area	Weekly	SPIU E&S Team, Supervision Consultant KSEPA	
3C	Civil works, use of materials and machinery	Land degradation and increased susceptibility to erosion due to excavation of earth materials around and in burrow pits	Ensure sourcing of earth materials from registered quarries and licensed construction vendors with appropriate quarry lease to prevent illegal sand mining.	Contractor	-	Revegetation Primary supplier E&S checklist List of licensed vendors	Site inspection Completed E&S checklists and periodic compliance monitoring	Revegetated areas Compliance to E&S requirements	Project site	Monthly	SPIU E&S Team Supervision Consultant. KSEPA	
4C	Use of borrow pits	Abandoned burrow pits may lead to sites for waste dump, breeding sites for communicable diseases	Develop and implement Burrow Pit Management Plan (see Annex 13) to ensure that site is rehabilitated and restored to a safe and stable state. Plan should include measures: Re-contour/grade site to blend with natural topography	Contractor	Costs of borrow pit reclamation to be adequately included in BOQ	Borrow Pit Reclamation Plan	Observation Review of Plan	Availability of Borrow Pit Management Plan Site reclamation after construction	Material burrow site	After Construction phase		
5C	Civil works, Roofing, fixing of doors, Wall finishing and painting	Accidental spillage of lubricants and paints chemical	Buy only required quantity Collect slurry into labelled container Ensure workers use	Contractor	Covered under 1C costs	Number of waste collection containers PPEs available	Site inspection Observation	Contractor's Compliance Use of appropriate PPEs	Project Site	Weekly	SPIU E&S Team Supervision Consultant	

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
			protective PPEs				Incident reports	Absence of incidents				
		Accumulation of solid wastes including construction waste and debris Campsite waste generation	Ensure proper sorting; storage and final disposal of waste, liaise with KSEPA or a licensed waste operator. Implement Waste Management Plan (see annex 5) Ensure recycling of removed materials from through approved recycling facilities to conserve resources. Ensure no waste is left behind at project site after construction	Contractor KSEPA/ Licensed waste operator	N2,000,000 ($4807.69) (across 150 sites)	Waste Management on site Waste Manifest Manifest for waste reuse	Site inspection Verification of documents	Good waste management practices Evidence of waste disposal records	Project Area	Weekly	SPIU E&S Team, KSEPA	Covered as part of IC monitoring costs
6C	Civil works, material handling, machinery usage	Workers accidents such as Injuries, explosions, electrical fires, leakages, falls from height, slips, release of hazardous energy, deaths etc	OHS training and education, implementation of OHSMP: Provision of Hazard Communication Procedures (HAZCOM); Job Hazard Analysis (JHA); OHS Training program Provision of adequate first aid, first aiders, PPE, safety signages (Hausa and English languages). Ensure qualified HSE officer on every team Workers should get a daily induction/toolbox before work commences, use of hazard signs	Contractor	N2,000,000 ($4807.69) (Contracted workers about 3,600 ie. 24 in each site, community workers about 4,200 ie. 28 in each site)	Compliance with OHSMP No of workers Trained on HSE/OHS/ Training reports No of accidents, incidents or injuries Availability and use of appropriate PPEs First Aid Kits	Consultation with workers Site Observation Incident Reports	HSE/OHS Training reports and list of attendees Evidence of Compliance to OHSMP Evidence of use of PPES, caution signs onsite, well-stocked first aid kits Absence of incidents/ accidents	Project Area	Weekly	SPIU E&S Team, Supervision Consultant	Covered as part of 1C monitoring costs

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
7C	Drilling of boreholes	Risk of aquifer over-exploitation and pollution of ground water resources due to borehole drilling	Drilling of borehole should comply minimum specifications, WHO WASH standard on borehole Drilling. 18mdistance from septic tanks (WHO), use of sanitary seal. Care must be taken in the handling and storage of all drilling fluids, oils, greases and fuel on site.	Contractor	Part of construction costs	Location of borehole onsite Borehole specifications Groundwater quality parameters especially heavy metals, BOD, COD	Site inspection Borehole drilling report Lab analysis of groundwater samples	Compliance with siting location and specifications Parameters within permissible limits of FMEnv13	Project Site	Quarterly	SPIU E&S Team, Supervision Consultant KSEPA	
	Sub-Total				**N10,000,000** **($24,038)**							**N2,000,000** **($4807.69)**
	B. Social Impacts											
1D	Civil works, material handling, machinery usage	Community health & safety risks such as accidents especially for school students and community members	Implement community health and safety plan (CASHES in annex 9) and all contractor drivers must adhere to traffic management plan (TMP)and road safety rules. see annex 7 for sample: Avoid night hours for fleet movement, use trained drivers, ensure drivers do not use substances, comply with fleet management standards, vehicles should not be overloaded with materials, use of flagmen and safety cautions in built up areas, avoid movement in market areas on market days, limit movement	Contractor	N1,500,000 ($3605.77) For implementing CASHES and TMP	Training Records Implementation of CASHES and TMP No of Complaints Grievance records	Review of training records Review of compliance to TMP and CASHES Accident/ incident reports Review of Grievance records	Drivers trained by FRSC on road safety and fleet management Installed caution and safety signs in strategic places Absence of traffic incidents Absence of complaints from community	Project Area	Monthly	SPIU E&S Team, Supervision Consultant	Cost covered as part of 1C

13 Soil Quality of the Proposed Project Area

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
			during religious activities, Restricted access to be placed at construction sites etc					persons/ schools				
2D	Civil works, material handling, machinery usage Movement of vehicles, materials and equipment	Fugitive Dust may likely affect the community health & safety especially areas with earth-based roads Noise: disturbance in a serene environment may affect their daily work schedule, psychology and peace of mind	Construction should be maximised during off peak periods/ weekends/holiday Vehicles conveying materials should be covered with tarpaulin Ensure all vehicles and machines undergo service before being brought to site with continuous regular maintenance. Retrofit vehicles/ equipment with sound mufflers Ensure vehicles/ equipment not in use are turned off Ensure the GRM is effective	Contractor SPIU/ GRCs	- N4,000,000 ($9615) for GRM operations: training, complaint boxes, GRCs, Phone lines, sensitization on GRM	Air quality Vehicles with tarpaulin Noise level Complaints/ Grievances	In-situ measurement Vehicle inspection Consultation with residents	Air quality is within permissible limits Contractor's Compliance Absence of grievances/ resolved grievances	Project Area and its corridor	Weekly	SPIU E&S Team, KTSEPA	Cost covered as part of 1C
3D	Recruitment of workers	Unfair and discriminatory recruitment practices which may be exploitative, cause conflicts, potential litigation.	Comply with and implement the Labor Management Plan in the ESMP including: inclusive recruitment, safe work conditions, provision of basic amenities etc.	Contractor	Part of GRM cost above	Consultations with workers Recruitment	Review: Minutes of meetings, Grievance records, recruitment records	Compliance to LMP Minimal complaints	Project Area	Monthly	SPIU E&S Team Supervision Consultant	Covered as part of monitoring costs in 1C

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
		Poor terms and conditions of employment which could lead to poor wages, unsafe work conditions, suboptimal welfare etc.	Workers will have freedom of association and should be sensitised on the available grievance redress channels (see section 6.8)			records Complaints/ grievances Workers strike action Dismissal records	Consultations/ interviews	Resolved strike actions Workers are not victimized for association/ unions			CBMC	
4D	Staging Area, equipment and material parking	Obstruction to movement of students, residents and staff	Limit parking to selected zones	Contractor	-	Area selected In-school access route Grievance records	Site inspection Review of grievance logs	Contractor Compliance Absence of complaints/ resolved complaints	Project site	Monthly	SPIU E&S Team Supervision Consultant	
5D	All project activities	Temporary disruption of school learning activities	Construction should be maximised during off peak periods/ weekends/holiday	Contractor	-	Complaints Grievance records	Review of grievance logs Consultations	Absence of complaints/ resolved complaints	Project schools	Weekly	SPIU E&S Team, CBMC School Management	
6D	Civil works at the classrooms, Labs, administrative block, hostels, Roofing, fixing of doors, Wall finishing and painting	Risk of Child Labour which can lead to Violence Against Children and litigation against existing child protection laws	Ensure that children and minors are not employed directly or indirectly on the project Implement sensitization campaign against child labour Regular stakeholders' meetings All employees and contractor must code of	Contractor SPIU Gender/GBV Officer	-	Categories of employees Number and reports of campaigns and meetings Signed Code of Conduct Prepared & approved CESMP	Documentation Consultations	Contractor Compliance Absence of underaged children Number of complaints	Project Corridor	Bi-monthly	State Ministry of Women Affairs and Social development SPIU E&S Team	

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
			conduct									
7D	Civil works, movement of vehicles conveying materials and equipment	Labour Influx; which may lead to conflicts amongst locals and employees; competition for limited resources such as water, light, materials etc.	Engage local workforce especially as unskilled workers Provide basic amenities for workers like water, health, toilets etc. implement labor influx plan (see annex 10)	Contractor	Part of BOQ and human resource costs in contracts	Number of local work-force Availability of basic amenities	Contract Verification Site inspection Document verification	Contractor compliance to E&S Labor influx plan Number of local employees	Project Corridor	Monthly	SPIU E&S Team Supervision Consultant CBMC	Covered as part of monitoring costs in 1C
8D	Labor Influx and presence of Followers	Occurrence of onsite/off-site, social vices (Fights, harassments, theft, vandalization, drug use etc.) Threat to health and safety of locals Increase in SH/SEA Abuse of minors Abuse of cultural norms Potential for spread of STDs, sexual relations with community members, female students and staff Use of illicit drugs	Sourcing of local workforce from project communities All contractors' workers to be sensitized and sign Code of Conduct (CoC) (see annex 8 for sample CoC) and zero tolerance for sexual integration with students, staff, community Prohibition of drug and alcohol use by workers while on the job through awareness & sensitization on side effects of drug abuse rovide cultural ensitization training to mprove awareness of and ensitivity of workers to ocal cultures, traditions, and ifestyles. Project workers should enjoy the privilege of retreating to visit their families before returning to site.	Contractor Contractor in liaison with GBV Experts CBMC/ Community liaison	- N2,000,000 ($4807.69) for SEA/SH sensitisation refreshers across project locations at least once every quarter	Number of trained Personnel Code of Conducts GBV-GRM Attendance List/ Training reports Monitoring Reports Signages onsite	Attendance list / training report Observation/ review of CoCs Consultations with PAPs/ List of GBV focal persons	Compliance to SEA/SH Action Plan Signed Code of Conducts Available GBV-GRM	Project Area	Monthly	SPIU E&S Team SPIU Gender/GBV Officer Supervision Consultant GBV Officer NPCU Gender Officer Ministry of Women Affairs	N1,000,000 ($2403.8) For monitoring of SEA/SH/Code of Conduct activities

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
			Ensure implementation of the GBV-GRM protocol and appoint GBV focal persons in the project sites Ensure effective services from GBV service providers in the project area to enable survivors access to quality care Sensitise staff, Community leaders, women group, youth group on SEA/SH preventive measures and response plan Signages against tolerance for SEA/SH/GBV to be installed along the project communities/corridor	Contractor SPIU Gender Officer/ GBV Focal persons		Reports/ complaints	Review List of Service Providers Review training report/ attendance list Observation	MOU Signed between the SPIU and the Service Providers Sensitization conducted Evidence of signages onsite/ project communities Absence of minors as workforce			Ministry of Education	
9D	All construction Activities	Security Risks: project workers including NPCU, SPIU, Consultants, contractor workers could fall victim of kidnap, banditry, insurgency, social	Construction areas to be lighted up with flood lights as a way of security for equipment/materials and movement of people in and around the vicinity.	SPIU	Part of SPIU SMP Costs	Security Management Plan Incidents	Security/ incident reports	Compliance to SMP Absence of incidents	Across the State/ Project areas	Continuous	SPIU SPC Police/Army	Part of SPIU SMP costs

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
		conflicts etc	Implement security strategies as stated in 4.3.4 .in addition the project security adviser Inaccessible sites due to security should be mapped out and a security strategy implemented, or the areas avoided	Contractors	Part of Contractor SMP Costs						Ministry of Education	
	Sub-Total				**N7,500,000** **($18,028.8)**							**N1,000,000** **($2403.8)**
				Total Construction Phase	**N17,500,000** **($42,067)**							**N3,000,000)** **($7211.5)**

Operation Phase

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
	A. Environmental & OHS Impacts											
1E	Usage of classroom, WASH and other facilities	Generation of different types of wastes – solid waste, e-waste, sewage	Provide waste bins that are immovable but can be easily tipped off from down or up KSEPA/ WASH Depts in LGAs to ensure periodic waste disposal E-waste to be sent to Material Recovery Facilities/ recycling centres	Head of School/ Principal/School Director KSEPA/ WASH Depts, LGAs	Part of school operation cost from Ministry budget	Waste management practices Waste Manifest	Document inspection Site inspection/ Observation	Good housekeeping	Project Schools	Monthly	SPIU E&S Team CBMC Ministry of Education	N500,000 ($1201.9) for monitoring during 6months of start of operations of the constructed facilities before the project hands over to the Ministry of Education

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
			Sewage to be evacuated periodically									
		Poor maintenance of WASH Facilities may lead to damage of facilities and public health issues Water unavailability may impact cleaning and usage Sanitary pads may clog the sewage	Prepare a maintenance schedule VIP toilets are recommended as opposed to water closets Attach water points/ boreholes to WASH Facilities. Also, VIP toilets require less water than Water Closet Provide covered waste bins for disposable of sanitary pads/ Ministry to provide covered local incinerators in the schools Liaise with SURWASH, UNICEF or similar programs for maintenance of WASH facilities	Principal/Sanitation Teacher SPIU Ministry of Education	Part of school operation cost from Ministry budget	Design Maintenance schedule Water points Waste disposal system	Physical inspection	Good waste management practices Good housekeeping Routine maintenance	WASH Facilities	Quarterly	SPIU E&S Team CBMC Ministry of Education Ministry of Health	
2E	Usage of classroom, WASH and other facilities	Buildings may collapse due to erosion in sites like Musawa/ Community Day Secondary School, Jikamshi	Construction should be done on safer areas / alternative sites. Engineering design should include drainage	SPIU Ministry of	Part of design cost	Design	Visual inspection	Compliance to design and alternative site selection	Affected schools	One -off	SPIU E&S Team Supervision	Covered as part of monitoring costs in 1E

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
		Kusada/Government Pilot JSS Kafarda	construction and proper termination of drainage points for sustainability	Education							Consultant	
3E	Use of Overhead Tanks	The tank could fall and cause accidents. The tank could also rust and pollute the water produced over time. Presence of high nitrate content, acidic PH and micro-organisms in water could cause water pollution, disease outbreak and ill-health	The tank-stand should be adequate and well installed. The tank should be galvanized to prevent rust and should be periodically (half yearly) washed out to remove sludge. Water filtration system which includes Sodium Carbonate and Sodium Hydroxide, reverse osmosis, UV/chlorination system should be included as part of the design and construction of the borehole systems.	Contractor SPIU School Management CBMC Ministry of Education	Part of project installation costs Routine school maintenance budget	Reports of incidents Water quality	Review of reports In-situ/ laboratory water analysis	Tanks are well mounted and accidents avoided Absence of rust in tanks/ periodically maintained Water quality parameters are within stipulated FMEnv limits	Project School	Quarterly	Supervision Consultant CBMC	
	B. Social Impacts											
1F	Usage of classroom, WASH and other facilities Operations	PWD may further be disenfranchised if RAMPs are not provided in the project design for classes / WASH facilities	Ramps should be included in the project design	SPIU SPC, Engineer, SO Ministry of Education	Part of design costs	Design	Visual inspection	Presence of Ramps Inclusion for PWD	Project Schools	One-off	SPIU E&S Team	Covered as part of 1E
2F	Increase in enrolment of Students including student with disabilities	Students with disabilities may be discriminated by other students	SPIU to organize training for school management on non-discrimination of PWDs School management to sensitise students against discrimination of PWDs and	SPIU E&S Officers	N300,000 ($721)	Training Records	Review of records, attendance sheets	Training is conducted or the school management and students	Project Schools	One -off	SPIU E&S Team	Covered as part of 1E

S/No	Activities	Potential Impact	Mitigation Measures	Responsibility for Mitigation	Mitigation Cost (NGN)	Parameters to be measured	Method of measurement	Performance indicator	Sampling Location	Monitoring Frequency	Institutional Responsibility (Monitoring)	Costs (NGN)
			how to integrate them	School Management								
3F		The number of teachers may be insufficient to cater for the rate of student enrolment, especially female teachers	Recruit teachers to support the schools/ construction to be implemented Implement a plan to increase female teacher availability especially for the rural areas including providing incentives, deploying NCE teachers etc.	Ministry of Education	Part of state/ ministry budget	Teacher enrolment No of female teachers	Observation School records	More teachers recruited Availability of female teachers	Project Schools	Annual	CBMC	-
4F	Operations of facilities	Security issues: kidnap of students and school staff	Ensure implementation of security plan to safeguard students and staff Install flood lights and CCTV cameras as part of security measures to capture movement in and around the schools especially in high risk areas	SPIU Ministry of Education in collaboration with security agencies and local communities	Part of Project Design/ Security costs Part of state budget	Security plans Incidents	Review security plan and Incident records	Availability of security strategy	Project schools	Continuous	CBMC	-
	Sub-Total				N300,000 ($721)							**N500,000** **($1201.9)**
	Grand Total				**N25,300,000** **($60,817)**							**N5,150,000** **($12,379.8)**

1USD=N 416, CBN Official Rate – 10/09/2022

7.7 Monitoring and Evaluation Plan

The monitoring and evaluation plan will be the responsibility of the SPIU for all measures outlined in the ESMP matrix but the SPIU can delegate certain responsibilities to its contractors and supervising consultant. Such delegation of responsibility shall be documented as part of contractual agreements to guarantee compliance and commitment on the part of the supervising consultant to supervise and on the part of the contractors to implement the ESMP. As most of the mitigation measures are the obligations of the Contractor during project implementation, the contractor shall prepare the Contractor's ESMP (C-ESMP) considering the measures in this ESMP and other E&S Plans including the GBV Action Plan, Labour Management Plan, GRM.

7.7.1 Monitoring Plan

The monitoring plan (Internal and External Monitoring) for the ESMP is presented in the table 18 below. Monitoring results shall be documented with preventive/corrective actions to be implemented

Table 18: Monitoring Plan for the ESMP

Monitoring	Action	Responsibility	Period	Performance Indicator
Internal Monitoring	Regular site visit to ensure that the mitigation measures and actions specified in the ESMP are implemented and as bound by the contract is satisfactorily implemented.	E&S Officers from the SPIU	During Preconstruction, Construction and Operation Phases	Monitoring Reports and documentation as described below
	Daily monitoring of the contractor performance and adherence to GBV/SEA/SH obligations	Supervision Consultant GBV Specialist	During Preconstruction and Construction phases	Monitoring Reports presented to the SPIU.
	Site visits for supervision and inspection to ensure contractor adhere strictly to the E&S requirements of the project	Supervising Consultant Environmental, Social, GBV specialists	During Preconstruction and Construction phases	Observations and Monitoring Reports presented to the SPIU.
External Monitoring	Periodic site visit to ensure project is implemented in an environmentally & socially sustainable manner using the monitoring indicators specified in the ESMP Matrix and other national and international environmental & social requirements	CBMC NPCU KSEPA, FMEnv and other relevant MDAs.	During Preconstruction, Construction and Operation Phases	Inspect monitoring reports from SPIU E&S unit Provide feedback on observations. Enforce corrective actions where necessary.
	Periodic monitoring of timely, mandatory and confidential reporting for E&S activities	Third Party Monitors	During Preconstruction, Construction and Operation Phases	Monitoring Reports presented to the SPIU, NPCU, WB

7.7.2 Reporting Plan

The reporting procedures presented in table 19 below have been developed in order to ensure that the SPIU is able to receive feedback from the implementation of the ESMP on an on-going basis and to take rapid corrective actions if there are issues of non-conformance.

Table 19: Reporting Plan

Phase	Responsibility	Deliverables	Frequency	Accountability
Preconstruction	E&S Unit	Report of monitoring activities including any specific events	Bi-weekly	PC of the SPIU, NPCU, KSEPA on request
Construction	E&S Unit Supervision Consultant CBMC	Monitoring Reports of E&S Compliance from all project sites Quarterly, half-yearly and annual reports for the attention of the NPCU/WB	Monthly/ Quarterly/ Half yearly/ annual	PC of the SPIU, NPCU, State MDAs including KSEPA, Education, Women Affairs, World Bank
	E&S Unit Supervision Consultant CBMC	Additional Reports according to specific conditions e.g. Accidents, serious environmental/social impacts, grievances	As required	PC of the SPIU, NPCU, World Bank
	Third Party Monitors	Reports on effective implementation of E&S activities	Quarterly/ Annual	PC of the SPIU, NPCU, World Bank
Operation	E&S Unit CBMC	Monitoring Report including all monitoring activities throughout project implementation	Once	Chairman CBMC, PC SPIU, NPCU, Ministry of Education. Report to be archived and made available on request

7.7.3 Record Keeping

The contractor is required to keep records providing evidence of ongoing mitigation activities. Such records may include site monitoring plan, Site Specific HSE Plan, Waste Management Plan, Traffic Control Plan, signed Code of Conducts, Emergency response and preparedness procedures, site instructions, training records, complaints records, incident report, Inspection, maintenance, and equipment calibration records. These documents should be made available to the E&S Team of the SPIU upon request.

The supervision consultants E&S team are required to keep records of non-compliance and corrective actions taken. These documents should be made available to the supervision consultants and E&S Team of the SPIU upon request.

The E&S team, SPIU is also required to keep records to provide evidence of monitoring activities and effectiveness of the monitoring plan. The site monitoring plan will identify problems/corrective actions and monitoring reports. These documents shall be made available to the NPCU, World Bank and other relevant regulators upon request. In addition, all significant communications with MDAs should be documented and kept. These documents are required to track performance in order to achieve and demonstrate compliance with the monitoring plan and applicable regulatory requirements.

7.8 ESMP Implementation Schedule

It is expected that the activities related to the ESMP Matrix as seen above should to be factored into the overall construction schedule. The project implementation phase is estimated to be completed in 6-18 months. The implementation schedule is presented below

Table 20: ESMP Implementation Schedule

No.	Activity Description	Responsibility	Prior to Contract Award for Civil Works	Pre-Construction	Construction	Operation
1	Clearance & Disclosure of ESMP	SPIU	√			
	Inclusion of Environmental & Social Requirements in Bid Documents	SPIU				
2	Finalization of Engineering Designs	SPIU/Engineering Design Consultant	√			
3	Environmental and Social Training for SPIU, MDAs, CBMC	SPIU	√			
4			√			
5	Environmental and Social Training for Contractor workers	SPIU/Contractor		√		
6	Review and Approval of Contractor's ESMP, Waste & OH & Safety Plan	SPIU		√		
7	Mobilization to site	Contractor		√		
8	Construction Phase	Contractor			√	
9	Implementation of Mitigation Measures	Contractor		√	√	√
10	Supervising ESMP Implementation	SPIU/ Supervising Consultant		√	√	√
11	Monitoring & Reporting on ESMP Implementation	SPIU/Relevant MDAs/CBMC		√	√	√
12	Environmental and Social Auditing	Environmental and Social Consultant			√	√

7.9 Contractual Measures

As seen in the ESMP Matrix table, majority of the mitigation measures are the obligation of the Contractor during the pre-construction and construction phases of the project. Consequently, the potential contractors will have to prepare their proposals taking into account the measures in the table as well as other identified E&S plans. Compliance measures are stipulated in table 21 below.

