Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 11/30/2018 | Report No: ESRSC00096
B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?
No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]
The GALOP focuses on improving learning in basic education by strengthening teacher capacity, school support and resourcing, and accountability systems for improved decision-making. While system interventions (particularly for accountability) will be national in scope to ensure full harmonization of the system, learning interventions will target schools with the greatest challenges in terms of learning outcomes and resources. Using a results based financing approach, the two results areas- Learning and Accountability- are mutually reinforcing as Ghana aims to improve learning outcomes. The proposed design aims to build capacity in key institutions and support the integration of digital monitoring and data collection at all levels.

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

The project activities will target underperforming (low-resourced) schools across the country. About a third of schools will be selected to benefit under the project based on the resources available. The criteria for selection will be informed by the planned performance ranking of all schools. Given the current scope of the ongoing USAID Partnership for Learning (covering in all basic schools in 100 out of 216 districts), the GALOP will aim to cover schools outside this program for components 1 and 2. The selected schools to benefit under the project will be correlated against the poverty indices of the districts in which they are located to check the equity relevance of the selected schools. However, at this stage of preparation, the specific project locations have not yet been identified. All sub-projects will be guided by the requirement of the ESF and Environmental and Social Standards of the World Bank. This approach will allow for the screening of selected schools further down during implementation where details of the Sub-Project Environmental and Social screening will provide some details on potential risks with the required mitigation measures.

D.2. Borrower’s Institutional Capacity

The Ministry of Education (MOE) and the Ghana Education Service (GES), are the main institutions responsible for leading implementation of this project. The MOE will manage the administration of Component 4, while GES will be primarily responsible for the RBF component of the program (Components 1-3). Although both MOE and GES have implemented a results-based financing project under the Ghana Secondary School Improvement Project (SEIP) and have recruited two (2) safeguards officers (consultants) to support and coordinate safeguards activities at various levels before, however, the legal and institutional structures of these two institutions do not generally have the capacity to implement the Environmental Social Framework (ESF). Therefore, a detailed capacity assessment of these implementing units will be undertaken prior to appraisal. Further, given the expanded scope of the ESF and the clients’ unfamiliarity with it, a capacity building support/detailed capacity building measures for the implementation of the Environmental and Social Standards will be outlined and captured in an Institutional Capacity enhancement plan as part of the Environmental and Social Commitment Plan.

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

A. Environmental and Social Risk Classification (ESRC)  Moderate

Environmental Risk Rating  Moderate

The Environmental Risk Rating is classified as moderate. The classification has considered the potential environmental risk at this stage. Learning grants awarded to schools could potentially include some minor construction, renovation and refurbishment works. Key environmental issues will be moderate and relate to noise, dust and general health and safety of workers, students, teaching staff. These risks will be site specific, limited to existing school compounds and can easily be managed through the implementation of cost-effective mitigation measures.

Social Risk Rating  Moderate

The social risk rating is also classified as Moderate. Project interventions are expected to be limited to existing school compounds. However, activities such construction of walkways, fence wall etc. will require some degree of due diligence to mitigate against potential issues of boundary dispute or impact on livelihoods. ESS 5 on Land Acquisition, Restrict on Land use and involuntary resettlement will apply to provide guidance on appropriate mitigation measures. The project activities present low risk of GBV but presents an opportunity to supporting initiatives that seek to address GBV in schools as well as ensure disability inclusive activities.
B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

*Overview of the relevance of the Standard for the Project:*

The Bank’s review considered the anticipated environmental and social risk presented by the project, the E&S management requirements and the Project’s capacity to manage its environmental, social, safety and health risk in compliance with ESS1. From the preliminary review at this concept stage, the E&S risk could stem under the learning grants if some proposals request for renovation works. These activities however are expected to be to minor renovations including repairs of school building, refurbishment of ICT and science laboratories, construction of walkways, fence wall/main gate etc. No major constructions are envisaged. Key environmental and social issues will be related to noise, dust and general health and safety of workers, students and teaching staff. Some degree of due diligence is also required to mitigate against potential issues of land boundary dispute or impact on livelihoods. These impacts are not envisaged to be significant or irreversible. They are expected to be site specific, limited to existing school compounds, and can be managed through the implementation of cost-effective mitigation measures.

Environmental and Social Assessment: Since the specific schools that will receive grants and the specific activities each of the grant proposal will likely fund is undetermined, an ESMF and RPF will be prepared, consulted upon and disclosed by the client. This approach will allow for the screening of selected schools further down during implementation using the checklist to be developed and the development of associated ESHIA, ESMPs and (A)RAPs as may be required. The Project will address the needed measures through the preparation and implementation of an Environmental and Social Commitment Plan (ESCP) to be prepared by the client and reviewed by the WB before project appraisal.

