



Additional Financing Appraisal Environmental and
Social Review Summary
Appraisal Stage
(AF ESRS Appraisal Stage)

Date Prepared/Updated: 08/31/2020 | Report No: ESRSAFA034



BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Sierra Leone	AFRICA WEST	Republic of Sierra Leone	Ministry of Basic and Senior Secondary Educaiton
Project ID	Project Name		
P174958	Sierra Leone COVID-19 Education Response AF		
Parent Project ID (if any)	Parent Project Name		
P167897	Sierra Leone Free Education Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	11/27/2020	1/29/2021

Proposed Development Objective

The project development objectives are to improve the management of the education system, teaching practices, and learning conditions.

Financing (in USD Million)	Amount
Current Financing	0.00
Proposed Additional Financing	0.00
Total Proposed Financing	0.00

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

Yes

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

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The Sierra Leone Free Education (FREE) Project (P167897) in the amount of US\$50 million was approved on June 29, 2020, signed by the Government of Sierra Leone on July 13, 2020 and became effective on August 10, 2020. The project development objectives of the parent project are to improve the management of the education system, teaching practices, and learning conditions.

The proposed Sierra Leone COVID-19 Education Response is being prepared as an Additional Financing (AF) to the FREE Project. An exception to the requirement of 12 months of satisfactory project implementation of the parent project is being sought from the Africa Regional Vice President. Also, in response to the pandemic and the need for a rapid response, it is proposed to apply Paragraph 12 of Section III of the IPF Policy to the AF, and to process it using Condensed Procedures, within the context of the global COVID-19 pandemic.

The AF would be financed by a grant in the amount of US\$6.85 million from the Global Partnership for Education (GPE) over an 18-month period. On March 31, 2020 the GPE Board voted to create a US\$250 million COVID-19 Accelerated Funding Window under the GPE Fund (for which the Bank is the Trustee). This window will provide allocations to address the pandemic's impact on education systems in 67 eligible-to-apply countries. The GPE approved Sierra Leone's proposal in the amount of US\$7 million (including Grant Agency supervision fees in the amount of US\$150,000) on June 15, 2020. The World Bank has been selected as the Grant Agent by the Ministry of Basic and Senior Secondary Education (MBSSE) and the Local Education Group (LEG) for the Sierra Leone GPE COVID-19 grant.

The AF is well aligned with the Government's education priorities and strategies including those outlined in the COVID-19 Education Emergency Response Plan. Other development partners, including the European Union, U.K. Department for International Development (DFID), Irish Aid, United Nations Children's Fund (UNICEF) and nongovernmental organizations (NGOs) are expected to contribute to the funding of this Plan. The World Bank will ensure alignment with partners' activities and involvement of key stakeholders as appropriate to leverage resources. Also, the focus of the AF is aligned with the emphasis of the World Bank Group's Country Partnership Framework (CPF) for Republic of Sierra Leone, specifically with its emphasis on the importance of investing in human development.

Under the AF, the PDO will remain unchanged. The FREE Project consists of the following components: (i) System Administration, Governance and Accountability which aims to strengthen the education system in areas of policy, governance, accountability, and administration for enhanced quality of education services; (ii) Teacher Management and Professional Development which seeks to address the critical teacher quality and workforce management issues in the country; (iii) School-Level Education Development which aims to improve the quality of education and the teaching and learning environment by addressing school-level needs; (iv) Project Management, Coordination, and Monitoring and Evaluation which will support the management of the project, as well as coordination and monitoring and evaluation aspects; and (v) Contingent Emergency Response Component (CERC) which aims to allow for rapid reallocation of project proceeds in the event of a natural or artificial disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact.

Under the proposed AF, a sixth component—COVID-19 Education Response—will be added. Component 6 will comprise the following sub-components: (6a) Strategic Communications; (6b) Continuous Distance Education Service Delivery; (6c) Safe School Reopening, and Health and Safety of Students including the Most Vulnerable; and (6d) Effective Operations, Planning and Policy during and after the COVID-19 Crisis.



