



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

Appraisal Stage | Date Prepared/Updated: 23-Jan-2023 | Report No: PIDISDSA35300

BASIC INFORMATION

A. Basic Project Data

Country Zambia	Project ID P180401	Project Name Zambia Education Enhancement Project Second Additional Financing	Parent Project ID (if any) P158570
Parent Project Name Zambia Education Enhancement Project	Region EASTERN AND SOUTHERN AFRICA	Estimated Appraisal Date 19-Jan-2023	Estimated Board Date 09-Mar-2023
Practice Area (Lead) Education	Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance	Implementing Agency Ministry of Education

Proposed Development Objective(s) Parent

The project development objective is to improve the quality of teaching and learning in mathematics and science in targeted primary and secondary schools and to increase equitable access to secondary education.

Components

Improving the quality of teaching and learning conditions in language arts, science, and mathematics in targeted primary and secondary schools
 Increasing access to safe secondary schools
 Strengthening institutional capacity for education service delivery and project management
 Enhancing institutional capacity for implementation of safe school program
 Contingent Emergency Response Component

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	53.00
Total Financing	53.00
of which IBRD/IDA	53.00
Financing Gap	0.00

DETAILS



World Bank Group Financing

International Development Association (IDA)	53.00
IDA Credit	53.00

Environmental Assessment Category

B-Partial Assessment

'Have the Safeguards oversight and clearance function been transferred to the Practice Manager?' No

Decision

The review did authorize the team to appraise and negotiate

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Other Decision (as needed)



B. Introduction and Context

Country Context

- Zambia's Government has an ambitious reform agenda as reflected in the 8th National Development Plan, whose theme is socio-economic transformation of improved livelihoods.** So far, several reforms have been undertaken, including in the education sector.
- Zambia faces high levels of poverty with a population that is young and fast-growing.** According to 2022 estimates, Zambia's poverty rate has increased; using the new international poverty line of US\$2.15, Zambia's poverty rate is 62 percent, up from 58.7 percent in 2015.¹ Similarly, real gross domestic product (GDP) per capita has declined from US\$1,340 in 2015 to US\$1,019 in 2021. Zambia's population is estimated at 19.5 million², with a median age of 17.5 years and 80 percent of the population under the age of 35.³ The annual population growth rate is 2.8 percent, with the population expected to double by 2050.
- Zambia's economic growth has been slow in recent years, with sluggishness starting before the COVID-19 pandemic and recent encouraging signs of economic recovery.** Between 2015 and 2021, real GDP growth averaged 2.5 percent per year, compared to 7.4 percent between 2004-2014 with the economy projected to grow at 3.9 percent and 4.1 percent in 2023 and 2024. In August 2022, the International Monetary Fund Board approved SDR978.2 million (about US\$ 1.3 billion) in a 38-month Extended Credit Facility Arrangement aiming to further restore macroeconomic stability and foster higher, more resilient, and more inclusive growth.
- Climate change poses challenges to Zambia's development.** The country has a highly variable climate in the form of droughts, seasonal and flash floods, and extreme temperatures. Some of these hazards, especially droughts and floods, have increased in frequency and intensity adversely impacting food and water security and rural livelihoods. Approximately 1.5 million people are currently susceptible to the impacts of climate change, ranging from prolonged dry spells to heavy rains and floods. Heavy rainfall and flash flooding events have resulted in casualties and damage throughout Zambia. Rainfall is expected to increase by up to 4 percent in the northern regions but decrease by as much as 5 percent in the southern regions.
- Zambia's human capital is very low according to the Human Capital Index (HCI), lower than those of its comparator countries.** An HCI score of 0.4 indicates that a Zambian child born in 2020 will only be 40 percent as productive as she could have been had she received a complete education and been in full health. By age 18, children in Zambia can expect to complete an average of 8.8 years of education but acquire only 5 years of learning.⁴ Low human capital has significant adverse impacts on Zambia's growth potential and global competitiveness. It is therefore critical for the country to quickly move the needle on human capital development.