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

Project will not rely on Borrower's E&S

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is key to the success and sustainability of the project development objectives. In consultation with the Bank team, MOE and GES will prepare and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts identified. A draft of the SEP will be prepared and disclosed as early as possible and prior to Appraisal. If major changes are made to the SEP during project preparation or implementation, a revised SEP should be publicly disclosed. The client will engage in meaningful consultations with all stakeholders throughout the project life cycle paying special attention to the inclusion of vulnerable and disadvantaged groups (persons with disabilities, gender groups, and vulnerable children). The client will seek stakeholder feedback through Citizens Engagement surveys and potentially scope for CSOs to validate project results. Ensuring wide stakeholder involvement in program design and implementation especially at decentralized levels would be further supported by an integrated communications strategy. A strong communications plan would be included as a result area to ensure effective dissemination of information, especially related to accountability interventions. The project design will incorporate a comprehensive project-wide GRM which will enable a broad range of stakeholders to channel concerns, questions, and complaints to the various implementation agencies. The project will harness the existing system established under the on-going Ghana Secondary Education Improvement Project. As part of the preparation of the ESMF, the borrower will maintain and disclose a documented
record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions
The project footprint is envisaged to be relatively small. It will potentially include some minor renovation works under the education grant component. The scope of works is small in nature and short term. No workers camp will be established. Both skilled and unskilled labors is not expected to exceed ten (10) workers. These workers will be sourced from local and surrounding communities. The potential for labor issues is minor. However, the project’s Environmental and Social Management Plan (ESMP) will include mitigation measures to ensure the health and safety of workers. The Occupational Health and Safety measures will take into account the general Environmental Health and Safety Guidelines (EHSG).

ESS3 Resource Efficiency and Pollution Prevention and Management
The overall level of environmental risks associated with the project is moderate. However, the following specific aspects in relation to ESS3 will be considered. Dust and Noise: During renovations, dust and noise emissions might likely generate from carpentry works and chiseling of walls. The relatively short-term and small-scale nature of the works suggest that noise and dust levels will not be excessive or cause long-term nuisances. The construction works will however be scheduled to take place during school vacations or off school hours to limit the impact on the children and other persons in the schools. Waste management: Construction activities will generate solid waste which will primarily include concrete debris from Chiseling, metal, wood and glass pieces etc. The waste generated by the construction works will be segregated according to type, stored in appropriately labeled containers and largely disposed of at approved sites according to the provisions in the ESMF.

ESS4 Community Health and Safety
The project’s civil works will mainly be undertaken within school compounds. The potential impacts on school children and staff will be assessed and addressed in the project ESMPs. The need for an Emergency Preparedness and Response Plan will be further assessed during project preparation.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
The project will support learning grants and performance improvement awards. Since utilization of grants is flexible at the school level, they could potentially fund some renovations including the construction of walkways, fence walls, repairs of school building etc. These activities are expected to be limited to existing school compounds. However, some due diligence is required to mitigate against potential issues of boundary dispute or impact on livelihoods. ESS 5 is applied to provide appropriate mitigation measures. Since project related activities which might lead to livelihood impacts or restriction in access are unknown, the project will prepare and disclose a resettlement policy framework (RPF) prior to appraisal to guide the preparation of Resettlement Actions Plans during implementation if required.
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
Relevance of this ESS will be further assessed during Project preparation as part of the ESMF process.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
This ESS is not relevant in the project area. There are no Indigenous Peoples/Sub-Saharan Historically Underserved Traditional Local Communities in Ghana or in the project area of influence as defined by the African Commission on Human and Peoples’ Rights and the United Nations.

ESS8 Cultural Heritage
Relevance of this ESS will be further assessed during Project preparation. “Chance Find” procedures will be outlined in the project ESMF.

ESS9 Financial Intermediaries
Relevance of this ESS will be further assessed during Project preparation as part of the ESMF process.

C. Legal Operational Policies that Apply

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<tr>
<th>OP 7.50 Projects on International Waterways</th>
<th>No</th>
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<td>OP 7.60 Projects in Disputed Areas</td>
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III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

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

Actions to be completed prior to Bank Board Approval:
- Preparation, consultation and disclosure of ESMF and RPF
- Preparation of Stakeholder Engagement Plan
- Borrower’s/Implementer’s institutional capacity
- assessment on safeguards
- Gender and GBV assessment
Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

Actions to be completed prior to Bank Board Approval:
- Preparation, consultation and disclosure of ESMF and RPF
- Preparation of Stakeholder Engagement Plan
- Borrower’s/Implementer’s institutional capacity assessment on safeguards
- Gender and GBV assessment

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
- Implementation of SEP
- Development and implementation of institutional capacity strengthening plan for ESS
- Screening of sub-projects as the schools who will undertake renovation works are determined
- Preparation of site specific ESHIAs and ESMPs and RAPs as may be required after project screening
- Implementation of the ESMF/ RPF
- Establishment and implementation of Project GRM
- Implement Gender and GBV action plan

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 26-Mar-2019

IV. CONTACT POINTS

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<th>World Bank</th>
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V. FOR MORE INFORMATION CONTACT
VI. APPROVAL

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<tbody>
<tr>
<td>Task Team Leader(s)</td>
<td>Dina N. Abu-Ghaida, Deborah Newitter Mikesell, Eunice Yaa Brimfah Ackwerh</td>
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<tr>
<td>Practice Manager</td>
<td>Halil Dundar (PMGR) Concurred on 05-Mar-2019 at 17:26:13</td>
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