Table 21: Contractual Measures for Contractors

Actions	Remarks
All measures as described in the ESMP Matrix shall be included in the tender documents with appropriate flexibility to adjust these measures to site circumstances, and that the potential contractor will have to prepare their proposals taking into account these measures.	The non-inclusion of these measures in the proposal will lead to a disqualification of the proponent. The contract with the successful bidder should contain these environmental and social management measures as firm conditions to be complied with.
Specifically, the measures should be translated into a suite of environmental specification that are written in the same language style and format as the rest of the contract document	This approach will ensure that the environmental and social controls integrate seamlessly into the tender document and are presented in a familiar form to the Contractor
The cost for mitigation measures should be added into the cost of the contractual document as provisional sum	The contactor must consider and put the cost for the environmental and social mitigation requirements specified in the ESMP.
The Contractor is expected to prepare a Contractor's Environmental and Social Management Plan (C-ESMP) which should emphasise specifically, the Contractor's approach to minimizing environmental and social impacts during implementation of activities. The C-ESMP should take guidance from the Contractor's mitigation responsibilities as presented in the ESMP. It is important to note that the C-ESMP must be submitted by the Contractor and approved by the E&S Team of the SPIU before civil works commence	The SPIU must verify and ensure consistency of the ESMP and the CESMP while the Bank's task team will confirm such verification. If issues emerge during implementation, of which the C-ESMP does not contain appropriate mitigation measures, the PIU will need to have the Contractor update the C-ESMP
Contractor's Code of Conduct – Preventing GBV and Violence Against Child (VAC): Contractors and contractor workers shall sign Code of Conducts as prepared by the project. This will form part of the bids/contract agreement. To a minimum, the Code of Conduct should address: Standards of Conduct such as work ethics, prevention against GBV/SEA/SH, child labour, use of substance	The Contractor's Code of Conduct indicates the contractor's commitment to be of best behaviour and comply professionally with the requirements of its contract and E&S requirements of the project
Individual Code of Conduct Preventing SH/SEA and Violence Against Child (VAC): To a minimum, the individual code of conduct should spell out acceptable behaviour, consequence of violation, the routes for resolution of conflicts in any instance where personal interests conflict general interests regarding to the project work, outside work conduct, due diligence in providing required services, individual commitment to sustainable environmental practice during project implementation activities.	The Individual Code of Conduct indicates the employee's commitment to be of best behaviour and comply professionally with the requirements of his/her contract with the Contractor
Manager's Code of Conduct Preventing SH/SEA and Violence Against Child (VAC): The Manager's Code of Conduct should to a minimum, will address: Manager's obligations to workers which include work ethics, prevention against GBV/SEA/SH, child labour, use of substance	The Manager's Code of Conduct indicates the Manager's commitment to employee welfare and work procedures and ethics

7.10 ESMP Implementation Cost

The summary of the cost for the implementation of the ESMP is presented in the Table 22 below. The total costs of the ESMP including costs for mitigation and monitoring and capacity building is estimated as: Thirty-Nine Million, Four Hundred and Ninety Thousand Naira (N39,490,000.00) only.

Table 22: Summary of ESMP Implementation Budget

S/N	Item	Responsibility	Estimated Cost (NGN)
1.	Mitigation	Contractor	N25,300,000 ($60,817.38)
2.	Monitoring	SPIU, MDAs	N5,150,000 ($12,379.8)
3.	Capacity Building	SPIU/Contractor	N4,300,000 ($10,336.54)
4.	Disclosure Costs	SPIU	N1,150,000 ($2764.4)
5.	**Sub – Total**		N35,900,000) ($86298.07)
6.	Contingency	10% of Sub-Total	N3,590,000 ($8,629.808)
	TOTAL		**N39,490,000.00 ($94,927.88)**

* *Majority of the costs will be the responsibility of the contractor as will be embedded in the contractors BOQ.*

**Conversion rate:1USD = N416: CBN Rate: as at 10/09/2022*

Chapter Eight –Stakeholder Engagement and Public Consultation

8.1 Introduction

AGILE project has developed a Stakeholders Engagement Plan which identified the need and process for stakeholder engagement throughout the lifecycle of the project. It further identified the various categories of stakeholders critical to the project either as beneficiaries, influence groups or interest groups.

As part of the ESMP, extensive consultations were held between 14th – 30th June 2022 with the SPIU, State Ministries, Departments & Agencies as listed in section 8.4 below, across all 34 LGAs as covered by the project, 126 project schools in 62 communities (some communities host 2 or 3 of the proposed schools). 24 school locations/host communities not visited was due to insecurity. 60 enumerators from the state (all graduates) were trained by the ESMP consultants' team and supported the data gathering, socio-economics and consultation process.

The consultations served as platforms to elicit information, questions and concerns relevant to the project. It also provided the opportunity for project beneficiaries to contribute to both the design and implementation of the project activities and further ameliorate the likelihood for conflicts. It also provides an avenue to intimate the PAPs of their choices and rights with regards to the project. Participants at the community meetings comprised of the ward heads, village heads, traditional rulers, community leaders, religious leaders, women and youths, while those in the school meetings included school principals & management staff, teachers and students. In addition, consultation was also held with Persons with Disabilities.

Concerns raised by the stakeholders are documented and incorporated in this report and aided the development of mitigation and/or enhancement measures and also the design of the GRM.

8.2 Stakeholder Identification

Table 23: Identified Stakeholder Categories

Stakeholder Identification and Categorization	
Primary (Beneficiaries/Impacts)	**Secondary** (Influence/Interest)
Students – male & female students (JSS & SSS)	Parents, Guardians, Caregivers
Teachers – male & female (permanent, others)	Zonal Educational Directors
Out-of-school children (especially adolescent girls) within the community	Traditional Leaders, Religious Leaders
School management and staff	Katsina AGILE SPIU
CBMC, Community Leaders and community members including ward heads, village heads, youth, women	Katsina State Ministry of Education
	Katsina State Ministry of Environment
	Katsina State Government
	Katsina State Ministry of Women Affairs
	SUBEB, Kano State Secondary Schools Management Board (KSSSMB), Science and Technical Education Board,
	State Project Steering Committee
	National Project Coordinating Unit (NPCU)
	Federal Ministry of Education

8.3 Stakeholder Engagement Plan (SEP)

AGILE prepared a Stakeholder Engagement Plan to guide implementation of stakeholder engagement in all the states. Table 24 below presents an extract of that plan as it applies to the new construction sub-project.

Table 24: Stakeholder Engagement Plan

Project Phase	Project Activities	Target Group	Method
Pre-construction	Disclosure of relevant project information Identification of proposed project location and area of influence ESMP disclosure	Parents/ Caregivers/ Guardians Students School Staff & Management Community Based Management Committee (CBMC) Benefitting communities Traditional and religious leaders MDAs including Education, Environment, Women Affairs etc.	Consultations with parents/guardians, students, school staff & management, communities, village heads, youth leaders, women groups and representatives of various association Invitation through school Heads Disclosure of ESMP at School level, LGAs, SME, SPIU, National & Local Dailies
Construction	Construction – Civil Works ESMP Implementation ESMP Monitoring Training on SEA/SH/GBV Training on GRM	Community leaders and members including women, youth School management, staff, students MDAs CBMCs GRCs	Consultation with school management, communities, village heads, youth leaders, women groups and MDAs Information via school Heads and community leaders Formal and informal training for community members, school staff and students
Operation	De-mobilization Audit/ Post construction evaluation School Maintenance	Community leaders School management Benefitting communities CBMCs GRCs MDAs	Consultation with school management, communities, village heads, youth leaders, women groups and MDAs Information via school Heads Distribution of fliers to the locals printed in English and Hausa languages Arrangement of monitoring responsibilities to stakeholder Agencies

8.4 Summary of Consultations

This section contains summary of consultations with benefitting schools, project communities, relevant MDAs (environment, education, women affairs, FRSC, KSEPA, NSCDC, SUBEB, KSSSMB)

8.4.1 Consultation with Benefitting Schools

Consultations with Benefitting Schools
Date: 14th -30th June 2022
Venue: Project Schools as listed in annex 18
Participants: School management, Principal, staff

Consultations were held with the various stakeholders at the project sites. In attendance were School Principals, Vice Principals, SBMC Chairman, PTA Chairman, Community Representatives (Male and Female), representative(s) of the AGILE SPIU and the E&S Consultants. Following introductions, the representative of the AGILE project and the E&S Consultants introduced the project and ESMP process and objectives to the stakeholders present. The Consultant further highlighted potential environmental and social risks and impacts that may be caused by the project activities and emphasised the role that each stakeholder had to play to ensure that the impacts are, in collaboration with the SPIU adequately mitigated.

Across most schools visited, there were homogenous concerns and responses from stakeholders as stated below:

No.	Agenda	Remark/Questions from AGILE Team	Remark/Questions from Stakeholders	Response from AGILE Team	Response from Stakeholders
1	Perception of the project	• The team inquired about their awareness and perception of the AGILE project. • Also went further to elucidate the positive impacts of the project	• They affirmed that they are aware of AGILE, and they had developed their School Improvement Plan (SIP), they complained about deficient infrastructure especially for places where there are currently no senior secondary schools, hence they were happy that AGILE will help in bridging these gaps. • Some schools that did not have perimeter fencing inquired if this will be covered by the project	The AGILE team responded that each school are given the opportunity to identify what they intend to achieve under the School Improvement Plan (SIP) and also the type of works they want within the available funds. Fencing will be implemented in schools that indicated this activity in their SIP, while those who may not have indicated this were encouraged to write to the Ministry to table their needs for possible future intervention/support	• The management also appreciated AGILE for the extensive stakeholder consultations they have been holding with them. • They are willing to give their commitment to support the project as may be required
2	Potential adverse impacts	The E&S consultant informed the school about the objectives of the ESMP. Specifically, construction works may disturb academic activities, expose the staff and students to risks of SEA/SH/GBV. Also, there could be conflicts between contractor workers and school staff/students, which are part of the envisaged negative	• N/A	• The consultant explained that usually where practicable it will be good for construction activities to be implemented during holidays or weekends. • Additional measures such as use of noise mufflers in machinery and vehicles will be recommended to minimise disturbance	• The students make use of a section of the school which is away from the new construction area thus there will be less interference. • The school management will support to sensitise the students and teachers especially the females on ways to avoid been exposed to SEA/SH.

		impacts of the project		• The AGILE team will conduct sensitisation on SEA/SH/GBV in the schools and project communities, in addition Contractors will be trained and sign Code of Conducts against GBV/SEA/SH. • Additionally, a GRM and GBV-GRM protocol will be set up to enable stakeholders channel their grievances for timely redress which will include setting up GRCs, complaint boxes, phone number, site meetings and consultations etc.	• The management also promised to coordinate the activities of the contractors and will be supported by the CBMC. • They stated that usually complaints are settled by the community head. In any case the GRM was a welcome idea.
3	Concerns raised by stakeholders	Stakeholders were encouraged to raise any concerns or questions they may have about the project	• In some schools due to lack of adequate toilets, female students share toilets with female staff which is not good, and they wanted to know if this is the model in the proposed design for construction • In most schools water availability is an issue for the students and staff, and they wanted if AGILE Project will support with this. • School Principals were eager to know when the construction works will begin as they have been expectant	• The team explained that this will not be the case as the design is for student toilets to be separate from teachers/admin toilets. In both cases female toilets will be separate from male toilets. • For schools that indicated provision of borehole as part of their SIP, this will be provided. Others were encouraged to table their request to the Ministry of Education for future intervention • There are some procedures which are required to be put in place before construction works can begin, such as preparation of this ESMP to ensure that the environment and people are protected from negative impacts that may be attributed with project activities and support project sustainability	• This information was duly appreciated
4	Opportunities for Women		The principals complained on the absence of enough teachers	The AGILE team informed them that in support of the AGILE	The information was appreciated, and they will be happy if more

			especially female teachers in the schools in the rural areas.	project the Ministry of Education plans to recruit 2,000 additional teachers especially female teachers	female teachers come on board

8.4.2 Consultation with Project Communities

Consultations with Project Communities **Date:** 14th – 30th June 2022 **Venue:** Project Communities as listed in annex 19					
Overview					
Consultations were held with the various stakeholders in the project communities. In attendance were Community leaders (village/ward heads), Community Representatives (Male and Female), youth. Following introductions, the representative of the AGILE project and the E&S Consultants introduced the project and ESMP process and objectives to the stakeholders present. The Consultant further highlighted potential environmental and social risks and impacts that may be caused by the project activities and emphasised the role that each stakeholder had to play to ensure that the impacts are adequately mitigated in collaboration with the SPIU adequately.					
Across most communities visited, there were homogenous concerns and responses from stakeholders as stated below:					
No.	**Agenda**	**Remark/Questions from AGILE Team**	**Remark/Questions from Stakeholders**	**Response from AGILE Team**	**Response from AGILE Stakeholders**
1	Perception of the project	• The team inquired about their awareness and perception of the AGILE project. • Also went further to elucidate the positive impacts of the project	The communities were happy with the new development in the community as they have been yearning for a senior school within the community for a long time. Most especially as the girl child will find it easy to further their education without difficulties when new classes, toilets and the rest are constructed.	The team informed them that one of the goals of the project is to provide access to senior school education especially for girls	They promised to give their maximum support for the success of the project.
2	Potential adverse impacts	The E&S consultant informed the communities about the objectives of the ESMP. Specifically, the communities were informed that movement of vehicles carrying equipment and materials may disturb the communities and cause accidents to community members. Influx of workers may also pose	• Some communities stated that the location of the schools are not too close to the residential houses and the construction vehicles will have enough access to the school without disturbance to the community. • Other schools stated that as long as they inform their people about the construction activity, no issues are	• The E&S consultants explained that measures to mitigate these risks will be included in the ESMP including how to minimise noise by installing noise mufflers and traffic by implementing TMP. Work hours will also be limited to 8.00am – 5.00pm to avoid disturbing rest periods. • The project will ensure training and	• These proposed measures were well appreciated, however, they stated that disturbance will not be an issue as they are far more anxious for the project to be implemented for the benefit of their children/wards. • They will also support and participate in the GRM process as will be required from them.

		risks of conflicts, SEA/SH/GBV and impact on cultural norms.	envisaged with the contractors. • Furthermore, the village/ward/district head will always be available to solve any of such issues should they come up, and where this cannot be handled it is reported to the Emir or police for legal action	signing of code of conducts by all workers, training of drivers by FRSC, continuous consultations with the communities amongst others. • In addition, an effective GRM will be in place which will embed the existing conflict resolution structures in the community, to enable affected people lodge their complaints to the project.	
3	Concerns raised by stakeholders	They were encouraged to voice any concerns or inquires they have about the project	• In many communities, stakeholders wanted to know how their youth can be engaged in the construction works. • They also inquired when the actual work will start as they have received several promises but are yet to see any structure on ground	• The team explained that contractors will be informed to maximise engagement of unskilled labor from the project communities as this will foster synergy of execution and create additional benefit to the communities especially the youth. • With respect to project start, there are steps that are required to be fulfilled s part of planning before the physical work can start, such as the ongoing ESMP being developed which is for the benefit of the stakeholders themselves. • The AGILE team also assured them that work will soon commence	They promised their support for the project and prayed that the construction will commence soon.

8.4.3 Consultation with MDAs

Date: 22nd – 24th June 2022
Venue: MDA Offices

Overview

Consultations were held with various MDAs at the state level including Ministry of Education, Environment, KTSEPA, Women Affairs, FRSC, SUBEB

Organisation	Participants	Key Discussions	Response
Ministry of Education	Commissioner, Permanent Secretary (PS), Director Quality Assurance, AD Planning	**Commissioners Office** • The Commissioner reiterated the Ministry's commitment to AGILE including approval to deploy 2000 new teachers for the new construction works to ensure adequate teachers for the facilities. • A technical team was put together for the designs of the new construction works. • The stakeholders were anxious to know when the construction works will begin as the process is taking too long and stakeholders are becoming apprehensive • The E&S team sought to know the role the Ministry will play in resolving grievances that may arise from the project execution. • The E&S consultants also enquired on whether the Ministry will be willing to pay compensation in the event of any land acquisition, affected crops or livelihoods as this is usually paid from state funds and not donor funds. • The issue of security for the school students was also asked amidst the security issues plaguing schools **Quality Assurance Office** • The Director of Quality Assurance (QA) informed the team that the Ministry also manages quality of teachers, teaching materials, laboratories, library etc. this is done with the help of the zonal education quality assurance offices, and this will be assured under AGILE Project. • The E&S team raised a concern about the few numbers of female teachers which are available to support the AGILE project during the operation phase considering the targeted increase in female students enrolment. **AD Planning** • He stated that the SPIU will need to ensure engagement of good contractors that will deliver quality job and good materials. • The E&S team asked to how the Ministry was planning for inclusion of Persons with Disabilities in AGILE project. • He was also asked whether the construction of secondary schools on primary school lands will impact on future expansion of primary schools.	• The E&S team appreciated the Commissioner for their demonstrated commitment. • They were assured that once the World Bank's processes were complied with the construction will start. The approval of the ESMP is one of such requirements. • The Commissioner and PS responded that the steering committee at the state level will ensure that grievances beyond the resolution of the community level and SPIU level will be handled by the committee and effectively resolved. • The Commissioner explained that most of the schools are existing schools on Government land, however, in the event that compensation is required the Ministry will be willing to settle the PAPs as will be required by the project • The stakeholders stated that the state Government has deployed security to guard the schools including Army, police, NSCDC, local vigilantes • The director QA explained that there are more female teachers than males in schools in the city however, for the rural areas most female teachers do not want to leave their families and go to the rural areas, however, if incentives can be given this will help. In addition, teachers should be recruited based on those residing in the LGAs and not just whether you hail from the LGA. NCE graduates can also be posted to these areas with incentives and they will comply The SPIU will conduct due diligence before engagement of contractors. • The AD Planning stated that the construction designs have made provisions for access ramps which will enable Persons with Disabilities benefit from the construction. • On the issue of building in existing primary schools, he stated that one

			of the criteria for selection of such schools was based on available large land expanse which will not hamper any future expansion of the primary schools. Also, presently, there is more deficit of secondary schools.
Ministry of Women Affairs	Skills Acquisition Officer, Gender Officer	• The skills development officer explained that they help to incorporate skills acquisition programmes for girls in schools. They also informed the team of the concerns from the male student counterparts who feel left out in most developmental support now as most emphasis is on the girls such as giving them books, school bags, incentives and programmes, which is leading to some of them dropping out. Though the state is making efforts to engage boys in some programs under UNICEF. • The E&S consultant enquired on how the Ministry handles SEA/SH/GBV related cases from schools.	• The E&S team explained that some of the construction works will be implemented in mixed schools hence boys will also benefit. The Ministry was also encouraged to find ways to support boys as well including in sensitisation/ training programmes that may not even involve money. • The Gender Officer stated that the Women Development Department is in charge of such cases and once the cases are reported to them by the School Principals they provide psycho-social support, livelihood support and skills training to empower the survivors.
Ministry of Environment, KTSEPA	Director Waste Management and Environmental Assessment, Environmental Officer	• The Director appreciated the team for coming to discuss the preparation of the ESMP and to obtain details of the likely environmental issues in Katsina/ the project locations and how they can be addressed. He stated that many ESIAs/ESMPs done do not usually involve them which is not proper. • The E&S Consultant stated that waste management from construction works will be a major consideration under the project and enquired how the ministry handles such issues. • The Consultant also asked if the state was engaged in any recycling activities which can be promoted as part of waste management strategies under AGILE. • The issue on human waste from contractors on site was also discussed as in some cases the contractor workers practice open defaecation and this will cause pollution issues in the school/communities and may also cause conflicts.	• The E&S team informed him that it is good practice for the Ministry of Environment and KTSEPA to be consulted during preparation of any environmental document. Furthermore, they will play a role in disclosure and external monitoring of environmental parameters during implementation. • The state environment team explained that they have WASH departments in every LGA who are responsible for waste management at the community level. In addition, KTSEPA has designated dumpsites across the states. • It was agreed that the Contractors will liaise with KTSEPA on waste management for the project, and a waste management plan will be included in the ESMP report. Also, once the ESMP is finalised there will be a training for all stakeholders involved in implementation of the ESMP. • In addition, the Katsina AGILE ESO will obtain a list of all the approved dumpsites in the state which will aid compliance monitoring during construction. With respect to recycling, the Environmental Officer explained that there was a Material Recovery Facility (MRF) along Jibiya road, assisted by Ecological Fund Office. The facility conducts sorting of waste, batching and sell to recycling facilities in Kano. This option of waste management will be explored by the Contractors/AGILE for e-waste management. With respect to sewage and hygiene management for the schools, Katsina AGILE SPIU and the Ministry of Education will liaise with SURWASH which is another World Bank supported project for support in addition to other interventions as may be identified • It was agreed that Contractors can construct makeshift toilets which can be handed over to the school for use by teachers/staff as an additional positive impact of the project.
Federal Road	Head of Admin,	The E&S team informed them about the AGILE project and the expected	• The Officers stated that FRSC usually assists such projects with traffic

Safety Corps (FRSC), Katsina	Admin Officers	movement of vehicles carrying equipment, materials to site which may cause traffic, road accidents etc. and wished to know the role FRSC can play in assisting the project	control especially at busy/major junctions, they can also train drivers on road safety, use of cautions, signages and issue them with the required fleet standards. They can also ensure that caution signs are adequately placed by contractors in strategic locations in the communities especially in built up areas • The E&S team informed them that this will be captured in the report and it will be recommended that they are brought on board to support the project at the right time.

8.4.4 Consultation with Women

Consultations with Women

Date: 18th – 24th June 2022
Venue: Project Communities

Participants: Community women, female teachers

Overview

Consultations were held, with some women from the 62 project communities visited and in attendance were some female teachers. The women were enlightened on the AGILE project by the E&S team and the objectives of the ESMP process. The Consultant further stated that the importance of consulting with the women was to ensure they voice out their concerns, provide suggestions and recommendations which will be documented in the ESMP report and improve project design to ensure women inclusion.
The Consultant further highlighted potential environmental and social risks and impacts that may be caused by the project activities and emphasised the role that each stakeholder especially women have to play to ensure that the impacts are adequately mitigated in collaboration with the SPIU.

The women appreciated the team and expressed their concerns/questions which were addressed by the AGILE/ E&S team. The summary of the key concerns/questions/issues raised during the consultations at the project sites are summarized below.