Sectoral and Institutional Context

- Zambia's education sector has faced challenges in providing efficient and equitable access to good quality education services to a growing population.** The country has made progress in achieving near universal access to primary education, with more than 85 percent primary completion rate. However, secondary school coverage has fallen since 2010 with the gross enrollment ratio for secondary education at 68 percent among boys and just 62 percent among girls.⁵ To achieve the Sustainable Development Goal on quality education, improved investments in the education sector are needed to address core challenges facing the sector.
- Education access for Zambia's youth is impacted by inadequate infrastructure capacity to meet the increased demand for education services.** Currently, available school places at the secondary level prevent many from access and

progression through the secondary education system, which encompasses junior secondary (Grades 8 and 9) and senior secondary (Grades 10, 11, and 12). Available space at the junior secondary level accommodate only two thirds of those who complete grade 7. Only half of students who complete junior secondary can be accommodated into spaces at the senior secondary level. This means that many are left out of the system as they progress into and through secondary education due to a lack of adequate school space. This lack of sufficient schools and limited school spaces also means that the distance from home to school is an access constraint to secondary education for many, particularly girls.

8. **High levels of learning poverty⁶ and poor learning outcomes are evident at all education levels.** Zambia has one of the highest levels of learning poverty globally, estimated at 98.5 percent. Learning outcomes in science, technology, engineering, and mathematics subjects are particularly low. According to the 2018 Program for International Student Assessment for Development results, Zambian students performed worse than their peers, with 2 percent of the students tested exhibiting acceptable minimum competencies in science, and 5 percent in reading. Due to COVID-19 related school closures, both learning poverty and poor learning outcomes are feared to have worsened.⁷

9. **There is a recent history of low budget allocations to finance education activities.** Between 2015 and 2022, the education sector experienced a sharp and continuous decline in the share of the national budget it received, from 20.5 percent in 2015 to 10.4 percent in 2022. This sharp decline has had serious implications on the performance of the education system, including a deterioration in the capacity to undertake curriculum support activities (such as monitoring and inspections of schools), to provide teaching and learning materials, and for continuous professional development for teachers. Additionally, there have been delays in the provision of school grants,⁸ although there are some recent improvements in education financing in the last budget cycle.

10. **There is a widespread shortage of teaching and learning materials and appropriate school infrastructure.** The pupil textbook ratio is high in most schools; on average, one textbook is shared by five pupils at the primary and secondary level, with the ratio often higher in rural schools. Additionally, between 40-60 percent of schools lack appropriate infrastructure to support teaching and learning, including a lack of science laboratories, libraries, and computer labs. At times, schools lack even the basic infrastructure necessary for well-functioning schools, such as a power supply, water reticulation, water, sanitation and hygiene facilities, and furniture.

11. **There is a shortage and uneven distribution of teachers, particularly at the primary level, with evidence of low pedagogical skills of those in the system.** Current practices for teacher recruitment, deployment, transfers, and career progression along with a lack of consistent adherence to teacher management regulations, have led to wide disparities in the pupil-teacher ratio (PTR) across schools and payroll mismatches,⁹ with high attrition rates for teachers in rural and remote areas.¹⁰ Though the national aggregate PTR is 44:1, there are large differences across schools, with some schools having a PTR below 30 and others a PTR of over 100.¹¹ This has a negative impact on the quality of teaching

¹ World Bank estimates (2022).

² UNFPA data, 2022 (<https://www.unfpa.org/data/world-population/ZM>).

³ Estimates from Zambia Statistical Agency (2021).

⁴ World Bank. 2020. The Human Capital Index 2020 Update: Human Capital in the Time of COVID-19. World Bank, Washington, DC. <https://openknowledge.worldbank.org/handle/10986/34432>.

⁵ Living Conditions Monitoring Survey (LCMS) 2015.

⁶ World Bank, 2022. The State of Global Learning Poverty: 2022 Update. Conference Edition, June 2022. According to the World Bank state of the global learning report, learning poverty refers to children who cannot read a simple text with comprehension by age 10.

⁷ Updated 2022 World Bank report on state of learning poverty, World Bank, and 2022 UNESCO report on Monitoring Impacts on Learning Outcomes.

⁸ Public expenditure review (PER) 2022, World Bank upcoming report.