The design of Component 6 is responsive to strategies articulated in the MBSSE’s Education Sector COVID-19 Response Plan. The proposed project will ensure strategic communications and strengthen continuous distance education service delivery. It will also support safe school reopening, and health and safety of students including the most vulnerable. Lastly, the proposed project will support sustaining effective Government’s operations, planning and policy during and after the COVID-19 Crisis.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

Similar to the parent project, the AF interventions will be implemented nationwide in both rural and urban areas. The environmental and social (E&S) contexts will therefore differ among the specific project locations and sub-projects. The AF will finance the supply and rehabilitation of school WASH facilities. At this stage, the specific project locations for rehabilitation have not yet been identified. It is however expected that, these rehabilitation will be undertaken on existing school locations and the likelihood of land acquisition is minimal. The project implementation will be guided by the requirement of the Environmental and Social Standards (ESSs) of the World Bank. Given that the specific impact locations of the project are not yet known, the Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) that have been prepared for the parent project, will be updated for the AF. The ESMF and the RPF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. These instruments will guide the implementing agencies to identify, assess and mitigate the environmental and social risks and impacts associated with each sub project. The two instruments have also outlined the institutional measures to be taken during the preparation and implementation of the relevant ESSs, including capacity building activities.

It is expected that, the rehabilitation works for the AF will be undertaken during the period when schools are still closed due to COVID-19 in preparation for safe re-opening. This will minimize the risk of SEA/SH due to minimal interaction between project workers, school children and staff. Notwithstanding, search for jobs and procurement opportunities by the local residents could provide grounds for sexual harassment and exploitation of girls and women. The high contextual Gender Based Violence (GBV) risk in Sierra Leone (more than half of women and men age 15-49 having experienced physical violence at some point since age 15) and weak legislation to address sexual harassment and Domestic Violence, points to the need to maintain the SEA/SH mitigation measures for the parent for the AF as well. The COVID-19 crisis may accentuate the existing risks and bring additional risks of gender inequalities, GBV, and adolescent pregnancy as women and young girls may face greater expectations of care-giving for children and relatives at home instead of studying and teaching, and are more prone to domestic abuse without regular access to school, teachers, and other support systems in the community. Based on the gender analysis, the parent project developed a strong gender results chain to identify, address, and monitor key gender issues in the education sector. The project activities involving both school-, community- and system-level interventions supported under each of the project’s components to bring girls back to school after reopening and enable pregnant girls and dropped-out young mothers re-enter formal education. Under AF, special attention is being given to the most vulnerable including girls, pregnant girls, out-of-school children, and children at risk of dropping out. The AF will carry out community outreach campaigns to support girls, vulnerable children and other students at risk of dropout. Further, for wellbeing and

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protection, the AF will support the provision of psycho-social support to children and teachers and gender-focused activities.

Children with disabilities often have limited access to schooling and have lower completion and retention rates than children without disabilities. In the 2018 ACS, nearly 30,000 students in the four levels of education in Sierra Leone are children with disabilities. This represents 1.5 percent of total school enrollment. Keeping in mind Sierra Leone’s post conflict and fragile context, many more children, women, and people of all ages will experience significant range of disabilities than would be found in a comparable area that has not undergone these impacts. From the social review of the AF, persons with disabilities are likely to suffer from being sidelined from risk communications, health and safety measures, and distance learning. The technical design of the AF will leverage the interventions to facilitate catching up and accelerated learning, support reopening schools, support a safe return to schools for vulnerable populations, provide psycho-social support to students, and provide technical assistance for modification of teaching. Furthermore, it is very likely that existing schools’ WASH facilities may not be suitable or equipped to serve students, teachers and other users with disabilities and could exclude vulnerable groups from having equal access to these facilities. In order to mitigate the likelihood of exclusion risks associated with the financing of the supply and rehabilitation of schools’ WASH facilities, the project, to the extent possible, will be required to incorporate’ universal design requirements to schools’ WASH facilities design and rehabilitation works.