No.	Agenda	Remark/Questions form AGILE Team	Remark/Questions from Women	Response from AGILE Team	Response from Stakeholders
1	Perception of the project	The team explained that the ESMP is designed to identify and enhance positive impacts of the project and ways to address negative impacts to the environmental and the people	The women expressed their joy over the coming of the AGILE project as it will provide opportunity for their girls to further their education, especially when they have to travel far distance to access education which has discouraged female education.	The E&S team explained to them the importance of women inclusion in the project	N/A
2	Discussions/ Concerns raised by stakeholders	The E&S team inquired to know the level of women involvement in decision making and if they have any concerns with their female children going to school	The women explained that they are involved in some major decision- making in the community, and that they were also given the freedom to make their own decisions.	The AGILE team explained to them that the Ministry of Education has presently initiated a plan to recruit 2,000 teachers to support the AGILE project with high emphasis on female teachers.	The women were very happy with the information and that AGILE deemed it necessary to consult with them specially

			The women stated that female children are encouraged to go to school, but due to financial constraints, most of the parents, find it difficult sponsoring their children to school, instead the boys were sent to farms, while the girls were either married off or sent to hawk, as means of survival. They expressed concerns on the shortage of female teachers in the schools in the rural area who are supposed to act as mentors to the girls	Other strategies will also be recommended in the ESMP including providing incentives for female teachers willing to teach in the rural areas. The team also explained to them about one of the components of AGILE to provide financial aid to some girls whose parents cannot afford to send them to school and to also provide them with incentives to help encourage them to focus on their education.	
3	Potential Adverse Impact	The E&S team explained that some negative impacts may be associated with the proposed construction works including potential waste, traffic, noise disturbance, conflicts with contractors, presence of foreign workers which can increase risk of SEA/SH/GBV, spread of STDs, unwanted pregnancy amongst others. These terminologies were also explained to them. The women will play a critical role in sensitizing their girls to stay away from any relations with the contractor workers, avoid going to their camps or being alone with them. They were also told that the SPIU will organize training and sensitization on prevention of SEA/SH/GBV and the available response and referral pathways	The women appreciated the honest explanation, and they are willing to participate actively in GBV/SEA/SH sensitisation programs and also help in sensitizing their girls on prevention and safety measures	N/A	N/A
	How grievances from women are handled	The women were asked how they channel their grievances to seek redress	They explained that their grievances are either channeled to their women leaders or to the community leader (village head/ward head) and it is usually resolved	The AGILE team explained that the project will set up a GRM which will enable them to channel any complaints they have about the project which includes reporting to the school principal, community leader, phone	N/A

				number, complaint boxes which will be placed in the community. For GBV/SEA/SH, unwanted pregnancy related complaints, this can be reported to the school guidance counselor or Principal.	
4	Conclusion	The E&S team explained that women will have the opportunity to be part of the project, some can work as unskilled labor (provided they are not exposed to hazardous situation), selling of food, water and petty trading	The women were happy to hear this and urged that the project should commence as soon as possible	N/A	N/A

8.4.5 Consultations with Persons with Disabilities

Consultations with Persons with Disabilities

Date: 21st - 26th June 2022
Venue: Project Schools – Barkiya and Charanchi LGAs
Participants: PWD

Overview

The E&S team carried out private consultations with some of the students with disabilities in the schools, and enlightened them on the importance of ESMP, and why it is critical to have their inputs in the project.
Their concerns and remarks were noted, and below is a summary of the consultations held.

No.	Agenda	Remark/Questions	Response
1	Challenges Encountered	The students stated that one of the challenges they face is discrimination by fellow students and mockery, which most often makes them feel uninterested in furthering their education. Another challenge most disabled students face is the distance they have to cover to get to their schools, and the lack of wheelchairs makes it even more difficult The absence of ramps within the school premises and WASH facilities causes hindrance in their daily activities within the school.	The E&S team told them that these are some of the objectives of the project. This particular component deals with new construction works while there are other components that deal will rehabilitation, provision of furniture amongst others.
2	Potential Adverse Impacts	The student were informed that the construction works may disturb academic activities from the civil works activities, however, the ESMP will recommend ways to mitigate this such as maximizing weekends, holidays etc. for major works.	They were happy about the stated mitigation measures and stated that the summer holiday is usually long from July – September and can be maximized
3	Conclusion	They were informed that there will be available GRM for them to channel their complaints and receive redress which includes reporting to the Principal, guidance counselor, teachers, headboy/head girl, use the complaint box, phone line etc.	The GRM was duly noted and they stated that the channels will be adopted if there are complaints about the project

8.4.6 Consultations with Students

Consultations with Students

Date: 16th – 24th June 2022
Venue: Project Schools
Participants: Students

Overview

Consultations were held with some of the students in 22 selected schools (in most cases consultations with students were not encouraged since permission was not sought from their parents) ; in attendance were the Head boy and the Head girl of the schools. They were briefed on the AGILE project and the significance of carrying out an ESMP, and as primary stakeholders in the project; their concerns were noted and documented for further actions.

No.	Agenda	Remark/Questions	Response
1	Perception of the project	• They were excited about the AGILE project and stated that it will help provide additional facilities for them because their classes were currently crowded, while others stated the inadequacy of school furniture to use in the classes. • The girls were excited about the WASH facilities to be constructed because they have inadequate toilets in most schools and no water.	The E&S team informed them these activities such as new classes, rehabilitation, furniture, WASH and boreholes amongst others were included in the AGILE project.
2	Potential Adverse Impact	• The student were informed that the construction works may disturb academic activities from the civil works activities, however, the ESMP will recommend ways to mitigate this such as maximizing weekends, holidays etc. for major works. • There is also a risk of child labor and school dropout to seek construction work, however, this is prohibited by the project and construction works can be stopped if child labor is encountered.	The students promised that they will be of their best behaviour and that the school management should try and sensitise all students that none of them should leave school because of the construction works as it is a temporary work while their education will give them a better future. Also, that the project prohibits child labor and this could lead to stoppage of the construction works. With this they believe the students will comply
3	Conclusion	• They were informed that there will be available GRM for them to channel their complaints and receive redress which includes reporting to the Principal, guidance counselor, teachers, headboy/head girl, use the complaint box, phone line etc.	The GRM was duly noted and they stated that the channels will be adopted if there are complaints about the project

Chapter Nine – Summary and Recommendations

The proposed new construction works in 150 schools for both JSS and SSS will largely be beneficial for students, communities and the state at large, furthermore it will reduce the rate of school dropouts by making education more accessible and allowing for continuity from the junior to senior secondary school.

Based on the findings from the ESMP, the potential negative environmental and social impacts/risks can be mitigated/managed with strict adherence to the measures stated in this ESMP. The ESMP and the mitigation costs will need to be embedded in the contractors BOQ to ensure implementation costs are adequately budgeted for by the contractors. Additionally, the Katsina AGILE SPIU will need to ensure the E&S staff of the contractors and agencies involved in the monitoring activities are adequately trained in line with the capacity building plan in the report, which has budgetary allocations.

The following recommendations are provided below. The following will have to be embedded in the engineering designs based on the ESMP findings before finalisation of designs:

- Provision for Sodium Carbonate and Sodium Hydroxide in the filtration system for the boreholes in areas with acidic water content
- Water in areas with high nitrate content in water or soil should be treated by including reverse osmosis filtration system (RO machines) in the design and apparatus for the borehole system.
- The project should include the use of Ultraviolet (UV) disinfection system which is a part of the water filtration system as part of the design for the borehole system. Another option is chlorination which is most commonly used in Nigeria as part of the borehole filtration system.
- The minimum allowable distance between the septic tank and borehole water according to WHO standard is 18 meters (WHO, 2016). This is to reduce the risk of the potential source of contamination from the septic tank.
- The PIU to ensure adequate budget provisions are made for the monitoring costs, GRM activities and GBV activities to ensure effective monitoring of the implementation of mitigation measures
- The SPIU should adhere to the capacity building plan in the ESMP to enhance the capacity for monitoring implementation of mitigation measures. It is also important for School management to sensitise their students on non-discrimination of students with disabilities and the available channels for students and staff to lodge any complaints about the project
- The E&S team will need to be part of bid evaluation process for civil works to ensure that all ESHS requirements are embedded in the bids including appropriate staffing for E&S in the contractor team, Environmental and Social – Management Strategies and Implementation Plans (ES-MSIPs) and costs for ESMP mitigation
- The SPIU to ensure that the ESMP report is provided to the contractors to enable them to understand the extent of E&S actions required, and also help them prepare their Contractors-ESMP (C-ESMP) which should be approved by the SPIU E&S team
- It is important that Supervision Consultants, Contractors and any other team engaged by the project make adequate security arrangements given that some of the project sites are at high-risk s as mentioned in the ESMP, where safety cannot be guaranteed such areas should be avoided. In addition, due to the security volatility in most parts of the country there should be some form of security guidance and intelligence prior to visit to any site. The SPIU should

engage a State Security Adviser and develop a robust Security Management Plan (SMP) in conjunction with the State Government and state security apparatus.

- The SPIU will need to implement the recommendations from the state-specific GBV Action plan which include timelines, budget and the specific parties which will be responsible for implementation and monitoring
- The GBV Mapping that was done for the state has a long list of 168 GBV Service providers, however, their capacities are not clearly highlighted. Thus, the SPIU will need to identify those with adequate capacities to support the project and sign a Memorandum of Understanding (MOU) with them which will include the coverage and quality of service required from them. The SPIU can engage the services of a GBV specialist to support the Gender/GBV officer to implement this action.
- In addition to training the teachers/staff in the selected schools for construction works, it is important for the SPIU supported by GBV experts to conduct sensitisation for project communities especially women, girls and community leaders/representatives on SEA/SH/GBV Prevention strategies and available response mechanism, owing to the fact that the contractor workers will likely interact in/with the communities, exchange of goods and services, employ local workers etc.
- The CBMC to be inaugurated across all locations will need to be trained on E&S compliance and monitoring, SEA/SH/GBV Prevention strategies and available response mechanism. The emphasis for such committees is usually on administration while E&S management is downplayed. A budget for this is included in the training plan.
- In many schools, it was observed that the Guidance Councillors (GCs) are male, even in some schools where there are more female students. Considering the project is proposing to embed the GCs as GBV focal persons in the project area, it is recommended to appoint females as GCs to create a safe space for female students/staff, or otherwise in such cases alternative arrangements can be made to appoint other people (qualified females) as the GBV focal person. The appointed GBV focal persons across all locations will need to be trained on SEA/SH/GBV prevention strategies and the available response mechanisms, service providers and referral pathway.

References

AGILE GRM Implementation Manual, 2021

Environmental and Social Screening Report for New Construction Works under Katsina AGILE, 2022

Environmental and Social Management Framework for AGILE, 2019

Environmental Impact Assessment (EIA) Act CAP E12 LFN 2004

GBV Assessment Report, 2019

Katsina Child Right Protection Policy, 2017

Katsina State Environmental Protection Laws
Katsina Social Protection Policy, 2020

Katsina State Waste Management Act

Labor Management Procedures for AGILE, 2019

National Environmental (Air Quality Control) Regulations, 2014

National Environmental (Construction Sector) Regulations (S.I No. 19), 2011

National Environmental (Noise Standards and Control) Regulations, 2009

National Policy on Occupational Safety and Health, revised 2020

National Environmental (Ozone Layer Protection) Regulations, (2009)

National Environmental (Sanitation and Wastes Control) Regulations (2009)

National Environmental (Surface water and Groundwater Quality Control) Regulations (2011)

National Policy on Education (NPE), 2013

Nigeria Labour Law (2004)

Project Implementation Manual for AGILE, 2021

Resettlement Policy Framework for AGILE, 2019

Stakeholders Engagement Plan for AGILE, 2019

World Bank Environmental and Social Framework, ESF, 2018

Annex 1 – Terms of Reference for Preparation of ESMP

Adolescent Girls' Initiative For Learning And Empowerment (AGILE) Project
Katsina State Ministry of Education
Terms of Reference for the Preparation Of An Environmental And Social Management Plan (ESMP) for Construction of New 90 JSS and 60 SSS

- **BACKGROUND**

Environmental and Social Management Plan (ESMP) will help to identify the environmental and social management and mitigation actions required to implement the project in each of the 100 sites accordance with the requirements of the International Development Association. ESMP shall be site specific as each site has it peculiar eco system and its sensitivity. The purpose of this Construction Environmental and Social Management Plan (ESMP) will be to provide a consolidated summary of all the Environmental and Social (E&S)2 commitments relevant for the construction phase of the Project. The measures focus on environmental (such as air emissions, biodiversity and environmental contamination) and social aspects (such as the protection of human rights, communication with local stakeholders, safety of workers and communities). This ESMP also gives an overview about the E&S Management System that is being implemented to ensure systematic and effective execution of these commitments, including roles and responsibilities between the PIA/Implementation Consultant and the Contractor. The ESMP can be updated as the Project proceeds through detailed design and construction to reflect the results of discussions with stakeholders and to include details of any other E&S developments

1. PROJECT DEVELOPMENT OBJECTIVE

The Project Development Objective (PDO) of AGILE aims to improve secondary education opportunities among girls, with particular attention to adolescent girls, in targeted areas in participating states. The project focuses on the human capital development for sustaining economic growth and poverty reduction through improvement in the quality and efficiency of social service delivery at the state level to promote social inclusion, strengthening governance, public sector management and gender equity.

2. PROGRAMME COMPONENTS

The AGILE Programme is structured into three components consisting 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

3. RATIONALE FOR THE ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Prior to implementation of civil works, there is need for the assessment of the environmental and social impacts of the sub-project interventions involving construction works. The Environmental and Social Management Plan (ESMP) will provide technical guidance for identification and management of the social and environmental risks and impact that will be associated with the proposed construction activities. The envisaged negative impacts will be site specific, reversible, and manageable through appropriate mitigation measures. The ESMP will be prepared in line with international good practice and the World Bank's Environmental and Social Framework requirements and take into consideration National Environmental legislation, as far as applicable. Due to the potential environmental and social risks and impacts associated with the AGILE project, the following Environmental and Social Standards applies: - ESS1: Assessment and Management of Environmental and Social Risks and Impacts; -

ESS2: Labour and Working Conditions: Potential environmental, social risks and impacts relevant to the project could emerge from contractor workers brought in for the construction of 90 junior and 60 senior secondary schools;
ESS3: Resource Efficiency and Pollution Prevention and Management;
ESS 4: Community Health and Safety;
ESS5: Land acquisition, Restriction of land use and Involuntary Resettlement; and
ESS10: Stakeholder Engagement and Information Disclosure

4. OBJECTIVES OF THE ASSIGNMENT

The objective of this assignment is to prepare an Environmental and Social Management Plan which should consist of a well-documented set of mitigation measures, monitoring, and institutional actions to be taken before and during sub-project implementation to eliminate adverse environmental and social impacts, offset or reduce them to acceptable levels. It should also include the measures required to implement these actions, addressing the adequacy of the monitoring and institutional arrangements in the intervention sites

- **BACKGROUND OF THE PROJECT AREA**

The project area is Katsina State, occupying about 23,939km2 with a population of 8, 252,366 (NPC, 2016), and is projected at 9,639,059 of the population (NPOPc 2020) the State consists of 34 Local Government Areas. The Education sector is headed by the State Ministry of Education, while SUBEB is responsible for Qualitative Basic Education. The challenges with respect to Girl child education in the state includes Access, Poverty, Early Marriage, and Infrastructure, cultural and religious misconceptions. AGILE intends to construct new 150 secondary schools (90 JSS &60 SSS) across the state

OBJECTIVES OF THE ESMP

The objective of this assignment is to prepare an Environmental and Social Management Plan which should consist of a well-documented set of mitigation measures, monitoring, and institutional actions to be taken before and during sub-project implementation to eliminate adverse environmental and social impacts, offset or reduce them to acceptable levels. It should also include the measures required to implement these actions, addressing the adequacy of the monitoring and institutional arrangements in the intervention site(s). The consultant is expected to prepare an environmental and social management plan (ESMP) for the above sub- projects listed in table1 which would detail the potential impacts associated with the proposed Construction works and set out mitigation measures required to mitigate any potential impacts in the project activities. The ESMP will be utilized by the contractor(s) to be commissioned by Katsina State AGILE in the preparation of the required Contractor's ESMP (C-ESMP). Which will form the basis of the site-specific management plan prior to works commencing. The ESMP will be used by the contractor to address all occupational health and safety (OHS) issues and community health and safety (CHS) issues associated with the proposed construction works The preparation of this ESMP is an obligation under the World Bank's Environmental and social standards requirements as outlined in the Project's ESMF. Generally, it is expected to provide guidance and recommendations for environmental and social safeguards as well as monitoring throughout the construction of the proposed project.

SCOPE OF WORKS

The scope of work for the consultancy service is to develop an environmental and social management plan that covers the identified sub-projects in table 1. The consultant will work in close collaboration with the Katsina SPIU environmental, social, GRM, GBV officers as well as the infrastructure engineers and other stakeholders as identified by the SPIU. In that respect the sequencing of the technical/feasibility studies and the ESMP will be critical. The consultant (firm) will have to receive the draft technical/feasibility studies in order to take into account the technical variants of the proposed activities

and also bring out clearly any major constraint that may arise due to the social and environmental situation on the ground for design consultant to consider while finalizing documents for construction

In each project site, the consultant (firm) will visit the schools. The consultant will take into account the proposed draft engineering designs, vegetative land management measures and other activities aimed at reducing or managing the project activities. The consultant will consider all the Environmental and Social Standards relevant to the AGILE project as highlighted above and selects the management strategies needed to ensure that environmental risks are appropriately mitigated. Tasks of the consultancy assignment include the following:

- Review the existing Project Appraisal Document (PAD), Environmental and Social Management Framework (ESMF), Environmental and Social Commitment Plan (ESCP) and Resettlement Policy Framework (RPF) prepared for the AGILE project.
- Review Environmental and Social Standards that are applicable to the AGILE Project.
- Review of preliminary engineering designs and technical /feasibility studies for the proposed project.
- Describe the existing status of the schools include schematic diagrams, maps, figures, tables and pictures.
- Describe the physical, biological, and social conditions in the study areas before project implementation. This analysis shall include the interrelations between environmental and social components and the importance that the society and local populations attach to these components, in order to identify the environmental and social components of high value or presenting a particular interest.
- Identify the policy, legal, administrative, institutional framework relevant to the sub-projects.
- Identify and summarize all anticipated significant adverse environmental and social impacts from the proposed activities; including the impacts of the proposed civil works/labour influx and associated impacts such as Sexual exploitation and abuse/sexual harassment (SEA/SH); Occupational Health and Safety; Community Health and Safety; Displacement and conflict/fragility; other broader social issues such as risk of elite capture; social exclusion of the most marginalized/vulnerable (e.g. persons with disabilities, IDPs, survivors of sexual violence); etc.
- Identify and summarize all occupational health and safety/ public health and safety issues at the sites
- Describe each mitigation measure to prevent, minimize, mitigate or compensate for adverse impacts or to enhance the project environmental and social benefits, including responsibilities and associated costs.
- Establish a method of monitoring and auditing environmental and social management practices during all phases of the activities inform the contractor bidding documents for the implementation
- Select and measure appropriate baseline indicators XII. Develop a plan for mitigating environmental and social risks associated with construction and operation of the sub-projects in consultation with the relevant public and government agencies; XIII. Define details of feasible and cost-effective measures that may reduce potentially significant adverse environmental and social impacts to acceptable levels;
- Develop a time-bound plan for mitigating environmental and social risks associated with the scope of works in consultation with the relevant public and government agencies;
- Identify monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed and the mitigation measures described above;

- Provide a specific description of institutional arrangements: the agencies responsible for carrying out the mitigation and monitoring measures (e.g for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and training) and the contractual arrangements for assuring the performance of each implementation agency;

- Define technical assistance programs that could strengthen environmental management capacity in the agencies responsible for implementation;

- Provide an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and

- Provide the expected capital and recurrent cost estimates and sources of funds for implementing the ESMP and inform accordingly the design consultants so that these costs are duly taken into consideration in the designs.

- Some socio-economic issues to be addressed in the ESMP:

  • A summary of the impacted communities for the project: location, access, population (number, demographic and social characteristics); economy (employment rate, income distribution); services (types, capacity, and adequacy) and housing. Concern is the ability to provide work force, service new development and absorb and adjust to growth (worker/family).

  • A summary of the views of the principals, students, teachers and other population including vulnerable groups, determined through documented discussions with local communities. These meetings and discussions must be documented and should show how issues and problems raised are or will be resolved (note that an Abbreviated Resettlement Action Plan (ARAP) could be developed for the Site, and this is covered under separate TORs).

  • Cultural: Summarize the possible effects of the project on historical/archaeological sites, heritage/artefacts, native religious or harvest sites of the affected communities and identification or development of mechanisms for handling chance findings.

XXI Carry out consultations with primary and secondary stakeholders in order to obtain their views about the project. These consultations shall occur during the preparation of the ESMP to identify key environmental and social issues and impacts, and after completion of the draft ESMP to obtain comments from stakeholders on the proposed mitigation/enhancement measures

XXII As appropriate, prepare an environmental hazard plan including an analysis of the risk of accident, the identification of appropriate security measures and the development of a preliminary contingency plan.

XXIII Develop a Labor Influx, Sexual Exploitation and Abuse, and Occupational Health and Safety Response Plan

XXIV ESMPs to capture the socio-economic, cultural and risk context for women, they should consider:

- Existing gender country diagnostics/country action plans;
- Data on partner/non-partner physical violence against women;
- Data and/or information on cultural practices vis-à-vis women (early marriage, physical practices);
- Existing services available from GBV Services Providers;
- Where health centres are located and what types of services are offered (e.g., whether they treat sexually transmitted diseases, provide reproductive health services, have supplies of rape kits including post-exposure prophylactics and emergency contraception, etc.);
- Whether women have easy access to these services, and if they have mobility and/or economic constraints that may impede access; and,
- Information obtained from consultations carried out in the preparation of the project. XXV. Prepare an Environmental and Social Management Plan (ESMP). The ESMP should capture:
- The potential environmental and social impacts resulting from project activities
- The proposed mitigation measures;
- The institutional responsibilities for implementation;
- The monitoring indicators;
- The institutional responsibilities for monitoring and implementation of mitigation measures;
- The costs of activities

3.0 CRITERIA FOR EXPERTISE QUALIFICATION

The consultant (firm) required for the preparation of the ESMP will have at least 7years experience in environmental and social management, Occupational Health and safety issues/public and must have an advanced degree earned in relevant fields including but not limited to environmental sciences, or the social sciences. The consultant(s) must have on his team a Baseline data specialists, social scientists, environmental analysts, OHS Specialist and stakeholder consultation expert. The consultant(s) must have a working knowledge of World Bank Environmental and Social Framework, Operational safeguards policies gained through hands-on experience in the preparation and implementation of environmental and social management plans in an urban/rural areas

Annex 2 – Socio-Economic Assessment Instruments

SPECIMEN QUESTIONNAIRE ON SOCIO ECONOMIC CHARACTERISTICS OF SETTLEMENT(S)

SECTION A:

- Project Name……..
- Date……..
- Name of community……..
- Name of local government Area……
- State……..
- Name of major community Association……..
- Names of Executive members of the Association……
- Functions of Association……..

SECTION B:

HISTORY, TRADITIONAL AND ADMINISTRATIVE STRUCTURE OF COMMUNITY/GROUPS OF COMMUNITIES

9. Is the village part of a clan? Yes/No.
   Name of clan, if yes……
10. Name the ethnic group(s) that founded the village……..
11. When was the village founded?.....
12. Who is the overall/highest traditional and administrative ruler of the community……

- Where does he reside?.....
- Traditional chiefs of the village/group of villages in order of hierarchy. Provide titles, names and ranks.

15. Is there a council of chiefs? Yes /No.
16. State functions of the council of chiefs
17. Is there an executive council? Yes /No
18. Is there a village head? Yes/No
    Name……
    Title……..

SECTION C:

CULTURE, RELIGION AND ARCHAEOLOGY

20. Name of shrine/deity Worshipped in the community……..
21. Name of sacred forest and their locations. ……..
22. Religious and social festivals celebrated by the community. ……
23. Name the forest reserve(s) within or near the community……
24. Name lakes……
25. Name rivers……..
26. Name sites of archaeological interest e.g for digging ground to study culture of the area……..
27. Name social clubs in community……..

- Name community based improvement schemes/organizations including community bank or monthly contributions paid per household……
- Give estimate of religious worshippers in community.