⁹ Payroll mismatch occurs when the school through which a teacher's salary is paid is not the same school in which they teach. As many as 60 percent of Zambia's teaching workforce is teaching in the 'wrong' school' (Auditor General's Report, 2014).

¹⁰ A school is considered remote if it is located over 15 km from the nearest district center.

¹¹ Innovations for Poverty Action. 2017. *Teaching Staff Imbalances across Public Schools in Zambia*.



and learning, particularly in the most remote areas. There is evidence of teaching staff lacking adequate subject knowledge and skills to teach effectively.¹²

12. **Large disparities in educational outcomes by gender, income level, and geographic location are present across Zambia.** While Zambia has achieved gender parity in primary education, the ratio of girls to boys is 85 percent at the secondary level, with 36 percent of girls in the 14–18 year age-group estimated to be out of school, compared to only 19 percent of boys. Additionally, starting in Grade 7 girls drop out at higher rates than boys, especially in rural areas, due primarily to pregnancy and early marriage. Two-thirds of students who enter secondary education are from households in the two wealthiest quintiles. By contrast, just 18 percent of children from households in the two poorest quintiles enter secondary education. Moreover, students from lower-income households and girls exhibit significant learning gaps across education levels.¹³

13. **Violence, including school related gender-based violence (SRGBV), teen pregnancy, child marriage and poverty are major obstacles to educational attainment among girls.** Analysis shows that early pregnancy (47 percent), child marriage (13 percent), and economic constraints (18 percent), are major reasons why adolescent girls drop out of school.¹⁴ Social norms seem to accept violence, particularly against women, with 47 percent of women in Zambia agreeing that a husband/partner is justified to beat his wife under certain circumstances.¹⁵ Small-scale studies have documented high levels of GBV in schools in Zambia.

14. **The Government has prioritized human capital development and education in the past year.** The Government is increasing investments and repositioning the education sector to ensure students have the required skills and competencies for the 21st century. Several reforms have been instituted in the past year, including the recruitment of over 30,000 teachers, an increase of financing for school grants, and the implementation of the education for all policy, which provides free education for all, including secondary education students. In addition, the national budget allocation to education increased from 10.4 percent in 2022 to 13.9 percent in 2023; these funds include financing for the completion of overdue education construction projects.

C. Proposed Development Objective(s)

Original PDO

The project development objective is to improve the quality of teaching and learning in mathematics and science in targeted primary and secondary schools and to increase equitable access to secondary education.

Current PDO

The project development objective is to improve the quality of teaching and learning conditions in targeted primary and secondary schools and to increase access to secondary education focusing on girls.

Key Results

15. **As with the first Additional Financing (AF) of the Zambia Education Enhancement Project (ZEEP), this second AF will directly benefit approximately 1.5 million children in almost 2,700 public primary and secondary schools**

¹² Examination Council of Zambia, 2021 national assessment

¹³ Zambia Statistical Agency, Zambia Demographic and Health Survey, 2018.

¹⁴ 2019 analysis of EMIS data.

¹⁵ OECD (Organization for Economic Co-operation and Development). 2019. "Violence Against Women (indicator)." doi: 10.1787/f1eb4876-en (Accessed on October 23, 2019).



across 70 districts, which are poorer and have low educational outcomes across all 10 provinces. The project seeks to make improvements in the number of:

1. Students benefiting from direct interventions to enhance learning
 - a. Students benefiting from direct interventions to enhance learning - Female
2. Teachers achieving increased competences in subject and pedagogical content knowledge in mathematics, science and language arts as prescribed in curriculum (disaggregated by education level)
3. Targeted primary and secondary schools with 3:1 (or better) student textbook ratio in language arts, mathematics and science (physics, chemistry, biology, agricultural/home economics) in target schools
4. Students enrolled in Grades 8–12 in the expanded secondary schools with additional classrooms and facilities
 - a. Students enrolled in Grades 8–12 in the expanded secondary schools with additional classrooms and facilities – Female

D. Project Description

16. **The second AF will be specifically used to cover a cost overrun caused by a change in the design of the school construction package supported by the project, which was not anticipated at appraisal.** The change in design is due to a shift in the Government prioritization of the education sector and the interest in ensuring new secondary schools can prepare students for 21st century skills.