D. 2. Borrower’s Institutional Capacity

The AF is being prepared by the Ministry of Basic and Senior Secondary Education (MBSSE); the main institution responsible for leading implementation of the parent project. Although MBSSE will lead the implementation, several public organizations and entities including ministries, local councils, school management committees, EPA, NGOs etc will be involved in the implementation of the environmental and social aspects of the project. These entities will play leading roles in permit approval, construction, grievance redress, day to day monitoring, supervision and reporting, information disclosure, consultancies, supplies etc. The task team conducted a more structured institutional capacity assessment to support E&S capacity enhancement of the Government team for the parent project and identified a number of challenges that need to be addressed to meet the requirement of national laws and the applicable ESSs. These challenges are a reflection of gaps on conflict in existing laws, inadequate human and material resources or weakness in the collaborative networks among actors. MBSSE has no existing environmental and social management system and procedures in place. There is no role for safeguards officers in the current structure of MBSSE to provide ES oversight and coordination. The local councils have Environmental and Social officers(ESOs) , but just like the various national and district level actors, they have no experience implementing the ESF. Additionally, the ESOs and engineers at the local councils that will support the supervision of works at the local level are not mobile enough to effectively supervise/monitor for compliance with the requirement of the applicable ESSs. In addition, high staff turnover was reported among the Councils surveyed as part of the capacity assessment. There is the need to put in place standard E&S checklist for use by the Environment and Social Officers in the field for monitoring and supervision at the various project sites. Based on recommendations from this assessment, MBSSE will recruit an environmental and social specialist to be based at the Free Education Secretariat. It will also establish an Environmental and Social Management and Reporting System and a Grievance Mechanism which will cover for the AF as well. The project will also use a specialized GBV NGO/ service provider to support the implementation and supervision of SEA/SH mitigation measures. Training for the safeguards officers on the new ESF is recommended and included in the ESCP. The assessment included the development of a template for reporting accidents, labour management plans, code of conduct and environmental and social management plans that will to support the establishment of the ESMS. Estimated budget for E&S implementation, training and capacity building activities, monitoring and supervision is reflected in the project PAD of the parent project. The SL EPA as the regulatory agency has experience in the



application of the existing World Bank Safeguards Operational Policies and a good number of experienced Environmental Officers. However, the agency does not have any experience in the application of the new ESF and just like the MBSSE, will need support to build their capacity in the expanded scope and application of the ESF. The parent project became effective on August 10, 2020 and yet to commence implementation of these recommendations. The AF however has minimal infrastructure and influx is not expected. With gradual easing and adherence to the COVID-19 protocols for congregation or group meetings, ES implementation should not pose substantial or higher risk above the capacity measures proposed for the project. The AF will also employ the use of an NGO Consortium to help the Government deliver activities rapidly, focusing more on community engagement to reach the most marginalized and deprived groups.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The potential environmental risk is classified as moderate, as it relates to the refurbishment of school WASH facilities and Fumigation of school for safe reopening. In addition to the refurbishment of school WASH facilities, the WASH sub-component includes the provision of boreholes and sanitary facilities for a select number of schools throughout the country. The risk classification therefore covers the rehabilitation and operational phases of the facilities to be provided or rehabilitated.

The WASH refurbishment will be limited to existing school compounds, hence the environmental footprint during rehabilitation is expected to be minimal. The key environmental issues that can be anticipated at this stage are related to: (i) nuisance related to air and noise emissions; (ii) health and safety of students, teaching staff and visitors; (iii) disposal and management of rehabilitation waste; (iv) traffic management; (v) occupational health and safety; (vi) community health and safety, and; (vii) erosion of debris (especially if works are carried out in the Rainy Season) and potential contamination of surface waters.

At the operational stage, there are sustainability risks typical of WASH programs; namely, the challenge of maintaining access over time, due to maintenance and mechanical problems; issues of inefficiency and wastage; safety at the source, and outlet, and; in the case of sewage, pollution of groundwater. Once the sites have been identified, ESMPs and checklists will be prepared to address site specific risks.

These impacts would be site specific, limited to the immediate surroundings and can be managed through the implementation of cost-effective mitigation measures indicated in the ESMF and ESCP. Notwithstanding, old waterworks systems in Sierra Leone do contain asbestos pipes, as is evident in Freetown. Whilst the situation in the secondary cities and towns is unknown, the contractor may run the risks of contacting asbestos cement (AC) pipes during project implementation. Hence an asbestos assessment or review has to be conducted ahead of the refurbishment activities. Fumigation of schools may involve use of chemicals that must be used and handled safely.

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Social Risk Rating

Moderate

Similar to the parent project, the social risk for this AF is rated as Moderate. The AF in general, presents a positive social impacts as it will put in place substantial distance learning to safeguards against school dropout, adolescent pregnancy during school closures and build the digital infrastructure in the education sector. In spite of this, disadvantaged students including girls, those with disabilities, children in rural remote areas, and those who lack access to technology are likely to fall further behind without consideration for inclusive and accessible outreach campaign, safe and accessible delivery of learning packages and assistance to teachers and parents to support children with special learning needs. School refurbishment will be limited to existing facilities and will likely present moderate risks that relate to noise, dust and general health and safety of workers. Also, it is very likely that, existing schools' WASH facilities may not be suitable or equipped to serve students, teachers and other users with disabilities and could exclude vulnerable groups from having equal access to these facilities. No land acquisition or any form of displacement is anticipated under the AF interventions. The risk of GBV (SEA/SH) was rated as moderate for the parent project and will remain unchanged for the AF. Refurbishment works under the AF is not expected to generate large influx and likely to be undertaken when schools are still closed due to COVID-19. This will limit the risk of SEA/SH between workers, school children and staff. The context of COVID-19 crisis however presents additional risks of SEA/SH and teenage pregnancy as girls and women are more prone to domestic abuse under stay-at-home orders without regular access to schoolteachers and other support systems in the community. Further, children and persons with disabilities are also at risk of sexual assaults. These risks transcend mitigation through the ESF. The technical design of the AF therefore includes interventions to train teachers to support psycho-social and child well-being in response to the COVID-19 pandemic. It will also collaborate with development partners and an NGO consortium to develop materials and carry out community outreach campaigns to support girls and children with disabilities. This will be complemented by intervention under sub-component 1.3 of the parent project which seeks to address system and school level gender and disability disparities in access to learning as well as school based Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).