SECTION D: DEMOGRAPHY

- Give estimate of:

1. village population

males……..females……children……..total……

2. Ethnic population of the community……

- major crops farmed in community……..
- Major livestock bred in community……..
- List the different occupation/employment profile of community and income. What is the percentage/ number of the unemployed in community?.....

SECTION E: INDUSTRIES PRESENT

- Name companies/industries present in the area. ……
- Names and location/addresses of estates present in the area……..
- Names and addresses/location of hotels and guest houses present within or near the community……..
- Name of bank(s) in or near the community……..

SECTION F: EDUCATION

- Names, addresses and ownership of educational institutions in the area.
- Give estimate of literacy level in the community for primary, secondary and tertiary levels……..

SECTION G: INFRASTRUCTURE PROVISION

- Names and ownership of health facilities in the community……..
- What are the main health problems? Give % of total population. E.g Aids/HIV, chicken pox, diarrhea, Malaria, leprosy, meningitis, diabetes, pneumonia, skin infection, asthma, pregnancy related, hepatitis, guinea worm infection, round worm infection etc
- give approximate % of toilet facilities used in community: viz

a. pit toilet …… b. bush ……. c. water closet (wc)
d. river. ……

43. What is the general form of houses for people to live in.
    * ownership of dwelling: give % of total

i. owned by occupier……
ii. Rented……..
iii. Supplied free by employer……..

44. What is the method of disposal of solid wastes/ garbage?.....

- Water supply sources……
- Roads and drainage……..
- Electricity supply……..
- Fuel used by households……..

SECTION H: ENVIRONMENTAL IMPACT

- State how the project will affect your community……..
- State major environmental problems of the area……

Annex 3 – Pictures of Consultations and Attendance Sheets

Consultation with Women

Consultation with Female Teacher

Consultations with some students living with disabilities

Consultation with students

Cross-section of stakeholders | Consultation with students with disabilities | Cross-section with NSCDC, Katsina State Command

Cross-section of stakeholders | Consultation with female

KATSINA STATE AGILE PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR NEW CONSTRUCTION OF JSS AND SSS

ATTENDANCE SHEET FOR CONSULTATIONS

DATE:

NAME	MINISTRY	DESIGNATION	CONTACT	SIGNATURE
Dr Badamasi Lawal	MOE	Hon Comm	0703	
2. Musa Abdu Dankama	MOE	P.S (Educ)	0803	
3 NAKAD IDRIS LAWAL	MOE	SA(PROJECTS)	0803	
4 Maina Mohammed Othman	MOE	DJSS	08035	
5. TANIMU M. RUNKA	JSB	PM.	080[illegible]	
6 Sani Danjuma Gulumen	SMOE	P.R.O	0806	
7. USMAN IBRAHIM	AGILE, PIU/SMOE	Communication Officer	0706	
8 BILKISU BABBA KATA	SMOE KATSINA	DQA	0806	
9 MUHAMMAD SANI YAHAYA	AGILE PIU/MOE	Admin Officer	0803	
10. UMAR FARALI	SMOE	[illegible]	[illegible]	
BILKISU ISAH	MOWIA	WPO	08133112564	
MUNTARI KABU	Environment	Director	08037616374	

Annex 4 – General Environmental Management Conditions for Construction Contracts

General

1. In addition to these general conditions, the Contractor shall comply with any specific Environmental Management Plan (EMP) or Environmental and Social Management Plan (ESMP) for the works he is responsible for. The Contractor shall inform himself about such an EMP, and prepare his work strategy and plan to fully take into account relevant provisions of that EMP. If the Contractor fails to implement the approved EMP after written instruction by the Supervising Engineer (SE) to fulfil his obligation within the requested time, the Owner reserves the right to arrange through the SE for execution of the missing action by a third party on account of the Contractor.

2. Notwithstanding the Contractor's obligation under the above clause, the Contractor shall implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental performance requirements specified in an EMP. In general these measures shall include but not be limited to:

(a) Minimize the effect of dust on the surrounding environment resulting from earth mixing sites, asphalt mixing sites, dispersing coal ashes, vibrating equipment, temporary access roads, etc. to ensure safety, health and the protection of workers and communities living in the vicinity dust producing activities.

(b) Ensure that noise levels emanating from machinery, vehicles and noisy construction activities (e.g. excavation, blasting) are kept at a minimum for the safety, health and protection of workers within the vicinity of high noise levels and nearby communities.

(c) Ensure that existing water flow regimes in rivers, streams and other natural or irrigation channels is maintained and/or re-established where they are disrupted due to works being carried out.

(d) Prevent bitumen, oils, lubricants and wastewater used or produced during the execution of works from entering into rivers, streams, irrigation channels and other natural water bodies/reservoirs, and also ensure that stagnant water in uncovered borrow pits is treated in the best way to avoid creating possible breeding grounds for mosquitoes.

(e) Prevent and minimize the impacts of quarrying, earth borrowing, piling and building of temporary construction camps and access roads on the biophysical environment including protected areas and arable lands; local communities and their settlements. In as much as possible restore/rehabilitate all sites to acceptable standards.

(f) Upon discovery of ancient heritage, relics or anything that might or believed to be of archaeological or historical importance during the execution of works, immediately report such findings to the SE so that the appropriate authorities may be expeditiously contacted for fulfilment of the measures aimed at protecting such historical or archaeological resources.

(g) Discourage construction workers from engaging in the exploitation of natural resources such as hunting, fishing, collection of forest products or any other activity that might have a negative impact on the social and economic welfare of the local communities.

(h) Implement soil erosion control measures in order to avoid surface run off and prevents siltation, etc.(i) Ensure that garbage, sanitation and drinking water facilities are provided in construction workers camps.

(j) Ensure that, in as much as possible, local materials are used to avoid importation of foreign material and long distance transportation.

(k) Ensure public safety and meet traffic safety requirements for the operation of work to avoid accidents.

3. The Contractor shall indicate the period within which he/she shall maintain status on site after completion of civil works to ensure that significant adverse impacts arising from such works have been appropriately addressed.

4. The Contractor shall adhere to the proposed activity implementation schedule and the monitoring plan / strategy to ensure effective feedback of monitoring information to project management so that impact

management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.

5. Besides the regular inspection of the sites by the SE for adherence to the contract conditions and specifications, the Owner may appoint an Inspector to oversee the compliance with these environmental conditions and any proposed mitigation measures. State environmental authorities may carry out similar inspection duties. In all cases, as directed by the SE, the Contractor shall comply with directives from such inspectors to implement measures required to ensure the adequacy rehabilitation measures carried out on the bio-physical environment and compensation for socio-economic disruption resulting from implementation of any works.

Worksite/Campsite Waste Management

6. All vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be bunded in order to contain spillage. All waste containers, litter and any other waste generated during the construction shall be collected and disposed of at designated disposal sites in line with applicable government waste management regulations.

7. All drainage and effluent from storage areas, workshops and camp sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations.

8. Used oil from maintenance shall be collected and disposed of appropriately at designated sites or be re-used or sold for re-use locally.

9. Entry of runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution.

10. Construction waste shall not be left in stockpiles along the road but removed and reused or disposed of on a daily basis.

11. If disposal sites for clean spoil are necessary, they shall be located in areas, approved by the SE, of low land use value and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low-lying areas and should be compacted and planted with species indigenous to the locality.

Material Excavation and Deposit

12. The Contractor shall obtain appropriate licenses/permits from relevant authorities to operate quarries or borrow areas.

13. The location of quarries and borrow areas shall be subject to approval by relevant local and national authorities, including traditional authorities if the land on which the quarry or borrow areas fall in traditional land.

14. New extraction sites:

a) Shall not be located in the vicinity of settlement areas, cultural sites, wetlands or any other valued ecosystem component, or on on high or steep ground or in areas of high scenic value and shall not be located less than 1km from such areas.

b) Shall not be located adjacent to stream channels wherever possible to avoid siltation of river channels. Where they are located near water sources, borrow pits and perimeter drains shall surround quarry sites.

c) Shall not be located in archaeological areas. Excavations in the vicinity of such areas shall proceed with great care and shall be done in the presence of government authorities having a mandate for their protection.

d) Shall not be located in forest reserves. However, where there are no other alternatives, permission shall be obtained from the appropriate authorities and an environmental impact study shall be conducted.

e) Shall be easily rehabilitated. Areas with minimal vegetation cover such as flat and bare ground, or areas covered with grass only or covered with shrubs less than 1.5m in height, are preferred.

f) Shall have clearly demarcated and marked boundaries to minimize vegetation clearing.

15. Vegetation clearing shall be restricted to the area required for safe operation of construction work. Vegetation clearing shall not be done more than two months in advance of operations.

16. Stockpile areas shall be located in areas where trees can act as buffers to prevent dust pollution. Perimeter drains shall be built around stockpile areas. Sediment and other pollutant traps shall be located at drainage exits from workings.

17. The Contractor shall deposit any excess material in accordance with the principles of the general conditions, and any applicable EMP, in areas approved by local authorities and/or the SE.

18. Areas for depositing hazardous materials such as contaminated liquid and solid materials shall be approved by the SE and appropriate local and/or national authorities before the commencement of work. Use of existing, approved sites shall be preferred over the establishment of new sites.

Rehabilitation and Soil Erosion Prevention

19. To the extent practicable, the Contractor shall rehabilitate the site progressively so that the rate of rehabilitation is similar to the rate of construction.

20. Always remove and retain topsoil for subsequent rehabilitation. Soils shall not be stripped when they are wet as this can lead to soil compaction and loss of structure.

21. Topsoil shall not be stored in large heaps. Low mounds of no more than 1 to 2m high are recommended.

22. Re-vegetate stockpiles to protect the soil from erosion, discourage weeds and maintain an active population of beneficial soil microbes.

23. Locate stockpiles where they will not be disturbed by future construction activities.

24. To the extent practicable, reinstate natural drainage patterns where they have been altered or impaired.

25. Remove toxic materials and dispose of them in designated sites. Backfill excavated areas with soils or overburden that is free of foreign material that could pollute groundwater and soil.

26. Identify potentially toxic overburden and screen with suitable material to prevent mobilization of toxins.
27. Ensure reshaped land is formed so as to be inherently stable, adequately drained and suitable for the desired long-term land use, and allow natural regeneration of vegetation.
28. Minimize the long-term visual impact by creating landforms that are compatible with the adjacent landscape.
29. Minimize erosion by wind and water both during and after the process of reinstatement.
30. Compacted surfaces shall be deep ripped to relieve compaction unless subsurface conditions dictate otherwise.
31. Revegetate with plant species that will control erosion, provide vegetative diversity and, through succession, contribute to a resilient ecosystem. The choice of plant species for rehabilitation shall be done in consultation with local research institutions, forest department and the local people.

Water Resources Management

32. The Contractor shall at all costs avoid conflicting with water demands of local communities.
33. Abstraction of both surface and underground water shall only be done with the consultation of the local community and after obtaining a permit from the relevant Water Authority.
34. Abstraction of water from wetlands shall be avoided. Where necessary, authority has to be obtained from relevant authorities.
35. Temporary damming of streams and rivers shall be done in such a way avoids disrupting water supplies to communities downstream and maintains the ecological balance of the river system.
36. No construction water containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural water drainage courses.
37. Wash water from washing out of equipment shall not be discharged into water courses or road drains.
38. Site spoils and temporary stockpiles shall be located away from the drainage system, and surface run off shall be directed away from stockpiles to prevent erosion.

Traffic Management

39. Location of access roads/detours shall be done in consultation with the local community especially in important or sensitive environments. Access roads shall not traverse wetland areas.
40. Upon the completion of civil works, all access roads shall be ripped and rehabilitated.
41. Access roads shall be sprinkled with water at least five times a day in settled areas, and three times in unsettled areas, to suppress dust emissions.

Blasting

42. Blasting activities shall not take place less than 2km from settlement areas, cultural sites, or wetlands without the permission of the SE.
43. Blasting activities shall be done during working hours, and local communities shall be consulted on the proposed blasting times.
44. Noise levels reaching the communities from blasting activities shall not exceed 90 decibels.

Disposal of Unusable Elements

45. Unusable materials and construction elements such as electro-mechanical equipment, pipes, accessories and demolished structures will be disposed of in a manner approved by the SE. The Contractor has to agree with the SE which elements are to be surrendered to the Client's premises, which will be recycled or reused, and which will be disposed of at approved landfill sites.
46. As far as possible, abandoned pipelines shall remain in place. Where for any reason no alternative alignment for the new pipeline is possible, the old pipes shall be safely removed and stored at a safe place to be agreed upon with the SE and the local authorities concerned.
47. AC-pipes as well as broken parts thereof have to be treated as hazardous material and disposed of as specified above.
48. Unsuitable and demolished elements shall be dismantled to a size fitting on ordinary trucks for transport.

Health and Safety

49. In advance of the construction work, the Contractor shall mount an awareness and hygiene campaign. Workers and local residents shall be sensitized on health risks particularly of AIDS.
50. Adequate road signs to warn pedestrians and motorists of construction activities, diversions, etc. shall be provided at appropriate points.
51. Construction vehicles shall not exceed maximum speed limit of 40km per hour.

Repair of Private Property

52. Should the Contractor, deliberately or accidentally, damage private property, he shall repair the property to the owner's satisfaction and at his own cost. For each repair, the Contractor shall obtain from the owner a certificate that the damage has been made good satisfactorily in order to indemnify the Client from subsequent claims.
53. In cases where compensation for inconveniences, damage of crops etc. are claimed by the owner, the Client has to be informed by the Contractor through the SE. This compensation is in general settled under the responsibility of the Client before signing the Contract. In unforeseeable cases, the respective administrative entities of the Client will take care of compensation.

Contractor's Environment, Health and Safety Management Plan (EHS-MP)

54. Within 6 weeks of signing the Contract, the Contractor shall prepare an EHS-MP to ensure the adequate management of the health, safety, environmental and social aspects of the works, including implementation of the requirements of these general conditions and any specific requirements of an EMP for the works. The Contractor's EHS-MP will serve two main purposes:

- For the Contractor, for internal purposes, to ensure that all measures are in place for adequate EHS management, and as an operational manual for his staff.
- For the Client, supported where necessary by a SE, to ensure that the Contractor is fully prepared for the adequate management of the EHS aspects of the project, and as a basis for monitoring of the Contractor's EHS performance.

55. The Contractor's EHS-MP shall provide at least:

- a description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in an EMP;
- a description of specific mitigation measures that will be implemented in order to minimize adverse impacts;
- a description of all planned monitoring activities (e.g. sediment discharges from borrow areas) and the reporting thereof; and
- the internal organizational, management and reporting mechanisms put in place for such.

56. The Contractor's EHS-MP will be reviewed and approved by the Client before start of the works. This review should demonstrate if the Contractor's EHS-MP covers all of the identified impacts and has defined appropriate measures to counteract any potential impacts.

EHS Reporting

57. The Contractor shall prepare bi-weekly progress reports to the SE on compliance with these general conditions, the project EMP if any, and his own EHS-MP. An example format for a Contractor EHS report is portrayed below. It is expected that the Contractor's reports will include information on:

- EHS management actions/measures taken, including approvals sought from local or national authorities;
- Problems encountered in relation to EHS aspects (incidents, including delays, cost consequences, etc. as a result thereof);
- Lack of compliance with contract requirements on the part of the Contractor;
- Changes of assumptions, conditions, measures, designs and actual works in relation to EHS aspects; and
- Observations, concerns raised and/or decisions taken with regard to EHS management during site meetings.

58. It is advisable that reporting of significant EHS incidents be done "as soon as practicable". Such incident reporting shall therefore be done individually. Also, it is advisable that the Contractor keep his own records on health, safety and welfare of persons, and damage to property. It is advisable to include such records, as well as copies of incident reports, as appendixes to the bi-weekly reports. A sample format for an incident notification is shown below. Details of EHS performance will be reported to the Client through the SE's reports to the Client.

Training of Contractor's Personnel

59. The Contractor shall provide sufficient training to his own personnel to ensure that they are all aware of the relevant aspects of these general conditions, any project EMP, and his own EHS-MP, and are able to fulfil their expected roles and functions. Specific training should be provided to those employees that have particular responsibilities associated with the implementation of the EHS-MP. General topics should be:

- EHS in general (working procedures);
- emergency procedures; and
- social and cultural aspects (awareness raising on social issues).

Cost of Compliance

60. It is expected that compliance with these conditions is already part of standard good workmanship and state of art as generally required under this Contract. The item "Compliance with Environmental Management Conditions" in the Bill of Quantities covers this cost. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable EHS impact.

3. Example Format: EHS Report

Contract: Period of reporting:

EHS management actions/measures:

Summarize EHS management actions/measures taken during period of reporting, including planning and management activities (e.g. risk and impact assessments), EHS training, specific design and work measures taken, etc.

EHS incidents:

Report on any problems encountered in relation to EHS aspects, including its consequences (delays, costs) and corrective measures taken. Include relevant incident reports.

EHS compliance:

Report on compliance with Contract EHS conditions, including any cases of non-compliance.

Changes:

Report on any changes of assumptions, conditions, measures, designs and actual works in relation to EHS aspects.

Concerns and observations:
Report on any observations, concerns raised and/or decisions taken with regard to EHS management during site meetings and visits.

Signature (Name, Title Date):

Contractor Representative

INCIDENT / ACCIDENT REPORTING TEMPLATE

IDENTIFICATION -INCIDENT / ACCIDENT			
Project name and Id:			
Name and Id of site:			
Name of Contractor on site			
Name of Supervision Consultant			
Event type -Incident / Accident #:			
Date:		Hour:	
Place of occurrence:		Person (s) affected	
LGA:			
Communities:			
Incident / accident Information Source:			
INCIDENT / ACCIDENT DESCRIPTION			
Event Severity Level	**Injuries**	**Fatality**	How the event relates to the Project
☐ Indicative	☐head	☐ Equipment failure related	☐ Linked with the project
☐ Serious	☐ Body	☐ Chemical Related	☐ Not linked with the project
☐ Severe	☐ Limb	☐ Car/driving related	
	☐ Eyes	☐ Fall from height	
	☐Other *(explain)*	☐ Gun shot/ Kidnap/Banditry	
Scope of the Incident / Accident			
☐Environmental	☐ Social	☐Occupational Health and Safety	
Detailed Description of the Incident / Accident Event			
RESPONSE ACTIONS FOR THE INCIDENT / ACCIDENT			
Status of resolution:		**Field Response Urgency:**	
☐Resolved		☐ Need for immediate response	
☐In progress		☐ No immediate response	
☐Other (explain)			
Description of Response to Event - Incident / Accident			
Recurrence of Similar Events / Incidents / Accidents			
☐No	☐ Yes	Number of times ___	
In case of recurrence, indicate the period in which the events were repeated:			
IMPACT ON THE PROJECT			
Does the event affect the execution of the work?		Is there a need for additional specialized resources to investigate, evaluate, or resolve the event?	
☐Yes		☐Yes	
☒NO		☐No	
		☐Other *(Explain)*	
Other observations			

	Environmental Safeguards Officer	Social Safeguards Officer
Name		
Signature		
Date (dd-mm-yyyy)		

N.B Please integrate or attach the following information, if applicable.

Special details

- Date
- Time
- Atmospheric conditions/visibility
- State of the road
- Precise location, including GPS coordinates, of the incident (including incidental archaeological finds)

Persons concerned

- Name(s)
- Age(s)
- Experience
- Date of entry into the company
- Last medical check-up
- Current medical treatment
- Evidence of substance abuse / alcoholism
- Last safety meeting in which the person(s) attended
- History of offences/incidents

Appendices

- Photos
- Testimonials

Description of corrective or mitigating measures implemented

Police report on the causes of the incident/accident (Root Cause Analysis)

Annex 5 – Waste Management Plan

The categories of waste envisaged under the sub-project is as follows:

Vegetal waste – This will be vegetation cleared during site preparation. However, vegetal waste is expected to be minimal considering most of the schools are already existing.

Construction waste – This will include concrete including cement, stones, gravels, wood, metal scraps, etc.

Gaseous emissions – from movement of vehicles, machine operations, site clearing activities, mixing of materials and chemicals such as paints

Liquid waste - Leakages from vehicles, oil containers, chemicals, adhesives, etc.

Human Waste – from workers onsite, campsite such as domestic sewage, faeces, urine

Table 25 below shows how this waste generated will be managed.

Table 25: Categories of Waste

S/N	Potential Source	Waste Type	Waste Streams	Management
A	**PRECONSTRUCTION**			
1	Movement of vehicles on unpaved surface and engine exhaust	Emission	COx, SOx, NOx, CO, Dust	• Use water suppression to prevent dust emission • Maintain vehicles and machineries to reduce emission • Maintain low speed to reduce dust and gaseous emission
2	Site Clearing and Installation of temporary workers camp and offices and workshops	Non-Hazardous	• Vegetal Waste • Industrial Waste: Metal scraps, packaging waste	• Vegetal waste shall be supplied to farmers for use as compost. • Woody vegetal shall be supplied to host communities for domestic uses including as fuel wood for cooking. • Segregated and stored on site to be collected at least once a week for reuse or recycle through the Katsina Environmental Protection Agency (KTSEPA) or licensed third party facilities.
3	Workers' camp	Domestic and Human waste	• Food remnant, kitchen wastes. Food packaging etc • Domestic Sewage	• To be transferred to locals for use as compost and animal feed. • Plastic and other packaging to be recycled through licensed recycling third parties or collected by SEPA • Sewage will be collected in a properly closed constructed septic tank and will be evacuated in conjunction with SEPA at least twice during the 18month period or as required.
B	**CONSTRUCTION**			
1	Movement of vehicles on unpaved surface and engine exhaust	Emission	COx, SOx, NOx, CO, Dust	• Use water suppression to prevent dust emission • Maintain vehicles and machineries to reduce emission • Maintain low speed to reduce dust and gaseous emission • Use of cleaner technologies and modern equipment
2	Civil works	Non-Hazardous	• Spoils/demolition • Waste Packaging and Dunnage such as scrap wood, scrap metal,	• Segregated and kept securely in closed containers on site. To be evacuated by KTSEPA or transferred to approved

	Workers' camp/offices	/Industrial	steel, glass, plastic, paper and cardboard, empty metal containers, excess concrete, broken equipment, or components • Domestic-type waste: wastepaper and food scraps, metal cans	recycling third parties for reuse/recycling. • Non-recyclables to be removed by KTSEPA or other approved waste contractor by the state • To be transferred to locals for use as compost and animal feed. • Plastic and other packaging to be evacuated by KTSEPA or recycled through licensed recycling third parties.
3	Civil Works	Hazardous Waste	**Solid Wastes:** used batteries, chemical containers, concrete etc **Liquid Waste:** spent lubricating oils, hydraulic fluids, brake fluids, battery electrolyte, and dielectric fluids, chemical cleaning agents, paints, primers, thinners, and corrosion control coatings; sealants and adhesives etc	Store on site in closed and labelled containers with secondary containment to be evacuated by KTSEPA or registered waste contractor with off-site permitted hazardous waste treatment, storage, or disposal facilities in accordance with KTSEPA policies
	Civil works	Waste Water	Wastewater from equipment washing and concrete production	Discharged to the ground as only very small quantity is envisaged at this stage.
	Civil works	Electrical and electronic waste (e-waste)	Electrical wirings, cables, damaged computers etc.	This will be sent to Material Recovery Facilities/ recycling facilities in the state for proper management. DanUsi Ventures in Batagarawa, Katsina, Usman Trading Service, Lawrence Onoja Road in Katsina, SaifZee Global Enterprise, Jibia LGA, Katsina.
C	**OPERATION**			
1	Movement of vehicles	Emission	COx, SOx, NOx, CO, Dust	See A1
2	Operations	Solid waste Chemical waste Sewage E-waste	Maintenance of buildings, roofing sheets, iron sheets, paint. Sewage evacuation from constructed toilets	Segregated and kept securely in closed containers on site to be collected by KTSEPA. Non-recyclable solid waste to be sent to approved KTSEPA dumpsites. Recyclable waste to be sent to MRF facilities and recycling facilities, this will be done in liaison with KTSEPA. Some of which include scrap metal recyclers (Hannun Kira Enterprises) in Lambun Sarki Kofar Marusa, DanUsi Ventures in Batagarawa, Katsina, Usman Trading Service, Lawrence Onoja Road in Katsina, Bazama Scrap Metal Enterprises in Dutsin Safe, SaifZee Global Enterprise, Jibia LGA, Katsina, Dana Steel Rolling Company, Shehu Yar'ardua way Katsina. Liaise with WASH departments at the LGA and other WASH projects like SURWASH ON Sewage management and WASH facilities
Cost (Also captured the relevant section of ESMP Matrix Table)				

Annex 6 – Occupational Health and Safety Plan

Every project poses its own HSE risks. This plan is developed to meet up with OHS standards and to achieve the objectives set for the project. The project team shall undertake to ensure high performance standards and conformity with contract requirements by managing the works in a systematic and thorough manner.