17. **The project remains focused on increasing equitable access to secondary education and improving learning conditions both at primary and secondary levels, particularly for girls.** The Project Development Objective (PDO), geographic coverage, number of beneficiaries to be supported by project interventions and closing date remain unchanged. Furthermore, the project continues to focus on addressing “Learning Poverty” and the creation of safe and conducive learning environments, particularly for girls.

18. **All project components and sub-components continue to be supported by the project.** Component 1: Improving the quality of teaching and learning conditions in language arts, science, and mathematics, in targeted primary and junior secondary schools, will continue to support enhancing teacher competencies, increasing the availability of teaching and learning materials, and improving teacher recruitment, deployment and management. Component 2: Increasing access to safe secondary schools, will continue to support construction of safe secondary schools. Component 3: Strengthening institutional capacity for education service delivery and project management, will continue to support improvements in terms of system management and project coordination. Component 4: Enhancing institutional capacity for implementation of safe school program, will continue to support schools in the development and implementation of safe school plans. The project will continue to include Component 5: Contingent Emergency Response Component (CERC).

19. **The key changes introduced by this second AF focus on the type and amount of support provided for specific activities.** The changes involve: (i) revision to the construction package to align with to the Government of the Republic of Zambia’s (GRZ’s) new education reform priorities and school infrastructure standards; (ii) revision of some activities, especially those which have been or will be implemented with support by the GRZ budget and recent reforms; (iii) re-allocation of financing across project categories and components to meet cost overrun arising from alignment to new school construction design changes not anticipated at appraisal; and (iv) revision of targets and values of intermediate result indicators and performance-based conditions (formerly known as disbursement-linked indicators) to reflect changes in project activities.



20. **This second AF and restructuring support enhancements to the school construction package for the 120 schools supported by the project's first AF and aligns the project to the GRZ priorities.** The changes introduced by this second AF focus on improving the quality of teaching and learning conditions through improved education facilities that promote learning for 21st century skills, including adequate classrooms (including Information and Communication Technology, ICT) necessary to teach the curriculum, science laboratories, examination halls, and accommodation for teachers, especially in rural areas. In addition, the project supports other activities to complement the GRZ national efforts to improve education outcomes through initiatives such as the recruitment of 30,000 teachers in 2021 and the development of ICT infrastructure in schools through the Smart Zambia Initiative.

E. Implementation

Institutional and Implementation Arrangements

21. **The implementation arrangements for the project will be enhanced with this AF.** The MoE will continue to have full responsibility and accountability for project implementation through relevant directorates, departments, and agencies. The Provincial Education Offices and District Education Board Secretaries will continue to play the key role of facilitating and monitoring of project implementation.
22. **Project implementation will be coordinated and supported through the Zambia Education Program Coordination Unit (ZEPCU)** that will manage both the ZEEP and the Zambia Enhancing Early Learning Project for which the World Bank is the grant agent. Staffing and support from ZEPCU will be amended to adequately address project needs.
23. **The project will maintain a Project Steering Committee (PSC) and Project Implementation Committee (PIC).** To help address delays in implementation and project performance, some changes will be introduced to the PSC and PIC through the second AF and restructuring.