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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 Project will make use of this standard to assess and manage environmental and social risks and impacts. The project environmental and social risk rating considered the potential risks and impacts associated with the rehabilitation of school WASH facilities, sanitization of schools especially those used as isolation or quarantine centers, public awareness and communication and development of guidance, protocols and standard operating procedures, for safe school reopening as well as the capacity of the client to implement the requirement of the World Bank Environmental and Social Standards. The nature of the anticipated risks and impacts under the AF component are not adverse given that the refurbishment work are not complex and will be limited to existing school compounds. It is not envisaged that land acquisition, involuntary resettlement or any natural or sensitive habitats will be affected by the works. However, asbestos assessment has to be conducted ahead of the refurbishment activities as indicated in the parent project ESMF. Sanitization and fumigation of schools may involve the use of chemicals that must mitigated with a choice of the proper chemicals and application procedures. Specific to schools used as quarantine centers, proper medical waste disposal is a key risk to mitigate.



Refurbishment works under the AF is not expected to generate large influx and a worker’s camp is not anticipated. Works are likely to be undertaken in periods when schools are not in session. This will limit the risk of SEA/SH between workers, school children and staff. In spite of these, the AF will still follow the SEA/SH measures related to civil works outlined for the parent project. The likely labor risk may include health and safety of workers including risk of COVID-19 spread among workers and the local communities, poor labor working conditions, grievances over local recruitment process and selection, and protection of female workers. The AF activities will not raise the Environmental and Social Risk Categorization (ESRC) or introduce any new Environmental and Social Standards (ESSs) other than those that are already covered in the parent project. As such, the preparation and implementation of the activities under this AF will comply with all ESF requirement of the parent project. An Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP) have all been prepared and disclosed for the Parent project. This AF will however necessitate the update and re-disclosure of the SEP, ESFP prior to project Decision and the ESMF and RPF within 30 days after effectiveness to ensure that mitigation measures for disinfection of schools, inclusive COVID-19 risk communication and distance learning measures are covered consistent with the ESF. The ESFP has outlined the client’s commitments to screen all sub-projects further during implementation and prepare associated Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plans (ESMPs), ARAP as may be required.

The social review also identifies the risk of exclusion in the distance learning platforms for students with disabilities, children in rural remote areas, and for those who lack access to technology if there are no consideration for inclusive and accessible outreach campaign, safe and accessible delivery of learning packages and assistance to teachers and parents to support children with special learning needs. A social assessment conducted for the parent project also identified also lack of adapted materials, lack of assistive devices, limited teacher knowledge on how to promote an inclusive education environment, and stigma as barriers that restricts Girls and persons with disabilities from accessing education. Plans for enhancing gender and disability inclusion are well mainstreamed in the AF distance learning sub-component. MBSSE started the nation-wide distance education service delivery through radio transmission one week after the school closure due to COVID-19. The proposed AF will strengthen the continuous distance education service delivery by updating its contents, diversifying mode of delivery, and improving the quality of service delivery. This will complement interventions under sub-component 1.3 of the parent project dedicated to financing both school- and system-level interventions to promote gender equality and disability inclusion in education. This will among others include the establishment/strengthening of mechanisms for reporting School based GBV at the community level and develop a platform for effective response, including financing to strengthen key support and health services and establishment of a strong referral mechanism. All school infrastructure will be disability accessible and in-service teacher training will include modules on GBV and disability issues

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ESS10 Stakeholder Engagement and Information Disclosure