- ***Competency***

  All personnel required to operate or work with any equipment or machine must be competent, be tested for each equipment that he/she shall be operating. All personnel who as part of their profession require licensing or certification must obtain the necessary certification before he/she shall be allowed to work on the site.

- ***Fitness***

  All personnel working on site shall be required to be certified medically fit to do so by an approved medical facility or Medical Doctor (pre-employment medical examination)

- ***HSE Training***

  1. Induction/Orientation

  Every new or rehired employee and Subcontractors employees must undergo mandatory OHS orientation / induction. The purpose of the Induction is to educate workers and make them aware of the major potential hazards he or she shall come into contact with while working on the site; also, it is one more opportunity to stress the importance of HSE being the first priority in the operations.

  The content of the HSE orientation / induction shall cover the following subjects:

  - Site safety rules.
  - Personnel protective equipment requirements (PPE).
  - Environmental sensitivity and protection.
  - Preparation and planning of the job (Daily Pre-task talk).
  - Emergency plan and muster points.
  - SEA/SH and GBV prevention strategies
  - COVID-19 prevention strategies

  1. Project Specific HSE Training

  In addition to the HSE orientation /induction, there shall be specific site HSE trainings which shall cover the following topics:

  - Manual handling.
  - Electrical Safety
  - Emergency Prevention, Preparedness and Response
  - Work at height training
  - First Aid training (for site First Aiders)
  - Lifting and Rigging
  - Safe Driving techniques (for drivers)

EMERGENCY PREPAREDNESS AND RESPONSE

Emergency procedures and evacuation plan shall be developed by the HSE Department and displayed on the notice board. These procedures shall be communicated to all staff. Also, each section/department shall have at least a trained first aider at all times.

The contractor team should have a trained first-aider present at all times with well-equipped first aid box. For accidents which are beyond first aid/require medical attention, ill-health, disease outbreaks, health emergencies the contractor to liaise with the Primary Healthcare Centres present in each Ward and registered hospitals in the project areas to ensure timely medical attention (list of health facilities - https://hfr.health.gov.ng/facilities/hospitals-list?page=1055). The emergency numbers for the Katsina State Ministry of health can be contacted as well: 09035037114, 09047092428.

- **HSE IMPLEMENTATION AND PERFORMANCE MONITORING**

1. HSE Meetings

HSE management meetings shall be held once a month. The meeting is to help identify safety problems, develop solutions, review incident reports, provide training and evaluate the effectiveness of our safety program. Some of the meetings shall be:

- Project/Site Management HSE Meeting for management and supervision (Monthly).
- Tool box talk meetings for all workforce (Weekly).
- Pre-task briefing for all workforces (Daily).
- Special situation meeting (As required).

1. HSE Reporting

All incidents and illnesses must be reported to site supervisor after which investigation shall commence and recorded so that appropriate corrective actions shall be implemented to prevent any re-occurrence and report findings shall be forwarded to management for review. Reporting requirements shall include notification of incident, investigation report, and monthly report. Notification of Incident form shall be developed which shall be filled and submitted to HSE department for investigation.

- **HSE Inspection and Audits**

For continual improvement of HSE management system, HSE inspection and audit shall be conducted. An inspection checklist shall be developed. This is to ensure that the HSE management system is being adhered to. The inspection shall be conducted by the HSE department together with site management.

Corrective and Preventive Actions and Non Conformities

During the cause of inspections, concerns raised shall be addressed and closed out. It is expected that in a period of two weeks, a close out inspection shall take place to verify that the corrective actions have been closed.

Project HSE Rules

The project HSE rules shall be developed and supervision shall develop specific rules and procedures when necessary.

The following site rules shall be implemented at all times. The Site Manager shall draw these rules to the attention of their own workmen or staff. All sub-contractors must ensure that these rules are drawn to the attention of their workmen and staff.

The Principal Contractor may implement additional site rules during the contract programme. Any such additional rules shall be notified to all personnel engaged on the project prior to their implementation. The HSE rules shall include but not limited to:

- Personal Protective Equipment must be worn at all times.
- All instructions issued by the Site Manager regarding the storage, handling or cleaning of materials, plant and equipment must be followed.
- All vehicles must be parked in the designated areas.
- Any workman suffering from a medical condition that might affect his work and/or that could require specific Medical treatment must inform the supervisor before commencing work.
- All site tools shall either be battery operated or 110 volts.
- No one shall be permitted on site if it is believed that they are under the influence of alcohol or drugs.
- Vehicles must not reverse without a banksman in attendance.
- All visitors to site must undergo a site-specific induction and operative Identity badges must be worn at all times.
- All excavations must be secured.
- Smoking and eating shall only be permitted in the designated area. This area shall be identified during induction.
- No hot works operations are permitted without a hot work permit in place.
- There shall be no radios or other music playing devices on site.

- Good housekeeping practices to be adopted**.**
- Compliance with all Ethical Power Permit to Work systems
- The site keyed access procedure must be strictly adhered to.
- All Contractors must comply with Site Health & Safety Guidelines / Site Safety Method Statement
- No untrained worker shall be permitted to operate heavy machineries.
- COVID-19 protocols to be adhered to including frequent handwashing, use of nose masks when in crowded spaces, timely reporting of any symptoms to HSE officer and immediate isolation
- **Safe Work Practices/Personal Protective Equipment (PPE)**

  The basic PPE required for the project shall be Safety Glasses, Safety Boots, Hand Gloves, Hard Hat, ear plugs and Coverall. Any other PPE shall be used as applicable. Management is responsible for the provision of PPE and usage shall be enforced at all time.
  PPE shall be provided in circumstances where exposure to hazards cannot be avoided by other means or to supplement existing control measures identified by a risk assessment. An assessment shall be made to ensure that the PPE is suitable for purpose and is appropriate to the risk involved.

  Information, instruction & training shall be given to all employees on safe use, maintenance and storage of PPE. Employees shall, in accordance with instructions given, make full use of all PPE provided and maintain it in a serviceable condition and report its loss or defect immediately to the maintenance department where it shall be replaced.

  PPE shall be replaced when it is no longer serviceable and returned on a new for old basis. Employees shall sign to state that they have received PPE when issued.
- **Welfare Facilities**

  The provision of welfare facilities on the site shall be communicated to all operatives at site induction.

  A cleaning regime shall be implemented and maintained for the duration of the construction phase to ensure the site welfare facilities remain in a clean and tidy condition.
  If mains drinking water becomes unavailable during the construction phase bottled water shall be brought to site for all operatives for the necessary period.
- **Signage**

  Adequate provision for warning and directional signs shall be made.

Annex 7 – Traffic Management Plan

The objective of this TMP is to provide safe passage for community members, pedestrians, motorcyclist, cyclists and vehicular traffic in the project areas during the construction.
The Contractor should designate a TMP Supervisor who will oversee traffic management along major roads within the project corridors.
The following are the minimum requirements for traffic management on the project:

- **Design and layout of Road Systems**

The contractor in conjunction with the community, SPIU and FRSC must: -

a) Plan traffic routes to give the safest route between places within the project route
b) Make traffic routes wide enough for safe movement of the largest vehicle using them.
c) Ensure all drops and falls are adequately protected.
d) Avoid traffic routes passing close to vulnerable areas such as fuel tanks.
e) Ensure there are designated safe areas for loading, unloading and plant maintenance.
f) Avoid sharp corners or blind bends, if these cannot be avoided install mirrors.
g) Road crossings and junctions, should be clearly signed and marked.
h) Make entrances and gates wide enough.
i) Set speed limits and clearly mark on traffic routes; (5mph).
j) Give prominent warning of limited headroom and overhead cables.

- Liaisons with Government Traffic Agencies

The TMP will ensure liaisons with the FRSC at the State level. In situations where heavy traffic impacts are envisaged, the Contractor will liaise with the FRSC to ensure traffic coordination and mitigate adverse traffic impacts.

- **Pedestrians**

a) Provide separate routes for pedestrians and where needed provide suitable barriers.
b) If traffic routes are used by both pedestrians and vehicles they should be wide enough.
c) Provide suitable well marked crossing points.

S/N	Aspects	Descriptions	Responsible Party
1	Traffic/Safety Signage	• Safety signage should be put at strategic locations to warn road users of the ongoing construction activities. • Signages should also be located along borrow pits, engineering yards and workers' camp.	Contractor
2	Movement of Vehicles and Equipment	• Mobilization of equipment and materials should be done at off-peak period (10am – 4pm), mainly on weekends, holidays • Enforce speed limit. • Ensure vehicles and equipment are parked at Camp site and designated areas ONLY. • Untarred access roads shall be sprinkled with water frequently to suppress dust emissions. • The contractor must ensure that trucks carrying sand/soil to and from the sites are well covered in order not to cause injury to the public. • Station flagmen at junctions, diversion points, near public crossings such as schools and speed bumps will be installed in built up areas and near public facilities such as schools, mosques, churches to reduce speed and dust • During peak periods, such as market days FRSC will also be involved in assisting traffic and road safety management. Furthermore, the contractor will engage the services of FRSC to train all project drivers.	Contractor
3	Training	• Hire drivers with appropriate driver's license. • Liaise with FRSC to train drivers • As part of refresher course for construction workers, train drivers on defensive driving and enforce speed limits	Contractor

4	Communication	• All Traffic and Safety signages should be boldly written in English & local languages. • Any incident/ accidents should be reported immediately to the SPIU within 24hrs. The SPIU will also report to the NPCU/WB within 48hrs including immediate action taken	Contractor SPIU Contractor
	Cost	**All actions and costs have been embedded in the ESMP Matrix Table**	

Annex 8 – Sample Code of Conducts

Individual Code of Conduct

Preventing Gender Based Violence and Violence Against Children

Definitions:
Gender Based Violence (GBV) – is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. It can be sexual, physical, psychological and economic in nature, and includes acts, attempted or threatened, committed with force, manipulation, or coercion and without the informed consent of the survivor. A SURVIVOR is a person who has experienced GBV.
Sexual Exploitation and Abuse (SEA) is the actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes including but not limited to profiting monetarily or socially from sexually exploitation of another
Sexual harassment (SH) is the unwanted behavior of a sexual nature
Violence Against Children (VAC) is both physical and non-physical forms including neglect, maltreatment, exploitation and sexual abuse

I, _____, acknowledge that preventing gender-based violence (GBV) and violence against children (VAC) is important. The company considers that GBV or VAC activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. All forms of GBV or VAC are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

- Consent to police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.
- Not engage in sexual favours—for instance, making promises or favourable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
- Unless there is the full consent14 by all parties involved, I will not have sexual interactions with members of the surrounding communities. 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.
- Attend and actively partake in training courses related to HIV/AIDS, GBV and VAC as requested by my employer.

14 **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

- Consider reporting through the GRM or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
- 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.
- 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" below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labour 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.
- Comply with all relevant local legislation, including labour laws in relation to child labour.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

- Informal warning.
- Formal warning.
- Additional Training.
- Loss of up to one week's salary.
- Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- Termination of employment.
- Report to the police if warranted.

I understand that it is my responsibility to avoid actions or behaviors that could be construed as GBV or VAC or breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual 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 VAC. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____
Printed Name: _____
Title: _____
Date: _____

Contractor's Code of Conduct

Preventing Gender Based Violence (GBV) and Sexual Exploitation & Abuse (SEA)

Definitions:

Gender Based Violence (GBV) – is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. It can be sexual, physical, psychological and economic in nature, and includes acts, attempted or threatened, committed with force, manipulation, or coercion and without the informed consent of the survivor. A SURVIVOR is a person who has experienced GBV.

Sexual Exploitation and Abuse (SEA) is the actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes including but not limited to profiting monetarily or socially from sexually exploitation of another

Sexual harassment (SH) is the unwanted behavior of a sexual nature

Violence Against Children (VAC) is both physical and non-physical forms including neglect, maltreatment, exploitation and sexual abuse

- 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 behaviour will apply to all employees without exception:
- 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 neighbourhoods or at worker's camps. Prosecution of those who commit GBV or SEA will be followed.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Do not use inappropriate language or behaviour towards women, children and men. This includes harassing, abusive, sexually provocative, derogatory, demeaning or culturally inappropriate words, gestures or actions.
- 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 defence.
- Sexual favours or other forms of humiliating, degrading or exploitative behaviour are prohibited.
- Sexual interactions between contractor's and consultant's employees at any level and member of the communities surrounding the work place 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.
- 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.
- 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.
- 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

Preventing Gender Based Violence (GBV) and Sexual Exploitation & Abuse (SEA)

Definitions:
Gender Based Violence (GBV) – is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. It can be sexual, physical, psychological and economic in nature, and includes acts, attempted or threatened, committed with force, manipulation, or coercion and without the informed consent of the survivor. A SURVIVOR is a person who has experienced GBV.
Sexual Exploitation and Abuse (SEA) is the actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes including but not limited to profiting monetarily or socially from sexually exploitation of another
Sexual harassment (SH) is the unwanted behavior of a sexual nature
Violence Against Children (VAC) is both physical and non-physical forms including neglect, maltreatment, exploitation and sexual abuse
Managers at all levels have particular 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

- 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.
- The Action Plan shall, as a minimum, include the
    - Standard Reporting Procedure to report GBV and SEA issues through the project Grievance Redress Mechanism (GRM);
    - Accountability Measures to protect confidentiality of all involved; and,
    - Response Protocol applicable to GBV survivors/survivors (including access to support coping and post-trauma management strategies) and perpetrators.
    - Engagement of the services of social service providers (NGOs) with requisite skill in the prevention and management of GBV and SEA.
- Coordinate and monitor the development of the Action Plan and submit for review to the RAMP-PIU safeguards teams, as well as the World Bank prior to mobilization.
- Update the Action Plan to reflect feedback and ensure the Action Plan is carried out in its entirety.
- 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 tame will be recognized in employee's scope of work and performance evaluations.
- Ensure that contractor, consultant and client staff are familiar with the RAMP GRM and that they can use it to anonymously report concerns over GBV and SEA.
- Hold quarterly update meetings with the compliance team to discuss ways to strengthen resources and GBV/SEA support for employees and community members.
- 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.

- 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

- 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.
- 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.
- 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.
- Collect satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.
- Prevention
- 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.
- Managers must verbally and in writing explain the company and individual codes of conduct to all direct recruits.
- 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.
- 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.
- Managers will explain the GRM process to all employees and encourage them to report suspected or actual GBV/SEA
- Mangers 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.
- Managers must provide support and resources to the compliance tea and service provider NGOs to create and disseminate the internal sensitization initiatives through the Awareness-raising strategy under the Action Plan.

Response

- 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.

- 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).

- 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.

- 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:

  - Informal warning
    ii. Formal warning
  - Additional Training

iv. Loss of up to one week's salary.

- 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: _____

Annex 9 – Campsite Management Plan

The objectives of the Camp Management Plan are:

- Avoid or reduce negative impacts on the community and maintain constructive relationships between local communities and workers' camps; and
- Establish standards on worker welfare and living conditions at the camps that provide a healthy, safe and comfortable environment.

This Plan is supplementary to other plans prepared in this ESMP and for the project such as: Traffic Management Plan

- Security Plan
- Waste Management Plan
- Occupational Health and Safety Plan
- Labor Influx Plan

Legal Requirements and Grievances

The Contractor is required to operate within the parameters of the Nigeria Labour Law and the International Labour Organization guidelines. The World Bank Performance Standards are applicable to AGILE and its sub projects. Furthermore, the Grievance Redress Mechanism contained in this ESMF is required to be adhered to by the Contractor.

Contractor personnel shall conduct regular safety walks and an HSE committee will track performance against requirements stipulated in this plan. The Contractor will also have its grievance mechanism developed for the project.

Additionally, Contractor would be required to sign and acknowledge the Code of Conduct and agree to abide by its provisions.

Management and Monitoring

Table 25 presents a summary of the potential impacts related to camp activities, together with mitigation and management measures to avoid or reduce these impacts, and the monitoring required to assess the performance of these measures.

The Contractor shall develop a Contractor Plan which shall, as a minimum, incorporate the camp management measures described in the Table below. The Contractor shall not be limited to these measures.

Monitoring to be undertaken as part of this Plan is described in the Table below. The Contractor is responsible for developing area or site-specific procedures for the monitoring program (where necessary) based upon the final design details of the infrastructure

Table 26: Management and Monitoring of Contractors Campsite

Aspect	Potential impact	Mitigation & Management	Monitoring	Frequency	Responsibility
Community Relations	Unauthorised movements of construction workers (during and after working hours) could result in trespassing, damage to local land and property and create amongst local residents a sense of their privacy being invaded. Residents may feel vulnerable and there may be increasing incidents of crime and or violence (GBV etc) and threats to the safety of community members. Disparity of pay, increase in disposable income and potential availability of illegal substances, illicit or culturally inappropriate lifestyle choices, leading to increased tension between local communities and the workers at camps.	Contractor shall enforce a 'closed' camp policy unless otherwise agreed and approved by Company. Workers will comply with the agreed camp closure hours. Contractor shall implement suitable measures to maintain the closed camp policy which may include perimeter security fences, security controls and guard houses, monitoring transfer of goods into and out of camps for contraband and stolen goods. Contractor should refer to the Project Security Management Plan. Contractor, as appropriate, shall provide adequate recreation facilities for workers to reduce incentive for leaving camps during leisure time. Contractor shall limit workers interaction with the community when outside the camp e.g., by organising transport directly to and from the worksite. If community members or local businesses express grievances in relation to camp related activities/operations, the Project shall respond to the grievance in accordance with the Grievance Redress Mechanism contained in the ESMF. NPCU/SPIU may request that camp related activities/operations be amended to address community grievances. Contractor shall comply with these requests. Workers shall abide by camp rules which include a disciplinary process to be developed by the contractor once appointed. The Project shall, be cognisant of the environment in which it works and shall, where practicable, respect local cultural events such as religious events, funerals and the like. The Project shall provide training to all workers on camp management including A briefing on camp rules, including closed camp policy, behaviour between fellow workers and the community;	Monitoring and Verification	Continuous Every 3 months Every 6 months Continuous Continuous Continuous Every 3 months Continuous Every 3 months	Contractor, Supervising Consultant and SPIU CBMC

Aspect	Potential impact	Mitigation & Management	Monitoring	Frequency	Responsibility
		11. Procedures for dealing with camp related complaints, worker issues and community issues and Community relations orientation. The objective of this orientation will be to increase awareness about the local area and cultural sensitivities.			
Health	Potential interaction between workers, persons engaged in illicit activities and the community increases the risk of spreading communicable diseases, particularly in more remote communities. Camp operations have the potential to develop favourable conditions for pests and disease, which could impact the health of workers and the community, as well as affect community livelihoods	Contractor shall comply with the Minimum Health Requirements for Project Execution and the Community Health and Safety Management Plan which set out requirements and management measures on controlling communicable diseases within camps and to outside communities Contractor shall enforce the closed camp policy to limit interaction with community The Contractor will ensure regular fumigation of the campsite to prevent pests and insects, clearing bushes in the surroundings, avoid stagnant water in the environment, use door and window nets to keep rodents and insects away. Posters and informational sessions will be conducted to raise awareness among the workforce and communities locally around the worker camps.	Verification	Every three months Continuous Every three months	Contractor Supervising Consultant SPIU E&S Team
Waste management, pollution and environmental impacts	Camp has the potential to have off site pollution impacts from waste disposal, emissions and spills. Camp operations may also cause environmental issues including deteriorating water quality, erosion, sedimentation, noise and air quality issues. These factors have the potential to affect the community if not adequately managed.	Contractor shall exercise all reasonable due diligence to conduct its operations in a manner that will minimize pollution. Contractor shall comply with the Waste Management Plan and Hazardous Materials Management Plan which define requirements to contain, transport, handle and dispose of camp wastes and hazardous materials to avoid impacts to human health and the environment. Contractor shall also apply appropriate mitigation measures as contained in this ESMF.	Verification & Notification	Continuous	Contractor Supervising Consultant SPIU
Community resources	Any infrastructure, services or resources used by camps (e.g. water abstraction) that result in reductions/ shortage/interruptions for the local community will have a negative impact. There is potential for social envy and increased resentment from the community towards the Project and	Contractor shall utilise water sources for camp use in a manner that minimises impacts on local supply and use. Where necessary, water supply should be sought outside of the community source(s). The Project shall routinely monitor quality and supply of water source used by camp through quarterly sampling exercises. Contractors shall be encouraged to extend Corporate Social	Verification and On-going	Prior to establishing the camps Every 3 months Annual	Contractor Supervising Consultant SPIU

Aspect	Potential impact	Mitigation & Management	Monitoring	Frequency	Responsibility
	project team if camp facilities are perceived to be superior to those in the community. Services of note include camp health facilities, power supply, clean running water. Restricted ability to access these services may increase frustration at the level of the services available to them.	Responsibility projects to host communities.			
Camp location	Siting of camps may result in conflicts with community members. Construction camps may result in a noticeable increase in traffic, noise, air emissions and light intrusion which could negatively affect the amenity and lifestyle of nearby communities and pose a potential safety issue.	Potential camp locations will be selected in consultation with SPIU and affected communities. Necessary permits will be obtained from the relevant Local Authorities for the approved camp location. The Project shall refer to those Environmental & Social Management Plan's (ESMP) that include mitigation/avoidance measures that relate to the local community, including: Noise and Vibration Management Plan; Air Emissions Management Plan; and Waste Management Plan.		Prior to establishing the camp Continuous	Contractor and/or Company Community SPIU
Labour Influx	There is a likelihood of influx of non local labour into areas around the construction camps. However, people from outside of the local area may migrate into existing settlements or develop new settlements in proximity to camps and the Project area. Labour Influx can result in disputes and sometimes violence between the new settlers and the resident community. Migrants moving into existing settlements may increase demand and inflate prices for housing, goods and services. Increased population and development of new and uncontrolled settlements increase pressure on infrastructure, services and resources. Major labour influx related risks include workers' sexual relations with minors and resulting pregnancies, presence of sex workers in the community, the	Contractor shall enforce a 'closed' camp policy. This is intended to deter individuals setting up near camp. Contractor shall develop a Labour Influx Management Plan. Contractor is to coordinate with Local government to ensure that no illegal and unsafe settlements develop. Workers will be sensitised on and sign the Code of Conducts which prohibits sexual relations with people in the project area, use of alcohol (can be monitored by using breathalyser or drugs, and any form of illicit behaviour Contractor shall review and ensure adherence to labour influx management plan.	Verification	Continuous	Contractor and SPIU