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

The project will continue to be implemented in 70 districts across 10 provinces of Zambia. The intervention districts remain as those selected during the parent ZEEP and first AF using a composite index. Central (8) Chibombo, Chisamba, Itezhi-Tezhi, Luano, Mkushi, Mumbwa, Ngabwe, Serenje Copperbelt (2) Lufwanyama, Mpongwe Eastern (8) Chadiza, Chipata, Katete, Lundazi, Nyimba, Petauke, Sinda, Vubwi Luapula (8) Chiengi, Kawambwa, Lunga, Milenge, Mwansabombwe, Mwense, Nchelenge, Samfya Lusaka (2) Chirundu, Rufunsa Muchinga (6) Chirundu, Rufunsa, Isoka, Mafinga, Mpika, Shiwang'andu Northern (9) Chilubi, Lunte, Luwingu, Mbala, Mporokoso, Mpulungu, Mungwi, Nsama, Senga North-Western (4) Chavuma, Kabompo, Kasempa, Mufumbwe Southern (11) Chikakanta, Choma, Gwembe, Kalomo, Kazungula, Monze, Namwala, Pemba, Siavonga, Sinazongwe, Zimba Western (12) Kalabo, Luampa, Lukulu, Mitete, Mwandu, Nalolo, Nkeyema, Senanga, Sesheke, Shang'ombo, Sikongo, Sioma. In terms of physical characteristics, Zambia's topography has 3 main features consisting of mountains, a plateau & lowlands with most areas lying on a flat plateau. Vegetation cover in most parts of Zambia is mainly savannah woodlands in high rainfall regions and tropical grasslands in low rainfall regions. The construction of additional classrooms and support facilities in selected schools is likely to result in dust emissions and generation of waste during the construction phase. The additional facilities are expected to be built within existing beneficiary schools, within existing school



perimeters, where land is already allocated to the school and there is no encroachment. For this reason, a separate Resettlement Policy Framework is not required. However, an ESMF was updated in line with World Bank policy on environmental assessment OP4.01 and includes specific site screening procedures that documents development agreements with stakeholders and communities in order to comply with World Bank Operational Policies. The ESMF site screening will be used to assess the environmental and social risks associated with the project and eliminate any construction activities that would necessitate displacement of squatters, encroachers or require land acquisition.

G. Environmental and Social Safeguards Specialists on the Team

Nicole Andrea Maywah, Environmental Specialist
Min Ji Sohn, Environmental Specialist
Joy Lubinda Chisompola, Social Specialist

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SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	
Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats OP/BP 4.04	No	
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	No	
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	No	
Safety of Dams OP/BP 4.37	No	
Projects on International Waterways OP/BP 7.50	No	
Projects in Disputed Areas OP/BP 7.60	No	



KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

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

During the implementation of the project and associated sub-projects, preparation, construction and operational activities could have environmental and social impacts from generation of general and construction waste, surface and ground water contamination, elevated dust and incinerator emission levels, generation of electronic wastes (from tablets and used batteries from solar panels), increased safety and security risks for community and staff/learners, etc. However, construction of classrooms and associated facilities under the project will be done within existing school premises for which land has already been allocated for the purposes, and no proposed activities funded under the project can be classified as large scale, high significant and irreversible.

The additional construction of science laboratories and computer laboratories includes potential downstream adverse issues including chemical spills, accidents in science laboratories, ineffective e-waste management, etc.

In terms of Gender-Based Violence (GBV), a GBV risk assessment was conducted in order to assess the GBV risk. The assessment classified the GBV risk as moderate. The Project will ensure guidelines provided in the World Bank GBV Good Note Practice are adhered to. Further, GBV will be mitigated through the MoE's school related GBV (SRGBV) Action Plan, and the implementation of the safe school program to be supported by the project, and the GBV National Action Plan.

Due to increased activities under component 2, the Environmental and Social Management Framework (ESMF) will ensure that there is strengthened monitoring and training on Gender Based Violence/Sexual Exploitation and Abuse (GBV/SEA). The Grievance Redress Mechanism (GRM) developed for the project will be strengthened to include structures that record and analyze project-related complaints and refer non-project-related grievances to relevant authorities, including government and nongovernmental agencies.

The project has faced challenges in the implementation of the GRM in both the Parent and first AF due to low institutional capacity; however, recommendations for recruitment of key PIU staff was given. Hence, to strengthen GRM implementation and monitoring, the project is in the process of recruiting a Social and GBV Expert. The staff recruited will enforce and monitor identified risks and impacts as well as mitigation measures that have been included in the ESMF, as well as site-specific Environmental and Social Management Plans (ESMPs). Furthermore, trainings on the GRM and GBV will be conducted at provincial, district and community levels.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: The environmental and social risks associated with the construction of additional classrooms and generation of electronic wastes in beneficiary schools are of low significance and will be restricted to the school premises. The supply of electronics for additional science and computer laboratories will lead to the generation of electronic wastes which could degrade the environment if poorly disposed. A generic ESMP has been prepared as part of the ESMF update and will guide mitigation measures related to construction of the facilities mentioned. An E-waste management plan has also been prepared as part of the updated ESMF.