The project’s stakeholder’s engagement plan aims at creating a “social licence” and will depend on mutual trust, respect and transparent communication between the project and its stakeholders. It is geared toward improving decision-making. It is key to the success and sustainability of the project development objectives. In consultation with the Bank team, the MBSSE has prepared a Stakeholder Engagement Plan (SEP). The SEP outlines the key stakeholders



and the approaches that will be used to consult with them including consideration for needs of vulnerable and disadvantaged groups (teachers, pupil/ students with disabilities etc) to ensure their participation. During preparation, the project held several consultations with MBSSE, teachers, parents, School Management Committees, Local councils, NGOs including disability and Gender groups to inform an inclusive project design (Please see SEP for details). The SEP also present a comprehensive list of the direct stakeholder and stakeholders with other interests and the different engagement mechanisms that will be used to ensure effective consultations. The SEP includes comprehensive M&E arrangement to monitor the SEP implementation and mechanism for Grievance and complaints redress. For this AF, the SEP is being updated to ensure engagement mechanisms respond to COVID-19 restrictions on meetings, gatherings, movement of people and reduced personal contact and consistent with the World Bank interim guidance on stakeholder engagement in times of pandemic. The AF will develop a communication strategy to inform the project’s COVID-19 risk communication for communities and schools. This strategy should build synergies with the project SEP for proper stakeholder mapping to ensure that, the communications outreach campaigns are inclusive and accessible to children, children with disabilities, children in remote areas and other vulnerable population. The SEP is a living document and will be reviewed during implementation. Major revisions to the SEP during implementation will be publicly disclosed.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

The project footprint is envisaged to be relatively small and may not likely entail a large scale of skilled and unskilled labor influx. The contracting structure of the project will follow WB’s ESS2 and Sierra Leone’s Local Content Policy by giving preference to local labor and services from within the communities. The likely labor risk may include health and safety of workers during the construction and operational phases, general labor working conditions, community grievances over recruitment process and selection, and protection of female workers, and local communities from SEA/SH risks. The risk of COVID-19 spread may also result from inadequate adherence to occupational health and standards. The ESS2 requires MBSSE to promote sound workers and management relationships and enhance the development benefits of the project by treating workers fairly and by providing safe and healthy working conditions. The project has included labor management procedure as part of the ESMF for the parent project which will be applicable to this AF. The contractor will be required to update the Labor Management Procedure into a Plan during implementation and comply with its requirement. The contractor will also be required to establish a worker’s GRM to address employee complaints and grievances.

Occupational Health and Safety (OHS): To ensure health and safety of workers during the rehabilitation work and operational phases of the project, MBSSE will develop and implement a Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) and WHO Guidelines. The plan will include procedures for workers grievance reporting, and investigation of incidences and non-conformance, emergency preparedness and response procedures and continuous training and awareness to workers, ensure adequate supplies of PPE (particularly face-mask, gowns, gloves, handwashing soap and sanitizer) are available . The task team will ensure that MBSSE is also familiar with the safeguards incidence response toolkit (SIRT) as a guide to report and manage incidents should they occur.

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ESS3 Resource Efficiency and Pollution Prevention and Management

Whilst the nature and extent of rehabilitation of the WASH facilities are unknown, there may be need for materials such as metal and plastic pipes (PVC and HDPE), aggregates, stones, sand, cement blocks and timber. It is important that these are sourced locally to reduce transport related risks, and to contribute to the local economy. For materials obtained from large scale suppliers, the project shall ensure that all national regulations and assessments and permitting requirements are adhered to by the supplier as required by EPA, and this should be clearly described in the ESMP. Air emissions will include exhaust from vehicles and machinery, and fugitive dust generated by the works. Those most likely to be affected are school children, teachers, the elderly, people with medical conditions and those living close to the works sites. Mitigation measures such as dust suppression, vehicle maintenance etc., will be applied to minimize the impacts, and residual impacts are expected to be limited in scope, intensity and duration. Noise will likely be generated from use of vehicles, generators, drills and other equipment. The relatively short-term and small-scale nature of the works suggest that noise levels will not be excessive. Major works will be scheduled to take place during school vacations to limit the impact on children and persons in the schools.

Liquid and solid waste will mainly include sewage, spills, contaminated soil, oils from equipment and vehicles, concrete blocks, metal and glass pieces from broken pipes and structures etc. General wastes will be segregated, stored and disposed at approved sites. All leftover wastes from the use of the school facilities as quarantine and isolation centers will be treated as COVID-19 related wastes and will be handled in accordance with the ESMF, WHO guidelines on the prevention and transmission of COVID-19 and the GoSL's directives and regulations on the infection. The unit responsible for handling COVID-related medical wastes at the MoHS and EOC will be brought in to handle the waste.