Aspect	Potential impact	Mitigation & Management	Monitoring	Frequency	Responsibility
	spread of HIV/AIDS, sexual harassment of female employees, child labour and abuse, use of hard drugs and alcohol, increased drop out rates from school, poor labour practice and lack of road safety.				
Worker welfare and living conditions	Construction workers living in camps may encounter stresses and discomforts that negatively impact their health and welfare. These stressors or discomforts may be caused by Poor living conditions (accommodation, ablution and sanitary, health, recreation catering and laundry).	Contractor shall comply with minimum standards for camp buildings, facilities and services in line with the Bank standard or as contained in the Project Invitation to Tender (ITT) requirements. This will include separate sleeping spaces and toilets for male and female workers with ability to lock from inside, WASH facilities should comply with WHO standards including portable water with well-placed overhead tanks, wash basins and concrete and covered septic tanks Sleeping matrasses should be provided for all workers to avoid them sleeping on the floor First aid kits should be provided in the Camp sites and the HSE officers should receive training on first aid The area should be secured and security arrangements should be made to ensure workers safety	Verification	Continuous	Contractor, Supervising Consultant and SPIU
	Cultural issues (nationality, religion, discrimination, GBV and harassment, etc.).	Contractor shall ensure that applicable ESMF mitigation measures for specific issues are applied. Contractor may provide prayer rooms and other facilities, as necessary and to the extent practicable, to satisfy the religious needs and customs of its workforce. Contractor's personnel shall not engage in any discrimination, GBV, SEA or harassing behaviour. Contractor shall establish an Equal Opportunity Policy to promote non-discrimination in accordance with Labour and Worker Conditions Management Plan. Contractor shall implement a worker grievance procedure to address grievances between workers. .	Verification	Continuous	Contractor
	Mental health issues (morale, isolation, family attachments, boredom).	Camps will be treated as closed camps. Camp rules in relation to alcohol consumption and drug prohibition will be complied with. Contractor shall provide recreational facilities where practicable. Contractor will provide counselling for all workers, with no	Verification	Continuous Every 6 months	Contractor

Aspect	Potential impact	Mitigation & Management	Monitoring	Frequency	Responsibility
		discrimination by race, sex or religion.			
	Personal security (crime, and emergencies).	Camps will be controlled by security to avoid intrusions from outside community. Work Site Security Plan to be developed by Contractor shall include security measures to be provided at the camps which may include fencing, locks, alarms, pass card systems, badge and pass system, access points, safe transport of personnel as appropriate. Contractor shall develop an Emergency Response Plan that meets requirements set out in ITT package	Verification	Prior to establishing camp	Contractor
	Environmental stress (climate, noise etc.).	Contractor shall comply with Minimum Health requirements for Project Execution including the following: Accommodation will be designed to suit climatic conditions; Accommodation and surroundings shall be constructed so that noise does not interfere with sleep to the extent that is reasonably practicable; and Health and hygiene inspections shall be carried out.	Verification	Continuous	Contractor/SPIU
Decommissioning	Decommissioning of camps has several potential impacts: • Local employment and provision of local goods and services at camps will no longer be required; • Locals employed and previously accommodated in camps will no longer have access to services and benefits available at camps (e.g. health services, recreation facilities); and • Infrastructure which provides benefits to communities may no longer be maintained (e.g. roads, camp boreholes) and may be decommissioned and removed.	Contractor is to follow retrenchment procedure contained in Labour and Worker Conditions Management Plan (if available) Where Community requests, some infrastructure and services may be retained as advised by the NPCU and the World Bank: 1. Disturbed areas will be reinstated; 2. Where practicable, Contractor will return camp areas to former landforms; 3. No facilities will be maintained in or near especially environmentally or socially sensitive areas; and 4. Where there are negative consequences of induced access, the facility will also be decommissioned and the area reinstated.	Verification	Continuous	Contractor SPIU

Annex 10 – Labor Management & Labor Influx Plan

This plan identifies labour requirements and sets out the procedures for addressing labour conditions and risks associated with the proposed project, which is aimed at helping Katsina AGILE to determine the resources necessary to address project labor issues. It also contains specific actions to address the risks associated with labor influx to the local communities.

Introduction

A Labor Management Procedure was developed for the AGILE project as a framework which identifies labor requirements and sets out the procedures for addressing labor conditions and risks associated with the proposed project in line with the World Bank ESS 2: Labor and Working Conditions and National labor requirements. Katsina AGILE has domesticated the Labor Management Procedure into a site-specific Labor Management Plan (LMP) for the proposed new construction works in 150 schools as described in the following sections.

This LMP covers contracted workers, community workers and primary suppliers for the construction works (component 1.1). However, the LMP excludes government workers/civil servants working in connection with this project who will be governed by a set of public service rules, except there is a legal transfer of their employment or engagement to this project, and technical consultants engaged for expertise contracts who will be governed by mutually agreed contracts with the SPIU/NPCU.

Objectives of the LMP

ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The objectives are as follow:

- To promote safety and health at work
- To promote the fair treatment, non-discrimination, equal opportunity of project workers and decent work conditions
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate
- To prevent the use of all forms of forced Labour and child Labour.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law
- To provide project workers with accessible means to raise workplace concerns

Labor Requirements and Associated Risks for the Subproject

The new construction works will make use of various categories of direct and indirect staff, and workers as follows:

Table 27: Category of Project Workers

Category	Description	Examples	Number
Direct Workers	Government Workers: • Civil servants from various relevant line ministries working at the NPCU and the SPIU • Principal, school staff and teachers deployed to work in the newly constructed schools	Officers serving on the project including environment, social, gender, procurement, engineer etc. School principal, management staff, teaching & non-teaching staff	i) 80 (SPIU & NPCU ii)1,500 teachers & school staff
	Technical consultants	Technical Assistants (TAs), ESMP/RAP/	20

		GBV/Engineering consultants etc.	
Contracted Workers	Workers engaged through third parties for the new construction civil works	Skilled and unskilled labor, sub-contractors, contractors drivers etc.	3,600
Primary Suppliers	Suppliers of construction materials, school equipment/supplies	Suppliers of gravel, sand, stone, roofing sheets etc.	30
Community Workers	People employed or engaged from the communities to provide labor and services to the project. This could be for civil works or to oversee the coordination and implementation of the project	Skilled & unskilled labor engaged from the project communities by the contractors (about 70% of required unskilled labor) Community Based Management Committee (CBMC)	4,200 (28 in each site x 150) 750 (5 in each project community)

Table 28: Labor Risk & Impacts and Mitigation

Risk/Impact	Impact Analysis	Mitigation
Arbitrary decisions by contractors on terms and conditions of employment	• The duration of the contracts offered to contractor workers are short and may not allow employees adequate time and information for meaningful collective bargaining, leading to discontent of employees and disputes. • Project workers may not be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment.	• The SPIU will closely supervise the Contractor Recruitment Plan and ensure fairness of Employment Terms and Conditions against the applicable and prevailing National stipulations • 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.)	• 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.	• 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, as well as the necessary training and information about the Labor Management Procedures as stated in this ESMP • The SPIU shall inspect the campsites to ensure workers have appropriate living quarters with basic amenities provided and sanitation facilities separate for male and female. • 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	• 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 conditions, unequal pay, varying closing time etc. even when they are on the same level of qualification and experience	• 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, promotion, termination of employment or retirement, or disciplinary practices. • The SPIU is 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.

Risk/Impact	Impact Analysis	Mitigation
SEA/ Sexual Harassment of teachers and school staff and contract workers	• Risks of sexual harassment of teachers and other staff is possible • Workers engaged by the project may also be exposed to SEA/SH/GBV	• GBV GRM focal persons and process for reporting incidents will be set up in each school. • Training and sensitisation will be conducted for teachers & school staff on preventing & reporting SEA/SH incidents • Workers will be sensitised on Code of Conducts, prevention & reporting of such incidents • Contractor to ensure safe work environment: separate marked rooms and toilets for male and female workers, avoid work at night etc.
Child Labor	• 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	• The minimum age of eighteen (18) will be enforced at recruitment and in daily staff team talks by Contractors. The supervision consultant will monitor this compliance on site. • Contractors will liaise with community liaison officers/leaders 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	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.	• 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 which will be reviewed by the SPIU Social officer. Contractors will ensure that if labor is sourced from any sub-contracting agency, the workers are not subject to coercion and forced labor conditions.
Labor Influx	• 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	• 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 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 • Ensure there is a working GBV-GRM on site that people can lodge their complaints without fear of reprisal
Grievance Mechanism	• Workers may be aggrieved due to unfair treatment, poor working conditions, conflicts, poor pay,	• A GRM has been designed for workers in section 6.8 to address concerns promptly, using an understandable and transparent process that provides timely feedback to

Risk/Impact	Impact Analysis	Mitigation
	overstretched working hours amongst other things.	those concerned in a language they understand, without any retribution, and will operate in an independent and objective manner • The workers will be sensitized on the use of the GRM by the contractor and the SPIU team upon recruitment and induction training • The SPIU shall provide oversight to ensure effective implementation of the GRM. • The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law
Occupational Health and Safety	• 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 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	• 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 First aid boxes should also be provided at construction site, staging area and mobile All sites and staging areas should be appropriately cordoned off to prevent unauthorised access • Contractors will prepare Occupational Health and Safety Plans • Contractors should report OHS accident/incidents to the SPIU promptly, and the SPIU/NPCU should report this to the Bank within 48hrs (in accordance with the Environmental and Social Commitment Plan (ESCP) • Contractors should ensure training for their drivers and liaise with the Katsina Road Traffic Agency (KASROTA) to control traffic during project implementation
Right of Association and Collective Bargaining	• 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	• 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	• Lack of records and evidence could expose the contractors to litigation or accusation from workers or their representatives	• 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 • Records of grievances and how they were resolved • Records of all sanctions, punishments and terminations with reasons and follow-up actions taken • Documents should be kept at the site office with the site engineers and SPIU office

Risk/Impact	Impact Analysis	Mitigation
		• The NPCU team should check these records during monitoring visits
Primary Suppliers	• Primary suppliers could also have occupational injuries, incident/accidents while performing project related functions • They could also make use of child labor, forced labor in their operations	• Primary suppliers should maintain records related to occupational injuries, illness and lost time accident, which should be reviewed by the contractor quarterly • A checklist for primary suppliers has been included in this ESMP and will form part of the contractual agreement with contractors to ensure due diligence on E&S compliance. This will be part of the Standard bidding document.
Security risks	Project workers, primary suppliers could be exposed to security risks in the project areas such as kidnapping, banditry, theft etc.	• SPIU will engage a security adviser and also prepare & implement a security management plan in conjunction with the State Government, Police, NSCDC etc. • SPIU, Supervision Consultants, Contractors to develop security management plan in conjunction with the police and NSCDC. • The SPIU to ensure security coverage for all consultants engaged on the project
Unfair Discipline and Termination of Employment	Workers may be unfairly penalised or dismissed, coerced or blackmailed to avoid disciplinary measures or termination	• Disciplinary process should be laid out before commencement of work and explained to every worker • Termination of appointment should abide by the following principles: Valid or reasonable; Clear and unambiguous; The employee is aware, or could reasonably be aware of the rule or standard; and • The supervision consultant and the SPIU social officer/ GRM officer 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

The risks and impacts associated with project workers and the risk associated with labor impacts are moderate due to the nature of construction activities which are well understood and largely within existing schools. The potential impacts can largely be avoided, minimized or managed through specific actions set out in table 32 below. This section outlines specific actions to be implemented including responsibility and timeline. Additional measures are stipulated in the General environmental management conditions for construction contracts in annex 4 and a Labour Management & Influx Plan in annex 10. While most of the actions are the obligation of contractors, the Supervision consultants and SPIU E&S officers will monitor compliance to all the conditions stated in this LMP and include this in the monthly E&S reports to be sent to the NPCU.

Table 29: Specific Actions on LMP Implementation

Area of Concern	Actions to be implemented	Responsibility	Timeline
Recruitment and Terms of Employment	• Ensure non-discrimination in recruitment processes and terms of engagement especially against women and PWD • Formal contracts should be issued and signed for all skilled labor • Documented agreements to be made with unskilled labor including community labor which should be understandable language and signed by the employee/community liaison officer • Contracts/agreements should stipulate position & work schedule, working hours, salary/wages, rest periods, penalties & sanctions,	Contractor Supervision Consultants SPIU Social Officer	Preconstruction and Construction Phase
Poor working conditions	• Minimum wage to be paid for workers should not be less than the National minimum wage of N30,000. Payment should also be regular as stipulated in the agreement • Campsites to have appropriate living quarters, sanitation facilities separate for male and female, basic amenities including water and food, electricity especially to lighten up dark areas and adequate security • Working hours will not be more than the hours of 8am – 6pm, with an hour break period. Sundays will also be observed as rest periods for workers. • Sick leave will be observed for workers and they will be paid during the sick/ injury period as long as it can be established that the ill-health is directly due to the work	Contractor Supervision Consultants SPIU Social Officer	Preconstruction and Construction Phase
Child Labor	• The minimum age of eighteen (18) will be enforced at recruitment and for adhoc/community workers to be engaged by contractors. The supervision consultant will monitor this compliance on site. • Contractors to liaise with community liaison officers/leaders to attest to the age and conduct of all local hires, and maintain a list of same • All workers to sign code of conducts to ensure their conduct is not detrimental, with respect to education or be harmful to the child's health or physical, mental, spiritual, moral or social development	Contractor Community Liaison Officers All workers	Preconstruction and Construction Phase
Forced Labor	• No forced labor is permitted on the project • A consent section will be part of the employee signed employment contract/ agreement • Contractors will ensure that if labor is sourced from any sub-contracting agency, the workers are not subject to coercion and forced labor conditions. A checklist has been included in the annex and will form part of the contractual agreement with contractors to ensure due diligence on E&S compliance for any subcontractors. This will be part of the Standard bidding document	Contractor Supervision Consultants SPIU Social Officer and Procurement	Preconstruction and Construction Phase
Labor Influx	Contractors will maximise employment of unskilled labor from the project communities Workers will sign Code of Conducts and ensure they maintain appropriate relations with local	Contractor	Preconstruction and Construction Phase

	communities Contractors will make resources available for their workers to avoid competition with communities including water, healthcare as as stipulated in the general conditions of contracts in annex 4 Contractors will not have their campsites in the school premises or within the communities. Rather either they lodge in town or outskirts of the community in line with section 3.4.3 Workers to abide by all SEA/SH/GBV code of conducts	All workers	
SEA/SH/GBV	• Conduct sensitization & trainings for workers on Code of Conduct, SEA/SH/GBV prevention & response mechanisms including information on GBV focal persons and the GBV service providers • Ensure all workers sign Code of Conducts (sample provided in annex 8)	Contractor/ GBV experts Contractor/ Supervision Consultant	Preconstruction and Construction Phase Monthly Refresher
Occupational Health and Safety	• Submit company HSE Manual to the SPIU • Conduct HSE trainings and specialized job trainings for workers • Procure appropriate PPEs for all workers including adhoc workers, community workers • Ensure the day-to-day compliance with specified HSE measures including those in the OHS Plan in annex 6 • Conduct daily HSE PEP talks • Ensure availability of first aid boxes construction site, staging area and mobile kits, and well trained officers in first aid • Report HSE incidents and accidents to the contractor management	Contractor HSE Officer on every contractor team	Upon contract signing During Pre-construction/ Construction phase Daily
Grievance Management	• Sensitise workers on the available GRM channels and their rights to use them including complaint boxes, GRCs, phone lines as stated in section 6.8 • Ensure implementation of the GRM and ensure that all complaints by workers are resolved • Complaints related to GBV/SEA/SH should be channeled to the GBV GRM focal person who will implement the GBV GRM protocol stipulated in section 6.7 • SPIU will ensure that workers are informed of their right of association and collective bargaining. However, they will not be victimised for forming unions or associations • Beneficiaries/complainants would be assured that there will be no retribution of persons especially females or cultural restraints when cases are reported discretely	Contractor/SPIU GRM Officer GBV GRM Focal Person	During Preconstruction phase/ During site meetings. As required
Discipline and Termination of Appointment	• Penalties & sanctions should be explained to workers in an understandable language at the point of engagement • Termination of an appointment must be valid or reasonable, clear and unambiguous. • The supervision consultant and the SPIU social officer/ GRM officer 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	Contractor Supervision consultant/ SPIU social officer/ GRM officer	Preconstruction and Construction Phase

Security	Supervision Consultants, Contractors to develop security management plan in conjunction with the police and NSCDC. This will be reviewed by the SPIU	Contractor Supervision Consultant	Upon contract signing
Reporting	Minor incidents and near misses will be reported to the SPIUs on a monthly basis Major accidents, deaths, GBV/SEA/SH issues should be reported to the SPIU immediately and not later than 24hrs The SPIU to flag major issues including major accidents, death, GBV/SEA/SH issues to the World Bank within 48hrs.	Contractor HSE Officer/ Supervision Consultant SPIU	Monthly As required
Record Keeping	Site managers to keep records of workers engaged under the Project, including contracts must be kept, records of all training attended by workers including CoC, HSE, GBV etc. Records of 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 Records of grievances and how they were resolved Records of all sanctions, punishments and terminations with reasons and follow-up actions taken Documents should be kept at the site office with the site engineers and SPIU office	Contractor Supervision Consultant SPIU	As Required

While the risks and mitigation plan associated with recruitment/engagement of Labor has been detailed above, there is also the risk of Labor Influx (influx of foreign workers/non-indigenes) to the project communities. Table below highlights such risks, the accompanying mitigation and monitoring plan

Table 30: Labor Management and Monitoring Plan

SUB-CATEGORY	WORKER IMPACTS\RISKS	PROJECT IMPACTS\RISKS	MITIGATION MEASURES	MONITORING	MONITORING FREQUENCY	RESPONS-IBILITY
Employment	Influx of many foreigners into project communities	Competition on livelihood and job opportunity with locals	Unskilled labour shall be from the project communities. Where possible qualified skilled workers on contract shall also be sourced within the community	Verify	Onset of Project and bi-weekly	Contractor Monitoring: Supervision Consultant SPIU E&S team
Public health	Spread of diseases and outbreaks amongst workers such as COVID, Monkeypox, STDs etc.	Increase in Lost Time Injuries can result in delays in implementation and also expose the communities to public health risks	Worksite and campsite should be kept clean with adequate sanitation facilities provided. Contractor to engage with health facilities in the area to aid timely reporting and treatment of workers health concerns. The emergency numbers for the Katsina State Ministry of health can be contacted as well: 09035037114, 09047092428. Contractors are also advised to conduct pre-employment medical examination for their workers	Assessment	Monthly	Contractor Monitoring: Supervision Consultant SPIU E&S team Primary Health Care Centres/LGAs
Grievances/conflict	Grievances amongst workers or with the host schools/communities can lead to fights, injury, unrest	Grievances could attract legal action against the project, cause harm to workers/community members, and delay project implementation	Implement the defined GRM for workers and also for the project to ensure timely reporting and resolution of grievances. Periodic consultations should be held with workers to ascertain any issues or concerns they may have	Assessment	Monthly	Contractor Monitoring: Supervision Consultant SPIU E&S team Grievance Redress Committees
Housekeeping.	The general appearance of the camp deteriorates making camp life unpleasant.	The overall camp experience is compromised which in turn leaves workers demoralised and unproductive.	Ensure that campgrounds and common areas are routinely cleaned and organised with appropriate signage in place, and that grounds are maintained (e.g., grassed areas are regularly mown). Establish easily accessible, designated smoking areas which are clearly highlighted and regularly cleaned.	Verify	Monthly	Contractor Monitoring: Supervision Consultant SPIU E&S team
Recreation.	Workers spend most of their time in the camps and could become disenchanted and bored. They may want to leave the camps and go into the local towns and villages in search of recreation.	Tensions arise from the local communities as workers impact their activities in search of recreation. An increase in alcohol consumption and prostitution could result due to the influx of workers into local communities.	Provide appropriate recreational facilities and activities such as football, table top games e.g Ludo, whot, draft etc,. These should be discussed with the camp residents committee.	Assessment	Quarterly	Contractor Monitoring: Supervision Consultant SPIU E&S team
Spiritual /Religion.	Workers will want access to places of worship for their chosen religion. They may leave the camps and go into	Tensions arise from the local communities as workers impact their activities.	Provide appropriate places of worship where residents express a need for this in accordance with cultural sensitivities, and assess transport arrangements on a case-by-case basis.	Assessment	Quarterly	Contractor Monitoring: Supervision Consultant

	the local towns and villages in search of an appropriate place of worship.		Ensure that equipment and facilities are kept clean and well maintained.			SPIU E&S team
SUB-CATEGORY	**WORKER IMPACTS\RISKS**	**PROJECT IMPACTS\RISKS**	**MITIGATION MEASURES**	**MONITORING**	**MONITORING FREQUENCY**	**RESPONS-IBILITY**
Security.	Workers may be exposed to security risks such as banditry and kidnapping	Workers are kidnapped and stop work is issued until the issue is resolved	Security management to be prepared by the SPIU, Contractors, supervision consultant in conjunction with the State Government and security agencies. Areas that have high security threats should be avoided	Assessment	Continuous	Contractor Monitoring: Supervision Consultant SPIU -E&S Team
Community relations.	Communities are negatively impacted by camp activities: noise, waste, traffic, lighting and so forth. This may result in negative actions towards camp operations such as road closures and the prevention of workers or suppliers from entering the worksite.	Workers are stopped from going to work, which affects productivity.	Implement control measures to avoid and minimise the impacts of camp and living conditions on communities. Limit foreign worker interaction with communities and provide cultural sensitivity awareness training to facilitate appropriate interaction with communities.	Assessment	Quarterly	Contractor Monitoring: Supervision Consultant SPIU E&S TEAM

Annex 11 – Child Labor Prevention Plan

While AGIILE is committed to promoting the use of local labour, the following procedures will be adopted to prevent child labour in addition to the Code of Conduct the following shall apply

- The SPIU will introduce the contractors to the community leaders/ relevant groups.
- Contractors will discuss with community leaders on the number and requirement of community labour for the project and receive a list of such persons as nominated by the community leaders (persons must not be below the age of 18).
- Contractors will only engage individuals at minimum age of eighteen (18) and this will be enforced at recruitment and monitored by the SPIU, Supervision Consultants and contractors.
- Contractors will liaise with the community leaders/liaison officers to verify the identity and age of all local workers. This will require workers to provide official documentation, which could include a birth certificate, national identification card, passport, or medical or school record, where these are not available the community leaser/representative can conduct personal identification of proposed workers. Contractors will liaise with community leaders to attest to the age and conduct of all local hires.
- Adequate documentation of the names, age, job function and remuneration will be prepared and copies will be kept with the community leaders, contractors and supervision consultants.
- Hired project workers above 18 will conduct their 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.
- If a child under the minimum age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, considering the best interest of the child. This will also be reported immediately to the SPIU.

Annex 13 – Borrow Pit Management Plan

In general, the contractor will be expected to carry out the construction works in a manner that will minimize the need for the use of borrow materials where technically feasible.

The contractor is also required to prepare a borrow pit management plan which takes account of these activities and follows them through to handing over. These plans need to take account of the potential environmental & social impact and health & safety hazard; including drowning hazards, water-borne disease vectors, impact on local land holdings, land-use and visual impacts.

The borrow pit management plan will include restoration measures for the site after decommissioning, such as removal and stockpiling of topsoil layers. Where borrow pits are to be left open, for their use in regular maintenance programs, the responsibility for their management should be assigned to the government entity / local authority in charge of road maintenance and compliance with the borrow pit management plan monitored.