However, the long-term impacts in the community will result in high literacy rates and more career options for



learners and this will directly improve the quality of life. The project will be implemented across the country, with the majority of schools being in rural areas. These areas are characterized by high levels of poverty and limited access to essential services. Socio-economic and gender inequalities exist in these areas, due to cultural practices which mostly disadvantage women and children, thereby putting them at risk to incidences of GBV. Whilst construction works will be confined to existing school premises and works undertaken by community members, there is still potential for this risk to arise due to the interaction between community workers and school going children. In order to mitigate this risk, the project will build on existing institutional policy guidelines for addressing GBV in the MoE and provide technical assistance on strengthening the component of GBV management. These efforts will be supplemented by the adoption of World Bank guidelines for addressing GBV as espoused in the Good Practice Note on GBV. Furthermore, consideration for GBV prevention and mitigation will be included in the site specific ESMPs and adoption of appropriate workers code of conduct will be a requirement. The project will support implementation of the safe school program aimed at promoting girls' participation in education and contributing to prevention of GBV. Targeted schools will benefit from training related to safe schools and on how to respond to GBV, through inclusive outreach activities to students, teachers, parents, and communities. In addition, the project will engage a GBV service provider to develop and operate a GRM with a confidential GBV incident reporting mechanism and referral procedures.

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

For environmental safeguards, the project has been taking measures to address the previous third-party report concerns regarding inadequate waste management practices on construction sites, including implementing segregation and reuse wherever it can. The current ZEEP Project Implementation Unit has developed terms of reference for an environmental audit of environmental impacts of civil works. In terms of social safeguards, the project has updated the pending GRM Framework. The team will, however, be required to improve its reporting system and finalize the contracting of the child help line supporting the GRM. The project is also required to roll out the GRM to the community and all stakeholders.

In addition, in order to minimize adverse environmental and social impacts, site selection for all construction activities in beneficiary schools will be restricted to the gazetted school boundaries. This will eliminate issues related to resettlement and conflicts with local communities and further eliminate or minimize environmental impacts associated with project activities. The proposed construction of boarding facilities is not likely to result in impacts on encroachers, as construction will be undertaken within existing school premises. The MoE acquired land for school construction through voluntary land donations made by local chiefs in respective provinces. Under the parent project, the new school infrastructure, which includes boarding facilities, is being built within the existing school land. In cases where additional land was required to accommodate new school infrastructure, traditional chiefs and their subjects were consulted prior to land donation.

For the second AF, construction of classrooms and associated facilities under is expected to be done within existing school premises for which land has already been allocated for the purposes; . If the need arises, requirements for voluntary land donations will be aligned to current practices under the parent project and be in accordance with customary practices of chiefs voluntarily contributing land for the construction of public infrastructure such as schools. This process would be done with the prior knowledge and informed consent from land users that land has been obtained without coercion or duress. In customary practice the chief works with the chiefdom development trust (who oversee and facilitate various development projects across the chiefdoms). These chiefdoms are divided into zones headed by senior village headmen who head various villages, each village is led by a headperson. During land identification or verification, the headperson and his/her committee have records in a village register comprising of land parcels, its boundaries, and details of ownership such as the name of villager or institution. Once it is established that no one owns the land, the institution or person requesting the land is issued with a parcel certificate which is



signed off by the chief and headperson. The process also assists in ensuring that land acquired it is free from any encumbrances. In other incidences through consultation, the village neighbors also confirm that the land is free from any encumbrances. Although not expected, if necessary, the project will make use of the same approach, in this regard, voluntary land contribution for ZEEP schools will be made with the prior knowledge that land is obtained without coercion or duress and that voluntary contribution is an act of informed consent.