There is also the issue of shutdown of water supply or wastage of water during pipe cutting and fixing, or the issue of inaccessible toilet facilities, which would deprive users. The project will be designed and executed in such a manner as to minimize inconveniences, by providing temporary water and sanitation alternatives during works.

Post-rehabilitation risks that should also be addressed in the ESMF are the contamination of surface or groundwater and soils by sewage from septic tanks; and wastage from recurrent breakage of pipes as a result of wrong choice of materials or pipe exposure on roads and pedestrian path.

ESS4 Community Health and Safety

In line with safety provisions in ESS2, it is equally important to ensure the safety of communities during project implementation. The greatest risks to community health and safety is from the disinfection and medical waste disposal from schools used as quarantine facilities, COVID-19 spread during rehabilitation. Movement of vehicles can lead to accidents. Construction in schools can also lead to dust emission, noise, increased generation of solid waste, etc. Potential threats to people and communities may be posed by uncovered or barricaded or not signage spots such as excavated sites, trenches, open electric cables, etc. the community people must be protected from potential sexual exploitation and abuse by contractors. School infrastructure must also ensure unimpeded access to all including persons with disabilities. As part of ESMPs, the Project will evaluate site specific Community Health risks and impacts of the Affected Communities during the project life-cycle and will establish preventive and control measures. The project will document site specific emergency preparedness and response activities, resources, and



responsibilities as part of the ESMPs and will disclose appropriate information to Affected Communities, relevant government agencies, or other relevant parties. measures will be taken for SEA/SH prevention and response such as including in Civil works contracts, Codes of Conduct to prevent GBV (SEA/SH).The ESCP documents commitment to ensure the contractors prepares a well costed SEA/SH action plans. a local NGO will be identified and partnered to assist in GBV response including supporting the design of SEA/SH sensitive GRM, training and awareness raising on GBV for the local communities and MBSSE, ensure that care seeking behaviors and knowledge of how and where to report SEA/SH cases are known and support survivors to receive appropriate support services (medical/physical-social counseling and legal aid as agreed with the survivor).

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Rehabilitation of Water, Sanitation and Hygiene facilities under the AF are expected to be undertaken within existing schools and does not envisage land acquisition, physical or economic displacement and restriction of access. This standard is however maintained due to interventions under the parent project and the need to update the existing RPF to reflect the additional description of the AF component.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The rehabilitation works will take place within existing school compounds thereby minimizing impacts. Hence, the environmental risk with regard to ESS6 is expected to be minimal. Work shall not be carried out in sensitive ecosystems/habitats/species, such as protected areas, forests, wetlands and IUCN listed species to avoid elaborate offsets and project delays. However, there is a risk of contamination of watercourses and wetlands from overfilled septic or sewage holding tanks post rehabilitation. The ESMF will not only provide guidance on screening and instituting mitigation measures to ensure that project activities do not impact negatively on any critical or sensitive natural habitats, especially wetlands or biodiversity and living natural resources; but will also address risks associated with the running and use of the facilities. The project design will incorporate sustainability parameters. The project will follow a hierarchy of mitigation with preference for avoidance of sensitive receptors. In the unlikely event that significant risks and adverse impacts to biodiversity and habitats are observed to be associated with a specific target, an alternative structure shall be selected. With regard to primary suppliers, the project will establish system and verification practices (certification, licensing, permitting, etc.) to ensure that project goods or materials are sourced from sustainably managed areas.

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

This ESS is not relevant in the project area. There are no known Indigenous Peoples in the project area.

ESS8 Cultural Heritage

Project activities will take place within existing school compounds and does not envisage any impacts on physical, cultural, and/or archeological sites. However, the project will take cognizance of tangible and intangible cultural heritage sites and items, including potential archaeological heritage within the project's area of influence. The Project will adopt measures such as undertaking meaningful consultations with stakeholders regarding cultural heritage and



implementing basic mitigation measures. In the event of finding features of cultural value during project implementation, 'Chance Find' standard procedures developed under the ESMF would be followed.

ESS9 Financial Intermediaries

This standard is not relevant at at this moment as the project will not rely on FI for execution of any part of the project activities.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

none

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of Sierra Leone

Implementing Agency(ies)

Implementing Agency: Ministry of Basic and Senior Secondary Educaiton

V. FOR MORE INFORMATION CONTACT

Public Disclosure



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VI. APPROVAL

Task Team Leader(s):	Mari Shojo
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