Stage	Activities and features	Measures/mitigation	Responsibility
Site selection	Complete a preliminary site assessment prior to undertaking excavation	Outreach to the community leadership (e.g. operation, hazards, restoration) Written approval from community leadership for use of the proposed site Liaise with the local community on the option of retaining quarry pits as water collection ponds for watering cattle, irrigating crops or similar uses. Highlight issues of disease transmission and the need to prohibit its use for drinking, bathing, and clothes washing	Contractor
		When siting borrow pit areas, avoid using sensitive areas or sites that drain directly into a sensitive area Borrow pits will not be located in wetland or densely vegetated areas	Contractor
		Test pits/excavations to confirm the quantity and quality of material in the proposed site Determine presence of any groundwater	Contractor
		Map of the location and a plan of the site, including buffer zone, perimeter berm, stockpiles, operational area Borrow pit design must comply with standards defined (above), Photographic record of the site in its undisturbed state	Contractor
Excavation Operation	Excavation will consider the following measures	Ensure that excavation is accompanied by well-engineered drainage Topsoil is stripped and stockpiled away from other materials and is to be used only for reinstatement, once pit operations are complete Overburden soil (layer between topsoil and material of interest) to be used as a perimeter berm to direct drainage or stockpiled separately to backfill the pit Pit excavations maximum 6 metres in depth, with a vertical slope of 2:1 Excavation below the water table is not permitted Heavy machinery access and operation Carry out necessary preliminary geotechnical investigation to confirm the quality and extent of materials.	Contractor

Stage	Activities and features	Measures/mitigation	Responsibility
		Carry out hydrological assessment to determine the presence and depth of aquifer. The contractor shall ensure that topsoil (150m-500m) is stripped and stockpiled at a separate location and preserved for future reclamation activities.	
	Site access and safety	Barrier (e.g., warning tape, perimeter berms, fencing) to control or discourage public access to the pit Install signposts warning of danger and no trespassing, at no more than 50 meters' distance from the pit Community awareness and outreach on the dangers of borrow pits and that trespassing is prohibited.	Contractor
	Vegetation	Avoid or reduce to a minimum vegetation clearance Existing vegetation within the buffer area should provide some visual and physical screening of the pit operations	Contractor
	Water	If water is required for borrow pit operation, a water extraction point (e.g. borehole) will be established within the site are and will be planned for use by the community once the site is reinstated Drainage structures or pumping will remove any standing water in the borrow pit. Alternatively any pits with 0.75 metres or more of standing water will be fenced Overburden soil can be used as a perimeter berm to direct water drainage away from the site Use drainage features in flatter areas, such as mitre drains and sumps, to remove water from around the road ditches Community members are not allowed to use water at an active borrow pit, for any purpose	Contractor
	Erosion	Erosion control measures undertaken in all aspects of the borrow-pit operation, including: reduced slopes, seeding, etc Protect topsoil stockpiles from wind and water erosion by reducing slopes, using a cover, and/or spraying with water	Contractor
	Dust and noise	If a rock crusher is used, dust control measures shall be put in place (water truck or sprinklers on crushing equipment) Vegetation within the buffer area will screen noise of pit operations	Contractor
Reinstatement of Burrow Pits	Reinstatement of burrow pits will be completed prior to handover of the site	Fill excavated site with suitable materials Spread topsoil on top of the overburden	Contractor
		Develop/construct suitable surface slopes, drainage ditches and conduits to prevent water from collecting at the sites Scarify the borrow pit operational site to encourage vegetation cover Establish a vegetation cover corresponding to at least 75% of the cover present prior to excavation	Contractor

Stage	Activities and features	Measures/mitigation	Responsibility
		(supporting photographs) and maintain following the first rains after reinstatement Minimize erosion by focusing vegetation cover on side slopes of the excavated area Any required seeding will make use of local plant varieties	
Review	Ensure the Borrow pit management plan implementation	Review borrow pit management / monitoring reports Review reinstated borrow pit areas prior to handover of completed road sections Engage local community authorities to take responsibility for long-term borrow pits in their areas Ensure that the responsibility for management of borrow pits left open is assigned to the government entity / local authority Verify conformance with Borrow Pit Management Plan	SPIU/ NPCU

Annex 14A – Tools for In-situ Sampling and Results of Physio-Chemical Analysis

Air Quality Assessment - BH – 4S – Portable multi gas detector

Noise Assessment – Noise Meter

In-Situ Water Quality - Tri-Meter

In-situ water quality - Total Dissolved Solid (TDS)

Soil Auger for soil sample collection

Annex 14B – Air Quality Sampling Locations and Results of Analysis

LGA	Sampling Location	Lat.	Long.	Sample Code	VOC	SPM 2.5	SPM 10	Air Quality Status
Batagarawa	Kayauki	13.0100	7.7024	AS-1	ND	19.1	53	GOOD
	Jino	12.9385	7.5666	AS-2	0.09	18	50	GOOD
	Dabaibayawa	12.8579	7.5819	AS-3	0.05	19	53	GOOD
Baure	Bare	12.7945	8.9264	AS-4	0.07	14	48	GOOD
	Maibara	12.8488	8.6454	AS-5	0.08	15	41	GOOD
	Garki	12.8015	8.7841	AS-6	0.05	27	65	GOOD
Bindawa	Bindawa	12.6680	7.8151	AS-7	0.06	17	50	GOOD
	Dan-Marke	12.6124	7.9915	AS-8	0.09	14	44	GOOD
	Kiluki	12.7241	7.9514	AS-9	0.09	21	49	GOOD
	Doro	12.7729	7.9113	AS-10	0.07	22	53	GOOD
Charanchi	Kadanya	12.3786	7.6992	AS-11	0.04	21	56	GOOD
	Dambuna	12.6274	7.7554	AS-12	0.05	22	60	GOOD
Dutsinma	Yarima	12.4469	7.4958	AS-13	0.04	15	35	GOOD
	Shema	12.5121	7.5379	AS-14	0.03	13	37	GOOD
Matazu	Kogari	12.4098	7.5300	AS-15	ND	14	50	GOOD
Rimi	Sabon Gari	12.7431	7.7412	AS-16	ND	17	31	GOOD
	Rimin Guza	13.0165	7.7817	AS-17	ND	12	34	GOOD
	Sabon Garin	12.7431	7.7412	AS-18	0.05	14	26	GOOD
Katsina	Shinkafi	13.0266	7.6421	AS-19	0.06	16	29	GOOD
Kaita	Matsai	13.1734	7.6860	AS-20	0.08	16	41	GOOD

LGA	Sampling Location	Lat.	Long.	Sample Code	VOC	SPM 2.5	SPM 10	Air Quality Status
	Dutsin	13.1769	7.6872	AS-21	0.04	14	45	GOOD
	GDJPSS Kaita	13.0768	7.76278	AS-22	ND	19	30	GOOD
Mani	Bagiwa	12.8940	7.8856	AS-23	0.05	10	37	GOOD
Mashi	Afadu	13.1747	7.9594	AS-24	0.03	13	26	GOOD
	Kafin	12.9832	7.9496	AS-25	0.075	13	33	GOOD
	Kasanki	13.2515	7.9796	AS-26	0.071	12	36	GOOD
Sandamu	Tsadoji	12.9621	8.3591	AS-27	ND	10	29	GOOD
	Kagare	12.9623	8.4056	AS-28	0.03	15	33	GOOD
Ingawa	Matallawa	12.7823	8.1253	AS-29	0.09	21	50	GOOD
	Dugul A	12.7105	8.0679	AS-30	ND	13	38	GOOD
Musawa	Dankande	12.0983	7.7659	AS-31	ND	11	42	GOOD
	Jikamshi	12.1733	7.7685	AS-32	0.051	13	42	GOOD
	Galadima	12.0990	7.7683	AS-33	0.037	12	29	GOOD
Jibia	AUMPS Daddara	13.0895	7.3940	AS-34	0.030	12	38	GOOD
	GJSS Daddara	12.5524	7.8111	AS-35	0.025	16	49	GOOD
Zango	Garni	12.8601	8.5201	AS-36	ND	13	25	GOOD
	Dargage	13.0583	8.4735	AS-37	0.09	12	32	GOOD
Bakori	Kandarawa	11.7559	7.3674	AS-38	0.05	14	34	GOOD
	Kwantawaram	11.6128	7.6120	AS-39	0.09	10	42	GOOD
	Makurdi	11.6550	7.4862	AS-40	0.09	13	39	GOOD
	Kabomo	11.6006	7.4535	AS-41	0.085	13	36	GOOD
	CGDSS Bakori	11.5665	7.4345	AS-42	0.06	14	30	GOOD
Kurfi	Kufan Agga	12.6560	7.4897	AS-43	ND	10	34	GOOD
				FME Limit	**0.1**	**<35**	**150**	

Annex 14C – Noise Level Sampling Locations and Results of Analysis

Noise Level

LGA	Sampling Location	Lat.	Long.	Sample Code	Min (dB) ~	Max (dB) ~
Batagarawa	Kayauki	13.00996	7.7023588	NL-1	24	33
	Jino	12.93854	7.5666317	NL-2	28	39
	Dabaibayawa	12.858	7.5819	NL-3	26	41
Baure	Bare	12.7945	8.9264	NL-4	24	37
	Maibara	12.8488	8.6454	NL-5	26	35
	Garki	12.8015	8.7841	NL-6	32	37
Bindawa	Bindawa	12.668	7.8151	NL-7	35	33
	Dan-Marke	12.612	7.9915	NL-8	28	42
	Kiluki	12.724	7.9514	NL-9	42	31
	Doro	12.773	7.9113	NL-10	24	41
Charanchi	Kadanya	12.379	7.6992	NL-11	29	36
	Dambuna	12.627	7.7554	NL-12	36	38
Dutsinma	Yarima	12.447	7.4958	NL-13	42	36
	Shema	12.512	7.5379	NL-14	33	42
Matazu	Kogari	12.41	7.53	NL-15	29	41
Rimi	Sabon Gari	12.743	7.7412	NL-16	25	38
	Rimin Guza	13.017	7.7817	NL-17	25	38

LGA	Sampling Location	Lat.	Long.	Sample Code	Min (dB) ~	Max (dB) ~
	Sabon Garin	12.743	7.7412	NL-18	33	32
Katsina	Shinkafi	13.027	7.6421	NL-19	44	48
Kaita	Matsai	13.1734	7.6860	NL-20	33	28
	Dutsin	13.1769	7.6872	NL-21	37	38
	GDJPSS Kaita	13.0768	7.76278	NL-22	32	28
Mani	Bagiwa	12.894	7.8856	NL-23	32	44
Mashi	Afadu	13.175	7.9594	NL-24	28	36
	Kafin	12.9832	7.9496	NL-25	35	38
	Kasanki	13.252	7.9796	NL-26	35	36
Sandamu	Tsadoji	12.9621	8.3591	NL-27	43	35
	Kagare	12.9623	8.4056	NL-28	34	39
Ingawa	Matallawa	12.782	8.1253	NL-29	44	38
	Dugul A	12.71	8.0679	NL-30	28	39
Musawa	Dankande	12.098	7.7659	NL-31	24	42
	Jikamshi	12.173	7.7685	NL-32	44	38
	Galadima	12.099	7.7683	NL-33	28	40
Jibia	AUMPS Daddara	13.0895	7.3940	NL-34	32	45
Kankia	Kankia	12.5524	7.8111	NL-35	33	40
Zango	Garni	12.8601	8.5201	NL-36	35	35
	Dargage	13.0583	8.4735	NL-37	34	38
Bakori	Kandarawa	11.756	7.3674	NL-38	28	39
	Kwantawaram	11.613	7.612	NL-39	28	41
	Makurdi	11.655	7.4862	NL-40	26	33
	Kabomo	11.601	7.4535	NL-41	36	37
	CGDSS Bakori	11.567	7.4345	NL-42	24	38
Kurfi	Kufan Agga	12.656	7.4897	NL-43	27	39
Funtua	Makera	11.53	7.2959	NL-44	28	42
	Bagari	11.541	7.3146	NL-45	39	43
	Ungwar Inji	11.4884	7.3096	NL-46	29	42
Daura	Sukwanawa	12.9283	8.28803	NL-47	32	44
	Kalgo Gari	13.0331	8.3259	NL-48	30	42
	Matawalle Ahmadu	13.024	8.32191	NL-49	29	42
	FSP Daura	13.038	8.34608	NL-50	26	41
	kurneji	12.9422	8.32417	NL-51	28	42
FMEnv					**60Db**	

Annex 14D – Soil Quality Sampling Locations and Results of Analysis

LGA	Sampling Location	Lat.	Long.	Sample Code	Temp °C	pH (mol/L)	Conductivity (Us/cm)	Pb (mg/kg)	Cr (mg/kg)	Fe (mg/kg)	Zn (mg/kg)
Batagarawa	Kayauki	13.00996	7.7023588	SS-01	28	7.5	112	0.851	0.651	23.5	0.315
	Jino	12.93854	7.5666317	SS-02	26	7.8	98	0.695	0.985	20.8	0.265
	Dabaibayawa	12.858	7.5819	SS-03	30	7.0	105	0.632	1.051	22.2	0.332
Baure	Bare	12.7945	8.9264	SS-04	31	6.9	124	0.7015	0.852	24.6	0.185
	Maibara	12.8488	8.6454	SS-05	29	7.6	132	1.025	0.321	21.6	0.362
	Garki	12.8015	8.7841	SS-06	30	7.1	98	1.106	0.652	22.0	0.235
Bindawa	Bindawa	12.668	7.8151	SS-07	30	7.0	66	0.965	0.345	19.8	0.158
	Dan-Marke	12.612	7.9915	SS-08	28	6.8	75	0.785	0.521	20.7	0.221
	Kiluki	12.724	7.9514	SS-09	30	7.2	69	0.875	0.485	19.3	0.325
	Doro	12.773	7.9113	SS-10	29	6.7	85	0.975	0.602	18	0.254
Charanchi	Kadanya	12.379	7.6992	SS-11	30	7.8	68	0.856	0.721	24.8	0.287
	Dambuna	12.627	7.7554	SS-12	28	7.6	64	0.963	0.685	18.99	0.187
Dutsinma	Yarima	12.447	7.4958	SS-13	25	7.4	70	0.854	0.851	23.39	0.262
	Shema	12.512	7.5379	SS-14	26	7.0	69	0.921	0.456	23.66	0.183
Matazu	Kogari	12.41	7.53	SS-15	29	6.82	82	1.01	0.672	21.29	0.268
Rimi	Sabon Gari	12.743	7.7412	SS-16	30	6.92	79	0.953	0.652	9.54	0.275
	Rimin Guza	13.017	7.7817	SS-17	27	6.62	102	0.785	0.912	14.3	0.301
	Sabon Garin	12.743	7.7412	SS-18	29	6.79	84	0.931	0.725	11.65	0.310
Katsina	Shinkafi	13.027	7.6421	SS-19	31	7.10	91	1.008	0.920	38.55	0.278
Kaita	Matsai	13.1734	7.6860	SS-20	32	7.23	86	1.031	0.523	23.15	0.285
	Dutsin	13.1769	7.6872	SS-21	30	7.45	106	0.912	0.985	22.45	0.296
	GDJPSS Kaita	13.0768	7.76278	SS-22	33	6.98	146	0.321	1.100	20.92	0.320
Mani	Bagiwa	12.894	7.8856	SS-23	29	6.69	137	0.452	0.845	26.22	0.329
Mashi	Afadu	13.175	7.9594	SS-24	32	7.00	86	0.951	0.658	21.92	0.321
	Kafin	12.9832	7.9496	SS-25	30	6.89	95	0.852	0.789	24.48	0.212
	Kasanki	13.252	7.9796	SS-26	29	6.88	72	0.963	0.865	23.59	0.287
Sandamu	T'sadoji	12.9621	8.3591	SS-27	24	7.41	67	1.102	0.963	17.98	0.178
	Kagare	12.9623	8.4056	SS-28	26	7.36	85	1.002	1.222	18.67	0.196
Ingawa	Matallawa	12.782	8.1253	SS-29	29	7.51	75	1.020	1.062	20.14	0.231
	Dugul A	12.71	8.0679	SS-30	27	6.99	68	1.025	0.975	20.23	0.303
Musawa	Dankande	12.098	7.7659	SS-31	23	6.58	85	1.124	0.562	30.14	0.341
	Jikamshi	12.173	7.7685	SS-32	24	6.65	102	0.658	0.612	29.77	0.269
	Galadima	12.099	7.7683	SS-33	25	6.47	103	0.458	0.479	26.34	0.361
Jibia	AUMPS Daddara	13.0895	7.3940	SS-34	29	6.98	104	0.854	0.852	25.88	0258
Kankia	Kankia	12.5524	7.8111	SS-35	29	7.12	96	0.756	0.652	23.76	0.354
Zango	Garni	12.8601	8.5201	SS-36	30	.6.58	89	1.021	1.32	24.56	0.258
	Dargage	13.0583	8.4735	SS-38	29	6.67	98	0.974	1.86	23.58	0.348
Bakori	Kandarawa	11.756	7.3674	SS-39	22	6.56	91	1.021	0.685	26.24	0.231
	Kwantawaram	11.613	7.612	SS-40	18	7.23	83	0.695	0.596	24.74	0.24
	Makurdi	11.655	7.4862	SS-41	20	6.84	89	1.141	0.875	25.14	0.351
	Kabomo	11.601	7.4535	SS-42	20	6.45	87	0.658	0.852	26.52	0.236
	CGDSS Bakori	11.567	7.4345	SS-43	21	6.7	103	0.911	0.912	22.0	0.324

LGA	Sampling Location	Lat.	Long.	Sample Code	Temp ˚C	pH (mol/L)	Conductivity (Us/cm)	Pb (mg/kg)	Cr (mg/kg)	Fe (mg/kg)	Zn (mg/kg)
Kurfi	Kufan Agga	12.656	7.4897	SS-44	26	7.10	110	0.879	0.542	26.47	0.263
Funtua	Makera	11.53	7.2959	SS-45	18	7.9	75.5	0.656	0.365	27.21	0.369
	Bagari	11.541	7.3146	SS-46	16	7.6	21.8	0.785	0.469	23.58	0.298
	Ungwar Inji	11.4884	7.3096	SS-47	19	7.0	22.6	0.985	0.458	29.5	0.321
Daura	Sukwanawa	12.9283	8.28803	SS-48	30	6.93	35	1.102	0.823	22.24	0.286
	Kalgo Gari	13.0331	8.3259	SS-49	29	6.80	119	0.859	0.698	22.17	0.191
	Matawalle Ahmadu	13.024	8.32191	SS-50	31	6.95	98	0.985	0.722	25.2021.87	0.2907
	FSP Daura	13.038	8.34608	SS-51	28	7.32	86	1.002	0.354	21.89	0.196
	Kurneji	12.9422	8.32417	SS-52	30	7.8	87	1.120	0.658	22.22	0.373
FMEnv					**<40**	**6 – 9**	**1000**	-	-	**1500**	-

Annex 14E – Microbial Analysis of Soil Samples

LGA	Sampling Location	Coordinates	Code	E-Coli	Salmonella Spp	Bacillus Spp	Pseudomonas Spp
Musawa	Jikamshi	12.1733 7.7685	SS-32	2.61	5.12	3.56	12
Batagarwa	Kayauki	13.0100 7.7024	SS-01	2.84	11.11	4.22	24
Charanchi	Kadanya	12.3786 7.6992	SS-11	2.92	4.10	3.35	12
Bindawa	Bindawa	12.6680 7.8151	SS-07	4.92	9.34	7.53	14
Matazu	Kogari	12.4098 7.5300	SS-15	3.10	10.12	3.21	27
Mani	Bagiwa	12.8940 7.8856	SS-23	3.25	5.55	3.05	18.50
Sandamu	Kagare	12.9621 8.3591	SS-27	2.35	5.12	3.53	13
Jibia	AUMPS Daddara	13.0895 7.3940	SS-34	2.1	6.21	3.7	10
Bakori	CGDSS Bakori	11.5665 7.4345	SS-43	3.25	11.56	2.5	22.9
Ingawa	Matallawa1	12.7823 8.1253	SS-29	2.22	7.2	3.10	13.12