The process of voluntary land donation due diligences will be documented. This will be achieved through verification and documentation that land required for the project is given voluntarily and that the land to be donated is free from any dispute on ownership or any other impediments and that meaningful consultations have been conducted. The Ministry will verify that land required for the project is given voluntarily and is free of any dispute on ownership or any other impediments, and that meaningful consultation have been conducted. Any impacts on livelihood activities will be assessed and where necessary alternative land of equal value identified following consultations with the local chiefs and surrounding community. MoE would then assists with the processing of formal land titles and that will be extended to all the schools supported under the second AF.

The Ministry has been encouraged to obtain documentation from the chiefs to facilitate the processing of land titles to formalize land donations and thus secure public infrastructure. This process in an ongoing activity as MoE is currently conducting site selection; however, this process is being monitored by the Bank and as necessary the practice outlined and processing of land titles currently underway under the parent project would be extended to all the schools supported under the second AF.

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

The implementation of environmental and social safeguards activities under the second AF will use the World Bank's Environmental Safeguards Policies. The implementing agency is the MoE, which has gained experience in implementing a World Bank financed project through the parent and first AF of ZEEP. Given the expanded geographical and technical scope, the current PIU will be expanded, and renamed as ZEPCU. The project has been experiencing challenges in Environmental and Social Safegurd areas, including bringing on board adequate staffing necessary for implementation of environmental and social safeguards. Significant delays have been observed in the hiring of dedicated staff under ZEPCU to deal with Environmental, Social and GBV/SEA issues, which have affected project implementation. Nonetheless, the project is making progress through advertising the positions.

ZEPCU will hire a dedicated Environmental Safeguard Specialist and Social Safeguards Specialist to fulfill all environmental and social risk management aspects. The Environmental and Social Safeguards Specialists will be responsible for monitoring and coordinating the implementation of all Environmental activities of the project; training of relevant provincial, district and school level staff on the ESMF; reviewing and finalizing environmental and social Screening Forms; and preparation and implementation of and compliance with site specific ESMPs.

The Social Safeguard Specialist at ZEPCU will be responsible for coordinating, monitoring, and reporting the implementation of all GRM and stakeholder engagement/consultations activities. This will be carried out in collaboration with the Provincial Education Office, District Education Boards Office, the Gender Committees and community representatives. With regards to the GRM, the Social Safeguards Specialist will ensure that GRM committees are established at community, district and provincial levels. To mitigate GBV risks, the in-house experts will also ensure that the school level project implementation committee and community workers adopt mitigation measures in their code of conduct as well as include a zero-tolerance policy towards sexual exploitation and abuse by holding periodic training for workers and communities on SRGBV prevention, mitigation, and response. The project

will ensure that there are trainings in Safeguards compliance, which will include training for communities on GBV, GRM, Occupational health and safety, and Community Engagement. These trainings will be sequenced in line with the construction program of works. The training plan will be a part of the Project Implementation Manual.

An ESMF was prepared, consulted and disclosed prior to appraisal of the parent project. The ESMF was updated for the first AF of ZEEP and the second AF ESMF is being updated to include potential environmental and social risks likely to result from the expanded scope of the second AF. A corresponding ESMP template to manage generic construction impacts related to the construction of new classrooms and associated facilities was also prepared. The second AF will lead to expansion of activities under Component 2. The updated ESMF will be disclosed by the Client and on the Bank website.

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

During project preparation, several site visits were conducted as part of the design process of the project to the interventions areas in beneficiary areas as well as in the surrounding districts. Additionally, several stakeholder workshops took place during the project preparation process. Consultations involved site visits, meetings with Ministry of Education, school heads and their staff, learners and communities.

Consultations were held to ensure proposed land was free of individual or community use, and in instances where livelihood activities were impacted, alternative land of equal value was sourced in consultation with the local chiefs and the community. Furthermore, the process of consultation was aimed at confirming the absence of conflicts related to ownership of the proposed land donated for schools. The MoE working with local chiefs and community representatives screened all sites to exclude any areas with encumbrances in the respective provinces.

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
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"In country" Disclosure

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

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APPROVAL

Task Team Leader(s):	Girma Woldetsadik Veronica Grigera
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Approved By

Safeguards Advisor:		
Practice Manager/Manager:		
Country Director:		

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