* Permissible limit for soil micro-organisms for FMEnv was not found

Annex 14F – Physicochemical and Heavy Metal Properties of Groundwater

LGA	Sampling Location	Lat.	Long.	Sample Code	pH (mol/L)	TDS (mg/l)	Conductivity (Us/cm)	Total Alkalinity (mg/l)	Hardness (mg/L)	NO3 (mg/L)	SO4 (mg/L)	Cl (mg/L)	Mg (mg/L)	Fe (mg/L)	Pb (mg/L)	Cr (mg/L)	Zn (mg/L)
Batagarawa	Kayauki	13.0100	7.7024	GW-01	7.4	174	363	207	186	12	50	30	0.1	0.24	0.003	0.00	0.12
	Jino	12.9385	7.5666	GW-02	6.8	154	236	102	95	12.4	30	40	0	0.12	0.005	0.01	0.23
	Dabaibayawa	12.8579	7.5819	GW-03	7.2	186	313	182	105	8.6	40	40	0.09	0.1	0.001	0.03	0.52
Baure	Bare	12.7945	8.9264	GW-04	6.8	139	222	158	87	8	60	40	0	0.1	0.002	0.01	0.32
	Maibara	12.8488	8.6454	GW-05	6.4	120	192	87	81	8.86	30	40	0	0.1	0.004	0.04	0.14
	Garki	12.8015	8.7841	GW-06	6.8	114	112	68	78	10	40	40	0	0.1	0.002	0.02	0.
Bindawa	Bindawa	12.6680	7.8151	GW-07	6.6	202	233	102	93	12.24	25	40	0.1	0.1	0.006	0.01	0.17
	Dan-Marke	12.6124	7.9915	GW-08	7	186	390	195	159	12	60	50	0	0.16	0.003	0.03	0.24
	Kiluki	12.7241	7.9514	GW-09	7.2	297	622	66	22	8.86	40	40	0	0.1	0.003	0.00	0.26
	Doro	12.7729	7.9113	GW-10	7.4	297	195	87	36	12	70	40	0	0.1	0.002	0.00	0.33
Charanchi	Kadanya	12.3786	7.6992	GW-11	6.6	154	232	97	103	12.98	30	60	0	0.1	0.005	0.02	0.52
	Dambuna	12.6274	7.7554	GW-12	7.4	249	479	222	227	12	70	30	0	0.13	0.002	0.01	0.55
Dutsinma	Yarima	12.4469	7.4958	GW-13	7.5	243	489	87	90	10.68	20	111	0	0.1	0.001	0.03	0.49
	Shema	12.5121	7.5379	GW-14	7.1	220	463	162	93	12.62	30	70	0	0.1	0.007	0.01	0.63
Matazu	Kogari	12.4098	7.5300	GW-15	7.3	238	614	123	76	12	30	80	0	0.12	0.005	0.03	0.10
Rimi	Sabon Gari	12.7431	7.7412	GW-16	6.4	119	251	120	21	7	35	60	0.09	0.1	0.003	0.01	0.81
	Rimin Guza	13.0165	7.7817	GW-17	6.8	140	298	66	69	8.86	50	30	0	0.1	0.005	0.00	0.09
	Sabon Garin	12.7431	7.7412	GW-18	6.6	120	248	78	78	10	40	40	0	0.2	0.001	0.00	0.46
Katsina	Shinkafi	13.0266	7.6421	GW-19	6.8	102	68	96	84	20.86	70	40	0	0.14	0.006	0.00	0.98
Kaita	Matsai	13.1734	7.6860	GW-20	6.8	61	128.3	90	96	5	20	30	0	0.12	0.008	0.00	0.62
	Dutsin	13.1769	7.6872	GW-21	5.5	142	299	52	126	5	10	20	0.1	0.1	0.009	0.01	0.74
	GDJPSS Kaita	13.0768	7.76278	GW-22	6.6	121	241	27	57	7	30	40	0	0.11	0.004	0.01	0.44
Mani	Bagiwa	12.8940	7.8856	GW-23	7.1	251	545	42	20	10	40	20	0	0.1	0.005	0.02	0.15
Mashi	Afadu	13.1747	7.9594	GW-24	6.2	56	110	18	16	8.86	30	40	0.1	0.1	0.002	0.00	0.27
	Kafin	12.9832	7.9496	GW-25	6.5	161	341	120	97	10	30	30	0	0.11	0.008	0.03	0.83
	Kasanki	13.2515	7.9796	GW-26	6.1	114	241	90	102	8.86	50	60	0	0.1	0.004	0.02	0.11
Sandamu	Tsadoji	12.9621	8.3591	GW-27	6	87	182	24	21	0	40	20	0	0.1	0.007	0.02	0.48
	Kagare	12.9623	8.4056	GW-28	6.4	125	168	66	35	0	30	30	0	0.1	0.005	0.02	0.90
Ingawa	Matallawa	12.7823	8.1253	GW-29	6.5	266	558	96	48	12.29	20	40	0	0.12	0.006	0.02	0.58
	Dugul A	12.7105	8.0679	GW-30	6.8	238	498	102	99	12.48	25	80	0	0.8	0.002	0.02	0.043
Musawa	Dankande	12.0983	7.7659	GW-31	7.2	124	261	111	72	3	90	80	0.02	0.1	0.004	0.00	0.49
	Jikamshi	12.1733	7.7685	GW-32	7.4	178	398	120	141	10	50	60	0.1	0.1	0.006	0.00	0.71
	Galadima	12.0990	7.7683	GW-33	7.7	200	441	240	135	8.86	70	60	0.04	0.1	0.005	0.01	0.62
Jibia	AUMPS Daddara	13.0895	7.3940	GW-34	6.1	284	598	90	120	20	20	70	0	0.14	0.003	0.01	0.08
	GJSS Daddara	12.5524	7.8111	GW-35	7.5	511	958	354	156	14	60	30	0	0.1	0.001	0.01	0.14
Zango	Garni	12.8601	8.5201	GW-36	6.5	589	758	120	97	8.86	50	40	0.1	0.1	0.002	0.03	0.091
	Dargage	13.0583	8.4735	GW-38	6.8	258	452	78	79	12.65	20	70	0	0.11	0.001	0.00	0.68
Bakori	Kandarawa	11.7559	7.3674	GW-39	6.4	120	192	87	81	8	30	40	0	0.1	0.002	0.00	0.80
	Kwantawaram	11.6128	7.6120	GW-40	7	303	542	98	162	12.2	20	60	0	0.1	0.002	0.02	0.16
	Makurdi	11.6550	7.4862	GW-41	6.8	78	165.2	114	51	6.62	20	40	0	0.2	0.006	0.01	0.52
	Kabomo	11.6006	7.4535	GW-42	6.7	211	548	152	65	12.9	40	60	0	0.1	0.005	0.01	0.43
	CGDSS Bakori	11.5665	7.4345	GW-43	6.7	154	285	132	60	8.9	30	50	0	0.1	0.002	0.00	0.36
Kurfi	Kufan Agga	12.6560	7.4897	GW-44	7.3	456	946	10	233	20	10	70	0.1	0.1	0.007	0.00	0.02
				FME Limit	**6.5-8.5**	**1000**	**1000**	**-**	**200**	**10**	**500**	**250**	**50**	**1.5**	**0.01**	**<1**	**3**

* Permissible limit for Alkalinity was not found for FMEnv, however the limit based on WHO has been provided.

Annex 14G – Microbial Analysis of Groundwater

LGA	Sampling Location	Coordinates	Code	Faecal Coliform	Enterobacter Aurogenes	Escherichia coli	Salmonella Spp	Pseudomonas Aurogenes
Musawa	Jikamshi	12.1733 7.7685	GW-32	32	9	19	2	0
Batagarwa	Kayauki	13.0100 7.7024	GW-01	4	1	4	3	0
Charanchi	Kadanya	12.3786 7.6992	GW-11	9	4	6	1	0
Bindawa	Bindawa	12.6680 7.8151	GW-07	8	4	5	1	0
Matazu	Kogari	12.4098 7.5300	GW-15	12	1	12	2	0
Mani	Bagiwa	12.8940 7.8856	GW-23	8	4	6	0	0
Sandamu	Kagare	12.9621 8.3591	GW-27	6	3	5	1	0
Jibia	AUMPS Daddara	13.0895 7.3940	GW-34	5	1	3	1	0
Bakori	CGDSS Bakori	11.5665 7.4345	GW-43	13	5	5	4	0
Ingawa	Matallawa	12.7823 8.1253	GW-29	2	1	1	0	0
WHO Limits				0	0	0	0	0

Annex 15 – Chain of Custody Form for Soil and Water Samples

Chain of Custody Form							
ADOLESCENT GIRLS INITIATIVE FOR LEARNING AND EMPOWERMENT							
Project Name: Preparation of Environmental and Social Management Plan (ESMP) for New Construction in 150 Schools under Katsina State AGILE							
State: KATSINA	**Zone: NORTH-WEST**	**LGA:**	**Location/Site:**				
Date: **Total Number of Samples:**							
Site Information				**Laboratory Information**			
Sample Collector				**Sample Receiver**			
Sample ID	**Coordinates**	**Time**	**Sign & Date**	**Sample ID**	**Name of Receiver**	**Sign & Date**	**Time**
Sample Collector Personnel Name:			**Client:**		**Lab Name:**		
Team Leader Name:			**Sign & Date:**		**Sign & Date:**		
Comment:			**Comment:**				

Annex 16 – Sample Outline for Security Management Plan

CHAPTER ONE: INTRODUCTION

- Introduction
- Objective of Security Management Plan (SMP)
- Guiding Principles

CHAPTER TWO: SECURITY POLICIES

- Federal Government
- State Government

CHAPTER THREE: GUIDELINES, STANDARDS AND GOOD INTERNATIONAL PRACTICES

CHAPTER FOUR: METHOD OF APPROACH FOR SMP

CHAPTER FIVE: OVERVIEW OF SECURITY SITUATION/ RISK ASSESSMENT

- Project Setting
- Security Risks
    1. Internal Risks
    2. External Risks
- Security Arrangements

CHAPTER SIX: SECURITY STRATEGY FOR STATE

- Planning and Preparedness
- Prevention
- Response

CHAPTER SEVEN: SECURITY OPERATING PROCEDURE FOR RAAMP STATE

- Boundary Security
- Access-Point Operations
- Incident Response and Reporting
- Security Patrols—what patrols check and how often.
- Security Clearance for Site Visits
- Materials Storage and Control
- Information and Communication—procedures for categorizing, handling, and controlling sensitive information.
- Firearms Security
- Special Situations

CHAPTER EIGHT: SECURITY SUPERVISION AND CONTROL

- Private Security Management
- Public Security

Annex 17A – Environmental and Social Impact Identification Checklist

Environmental and Social Assessment checklist for Construction Works in 150 Schools under Katsina State Adolescent Girls' Initiative for Learning and Empowerment (AGILE)

Name of School: _____
Address: _____ LGA: _____

PROPOSED ACTIVITIES					
No	Specific Activities	GPS Coordinate		Dimension	
		Latitude	Longitude	Length (m)	Breadth (m)

DESCRIPTION OF THE PROJECT ENVIRONMENT & DEMOGRAPHY

Tick the appropriate response
School Type: Girls Only Boys Only Mixed
Number of students: _____ Female; _____ Male
School Category: Boarding school Day School Both
Primary SSS JSS
Teachers: Permanent; ____; N/Power: ____ S/Power: ____ Part-Time: ____ Volunteers: __
Affected Vegetation: Full grown trees shrubs
Staff Quarters: Yes / No *(Describe: _____)*

Soil Type: Heavily silted Compact soil Lateritic soil
Topography: Even or Uneven Perimeter Fence: Yes or No;
Estimated proximity of community to school: _____ m
Is there enough Access Road to the site (school) for construction vehicles? YES OR NO
Water Source: Borehole / Well / None
Are there farmlands within the school premises: Yes / No; If yes, do the farmers use fertilizers? Yes or No
Environment: Urban (Built-up) / Rural
Waste Management structures: Yes / No. If yes, specify: Local incinerator / collective dumpsite or waste bin
(Take GPS point of waste management structure: Lat: _____; Long: _____)
Is there visible erosion issues within the school? YES / NO
If yes, Take pictures and GPS (Lat: _____; Long: _____)
Flood prone: Yes / No; Drainage System: Yes / No; Previous or observable erosion issues: Yes / No
Is there a river or water body flowing nearby or through the school? YES or NO
If Yes; Name of River/stream: _____ Use of river: _____
(Take sample and GPS coordinate of the river/stream)
What types of vegetation are prominent within the school? List
_____
_____
Nearby Public facilities such as religious centres, public health facilities, markets? YES or NO
If Yes, provide details: (Proximity to school: _____m; Pictures: _____;
GPS: Lat:_____; Long:_____)
Is there envisaged traffic build-up? YES or NO; if Yes, what is the reason: _____

Will there be acquisition (temporarily or permanently) of land (public or private) for its development: Yes / No
(IF YES, PLEASE USE THE SCOPING CHECKLIST FOR ESS 5)
Who owns the land? The government / An individual / Donated to the school (if donated, specify who donated)
Are there any form of activities (temporary/permanent)? Farmland / Kiosk (shop) / others *(specify):*
_____
Who is carrying out the activities? Teacher or Staff / Outsider (Community member) / Not Applicable
Removal/Clearing of vegetation: Yes / No; Types & number of Affected vegetation (trees):
_____
_____
(IF YES, PLEASE USE THE SCOPING CHECKLIST FOR ESS 5)
Is there sufficient land area within the school premises? Yes / No
If Yes, what is the estimated land dimension: Length: _____ m; Breadth: _____ m
Will the land require sand filling? Yes / No; Potential for water logging: Yes / No
Require mobilization of heavy-duty vehicles? Yes / No
Can the contractor's vehicle gain access easily to the proposed construction area? Yes / No

Will any structure such as building, drainage, water lines (pipes), walkways, electric poles, trees, etc. be affected for the Contractor to move equipment to the proposed site? Yes / No *(if others, specify)*
_____
Are there any environmentally and culturally sensitive areas within 250m? Yes / No
If yes, specify: _____
Are there students with disabilities in the school? Yes / No. If yes, give details: _____
Are there potential security issues within the community? Yes / No. If yes, give details: _____
How is grievance or complaints addressed in the school?
_____
_____
Other Items:

Item	Address	Latitude	Longitude
Proposed Borrow Pit			
Proposed Contractor's Campsite			

Name of Enumerator: _____
Phone Number: _____
Date: _____

Annex 17B – Scoping Checklist for Land Acquisition, Restriction of Land Use and Involuntary Resettlement

- Project Title: _____
- State: _____ Local Government Area: _____
- Project Community: _____
- School Name: _____
- School Address: _____

S/N	Activity	Responses/Remarks
1	Minimum land area (width) required for the proposed development (meters)	
2	Available total land area (width) within the identified location (meters)	
3	Does the project involve any land acquisition	**Yes No**
4	Does the project involve transfer/alienation of government land	
5	Will the land be acquired through negotiations (willing buyer willing seller principle) without invoking land acquisition policy	
6	Are there any environmentally and culturally sensitive areas within 250m?	
7	Any historic, archaeological reserve, ancient or protected monument, graveyards, temples, shrines within the minimum land area (width) required	
8	Need to open new, temporary or permanent, access roads?	
9	Any acquisition (temporarily or permanently) of land (public or private) for the development	
10	Is there any potential for land dispute, assets and livelihoods displacement?	
11	Involuntary restriction of access by people to legally designated parks and protected areas	
12	Is there any encroachments/squatting in the government land / project area	
13	Is there likely to be any impact to agricultural tenants, share croppers	

14 Will there be loss of crops, trees, wells, other assets
15 Will there be loss of income and livelihoods
16 Will there be loss of business or enterprise
17 Will there be any social or economic activity that will be affected by land use related change
18 Overall Observation and Recommendations

19	Name of the officer completed the form (From the SPIU)	
20	Designation and contact Information	
21	List of team members	
22	Overall observation and recommendation from the team	
23	Name and Contact Information of Project Coordinator	
24	Remarks of Project Coordinator	
25	Signature and Date	

Annex 18 – List of Schools Visited

S/N	NAMES OF SCHOOLS	LGA
1	Comm Arabic Jnr Sec Sch. Kogari	MATAZU
2	Rinjin Idi Primary School.	MATAZU
3	Dankande Comm Sec Sch Kurkujan	MUSAWA
4	Comm Day Sec Sch Magami	MANI
5	Makau Nomadic Primary School	MANI
6	Tsagem Primary School	MANI
7	Govt Jnr Sec Sch K/Arewa	MANI
8	Bagiwa Primary School	MASHI
9	Tagura Primary School	MASHI
10	Govt Jnr Sec Sch Kasanki	MASHI
11	Afadu Primary School	MASHI
12	Kasanki Primary School	MASHI
13	Rimin Guza Primary School	RIMI
14	Comm Day Jnr Sec Sch Kadandani	RIMI
15	Majen Gobir Primary School	RIMI
16	Majen Gobir Primary Sch	RIMI
17	Sabon Gari Primary School	RIMI
18	Kadanya Primary School	CHARANCHI
19	Bebeji Primary School	CHARANCHI
20	Tsaski Comm Day Jnr Sec Sch	CHARANCHI
21	Dambuna Primary School	CHARANCHI
22	GPJSS, Dambuna	CHARANCHI
23	Makurdi A Primary School	BAKORI
24	Kwantakwaram Primary School	BAKORI
25	Kandarawa Primary School	BAKORI
26	Kabomo Comm College	BAKORI
27	Comm Girls Day Sec Sch Bakori	BAKORI
28	Makwalla Primary School	FUNTUA
29	Unguwar Inji Primary School	FUNTUA
30	Govt Jnr Sec Sch Makera	FUNTUA
31	Bagari Primary School	FUNTUA
32	Govt Day Sec Sch Tudun-Iya	FUNTUA
33	Magam Primary School	KANKIA
34	Dannayaki Primary School	KANKIA
35	Kayauki Primary School	BATAGARAWA
36	Comm Jnr Sec Sch Kayauki	BATAGARAWA
37	Govt Sci. Jnr Sec Sch Batagarawa	BATAGARAWA
38	Jino Primary School	BATAGARAWA
39	Dabaibayawa Primary School	BATAGARAWA
40	Wagini Model Primary School	BATSARI
41	Government Pilot Junior Secondary School Madogara	BATSARI
42	Pilot Junior Secondary School Shirgi	BATSARI
43	Kurneji Primary School	DAURA
44	Matawalle Ahmadu Primary School	DAURA
45	Sukwanawa Primary School	DAURA
46	Fsp Jnr Sec Sch Daura	DAURA
47	Govt Jnr Sec Sch Ganga	DANJA
48	Govt Jnr Sec Sch Danja	DANJA
49	Govt Jnr Sec Sch Dabai	DANJA
50	Buzaye Primary School	DANJA
51	Tsangamawa Primary School	DANJA
52	Comm Day Sec Sch Yamel	DUSTI
53	Minawa Nomadic Primary School	DUSTI
54	Yamel Primary School	DUSTI
55	Govt Jnr Sec Sch Dan-Aunai	DUSTI
56	Sabon Garin Safana Primary School	DUSTIN MA
57	Comm Day Jnr Sec Sch Dage Lawal	DUSTIN MA
58	Ggovt Jnr Sec Sch Shema	DUSTIN MA
59	Yarima Pilot Day Secondary School	DUSTIN MA
60	Faguwa Primary School	DUSTIN MA
61	Govt Jnr Sec Sch Bindawa	BINDAWA
62	Dan-Marke Primary School	BINDAWA
63	Govt Jnr Sec Sch Doro	BINDAWA
64	Kiluki Santar Gawo Primary School	BINDAWA
65	Dandire Primary School	DAN MUSA

S/N	NAMES OF SCHOOLS	LGA
66	Madawa Primary Sch	DAN MUSA
67	Govt Jnr Sec Sch Danmusa	DAN MUSA
68	Govt Jnr Sec Sch Yantumaki	DAN MUSA
69	Govt Jnr Sec Sch Kadisau	FASKARI
70	Bilbis Primary School	FASKARI
71	Unguwar Ali Primary School	FASKARI
72	Mununu Primary School	FASKARI
73	Ummarun Dallaje Memorial Primary School	KATSINA
74	Govt Jnr Sec Sch Dutsen Safe	KATSINA
75	Shinkafi Comm. Jnr Sec. Sch	KATSINA
76	Dan Nabaso Primary School	KATSINA
77	Mohammed Dodo Ibrahim Sci. Model Primary School	KATSINA
78	Dantutture Primary School	KAFUR
79	Kagara Primary School	KAFUR
80	Huguma Primary School	KAFUR
81	Jofalawa Primary School	KUSADA
82	Kafarda Primary School	KUSADA
83	Govt Jnr Sec Sch Karkarku	INGAWA
84	Dugul A Primary School	INGAWA
85	Daunaka Model Primary School	INGAWA
86	Comm Day Sec Sch Labi	SABUWA
87	Government Jnr Sec Sch Damari	SABUWA
88	Maigari Primary Sch	MAIADUA
89	Dagura Primary School	MAIADUA
90	Mai-Jaura Primary School	SAFANA
91	Comm Day Sec Sch Kunamawa	SAFANA
92	Tafashiya Primary Sch	KANKIA
93	Magam Primary School	KANKIA
94	Dannayaki Primary School	KANKIA
95	Garin Jita Primary School	JIBIA
96	Kadobe Primary School	JIBIA
97	Ali Usman Model Primary School	JIBIA
98	Govt Jnr Sec Sch Jibia	JIBIA
99	Govt Jnr Sec Sch Daddara	JIBIA
100	Damzaki Primary School	MALUMFASHI
101	Burdugau Primary School	MALUMFASHI
102	Almakiyayi Primary School	MALUMFASHI
103	Govt Jnr Sec Sch Gora	MALUMFASHI
104	Almakiyayi Primary Sch	MALUMFASHI
105	Unguwarrai Primary School	BAURE
106	Bare Primary School	BAURE
107	Maibara Primary School	BAURE
108	Unguwar Tofa Primary School	KANKARA
109	U. K. Bello Primary School	KANKARA
110	Yargoje Model Primary School	KANKARA
111	Govt Jnr Sec Sch Ketare	KANKARA
112	Comm Day Sec Sch Yargoje	KANKARA
113	Garni Primary School	ZANGO
114	Shuaibu Abubakar Primary School	ZANGO
115	Comm J Sec Sch Dargage	ZANGO
116	Dutsin Safe Primary School	KAITA
117	Kafin Mashi Primary School	KAITA
118	Matsai Model Primary School	KAITA
119	Ggovt Jnr Sec Sch Dutsin Safe	KAITA
120	Govt Jnr Sec Sch Dankaba.	KAITA
121	Sirika Nomadic Primary School	DUTSI
122	Jikamshi Kusada Government Pilot	MUSAWA
123	Pilot JSS Kafarda	KUSADA
124	Musawa Community Day Secondary	MUSAWA
125	Government Day Secondary School, Tudun Iya,	TUDIN IYA
126	Government Secondary School	DUTSINMA

Annex 19 – List of Communities Visited

S/N	COMMUNITIES	LGA	Latitude	Longitude
	KOGARI	MATAZU	12.2109	7.765823
	RINJIN IDI	MATAZU	12.18485	7.634451
	TSAGEM	MANI	12.95302	7.825115
	BAGIWA	MASHI	12.89397	7.885601
	TAGURA	MASHI	13.03753	7.904558
	KADANDANI	RIMI	12.74509	7.684343
	SABON GARI	RIMI	12.74312	7.741184
	KADANYA	CHARANCHI	12.37861	7.699168
	TSASKI	CHARANCHI	12.70999	7.715252
	DAMBUNA	CHARANCHI	12.62738	7.755394
	KWANTAKWARAM	BAKORI	11.61283	7.611965
	KANDARAWA	BAKORI	11.75595	7.367407
	KOBOMO	BAKORI	11.60064	7.453498
	UNGUWAR INJI	FUNTUA	11.6724	7.185276
	TUDUN IYA	FUNTUA	11.35569	7.348214
	MAGAM	KANKIA	12.32748	7.702972
	DAN NAYAKI	KANKIA	12.61092	7.783458
	KAYAUKI	BATAGARAWA	13.00996	7.702359
	BATAGARAWA	BATAGARAWA	12.90044	7.618736
	SHIRGI	BATSARI	12.74675	7.327496
	DAURA	DAURA	13.03804	8.346083
	TSANGAMAWA	DANJA	11.36731	7.531645
	YAMEL	DUSTI	12.88744	8.104537
	MINAWA	DUSTI	12.86194	8.237483
	YAMEL	DUSTI	12.88744	8.104537
	DAN AUNI	DUSTI	12.88914	8.191609
	DAGE LAWAL	DUSTIN MA	12.40981	7.530036
	SHEMA	DUSTIN MA	12.51213	7.537902
	BINDAWA	BINDAWA	12.668	7.815111
	DAN MARKE	BINDAWA	12.61236	7.991493
	DANDIRE	DAN MUSA	12.45018	7.482104
	MADAWA	DAN MUSA	12.95089	7.632768
	DUTSEN SAFE	KATSINA	13.00875	7.586781
	SHINKAFI	KATSINA	13.02662	7.642126
	KAGARA	KAFUR	11.66447	7.836958
	HUGUMA	KAFUR	11.783262	7.555140
	JOFALAWA	KUSADA	12.56411	7.966534
	KAFARDA	KUSADA	12.43032	8.021789
	KARKARKU	INGAWA	12.66042	8.104263
	DUGUL A	INGAWA	12.71049	8.067904
	LABI	SABUWA	11.25996	7.025503
	DAMARI	SABUWA	11.38909	7.098998
	MAIGARI	MAIADUA	13.12452	8.23176
	DAGURA	MAIADUA	13.20829	8.182917
	MAI JAURA	SAFANA	12.35758	7.360383
	KUNAMAWA	SAFANA	12.36381	7.380739
	TAFASHIYA	KANKIA	12.50673	7.80713
	MAGAM	KANKIA	12.32748	7.702972
	DAN NAYAKI	KANKIA	12.61092	7.783458
	JIBIA	JIBIA	13.08456	7.224941
	DADDARA	JIBIA	13.09010	7.393674
	ALMAKIYAYI	MALUMFASHI	11.88123	7.65773
	GORA	MALUMFASHI	11.91458	7.66578
	ALMAKIYAYI	MALUMFASHI	11.88123	7.65773
	UNGUWAR RAI	BAURE	11.64375	7.33281
	UNGUWAR TOFA	KANKARA	12.711442	7.93569
	YAR GOJE	KANKARA	11.86685	7.475456
	DARGAGE	ZANGO	13.02550	8.451381
	DUTSEN SAFE	KAITA	13.070891	7.616376
	DANKABA	KAITA	13.203619	7.73599
	SIRIKA	DUTSI	12.86194	8.237483
	MATALLAWA	INGAWA	13.02401	8.321907