

ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT (ESSA)

FOR

**ADDITIONAL FINANCING TO GENERAL EDUCATION QUALITY IMPROVEMENT PROGRAM FOR EQUITY
FOR REFUGEES INTEGRATION**

(GEQIP-E AF)

May, 2019

Addis Ababa, Ethiopia

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Acronyms

AF	Additional Finance
AGP	Agriculture Growth Project
AHA	African Humanitarian Action
ARRA	Administration for Refugee Returnees Agency
ASA	Advisory Service and Analytics
AU	Africa Union
BIA	Best Interest Assessment
BID	Best Interest Determination
BSRP	Building Self Resilience Project
CPD	continuous professional development
CRRF	Comprehensive Refugee Response Framework
CTEs	Colleges of Teacher Education
DLIs	Disbursement Linked Indicators
DLRs	Disbursement Linked Results
DPs	Development Partners
DRDIP	Development Response to Displacement Impact Project
DRC	Danish Refugee Council
E&S	Environmental and Social
ECCD	Early Childhood Care and Development,
ECCE	Early Childhood Care and Education
EFCCC	Environment, Forest, and Climate Change Commission
EIA	Environmental Impact Assessment
EMIS	Education Management Information System
EOC-DICAC-RRAD	Ethiopian Orthodox Church Development and Inter-Church Aid Commission Refugee and Returnee Affairs Department
EOP	Economic Opportunity Program
EP	Environment Protection
EPLUAB	Environment Protection, Land Utilization and Administration Bureau
EPMEDA	Environment Protection, Mining and Energy Development Agency
EPRDF	Ethiopian People’s Revolutionary Democratic Front
ESDP	Government’s Education Sector Development Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESMSG	Environmental and Social Management System Guideline
ESSA	Environmental and Social systems Assessment
ETP	Education and Training Policy
FGM	Female Genital Mutilation
GDP	Growth Domestic Product
GEQIP-E	General Education Quality Improvement for Equity
GER	Gross Enrollment Rate
GES	Global Education Strategy
GoE	Government of Ethiopia
GPI	Gender Parity Index

GRB	Gender Responsive Budgeting
GRM	Grievance Redress Mechanism
GTP II	Second Growth and Transformation Plan
IAS	Implementing Agencies
ICT	Information communication Technology
IE	Inclusive Education
IGAD	Intergovernmental Authority for Development
IMC	International Medical Corps
IPF	Investment Project Financing
IPs	Implementing Partners
IRC	International Rescue Committee
KG	Kindergarten
M&E	Monitoring and Evaluation
MoE	Ministry of Education
MoEFCC	Ministry of Environment, Forest and Climate Change
MoU	Memorandum of Understanding
NCRRS	National Comprehensive Refugee Response Strategy
NGOs	Nongovernmental Organizations
NRC	Norwegian Refugee Council
NRDEPP	Natural Resource Development and Environmental Protection Project
NRES	National Refugee Education Strategy
OAU	Organization for Africa Union
OHS	Occupational Health and Safety
OP/BP	Operation Policy/Bank Procedure
OSD	Organization for Sustainable Development
PAD	Project Appraisal Document
PCO	Program Coordination Office
PCRs	Physical Cultural Resources
PDO	Program Development Objective
PforR	Program-for-Results
PPA	Program Partnership Agreements
PPE	Personal Protection Equipment
PTSA	Parents-Teachers-Students Association
PWD	Persons with Disability
RaDO	Rehabilitation and Development Organization
RCC	Refugee Central Committee
REBs	Regional Education Bureaus
REPA	Regional Environment Protection Bureau
RPLRP	Regional Pastoral Livelihoods Resilience Project
S4D	Sports for Development
SDG	Sustainable Development Goal
SEE	Save the Environment Ethiopia
SGBV	Sexual and Gender Based Violence
SNE	special needs education
SWOT	Strength, Weakness, Opportunities, and Threats

TEVT	Technical Education and Vocational Training
ToRs	Terms of Reference
TTCs	Teachers Training Centres
UIIDP	Urban Institutional and Infrastructure Development Program
ULGDP	Urban Local Government Development Program
UN	United Nations
UNDP	United Nations Development Programme
UNHCR	United Nations Higher Commission for Refugees
UNICEF	United Nations International Children's Emergency Fund
WEOs	Woreda Education Offices
WHO	World Health Organization
WVI	World Vision International

Executive Summary

The World Bank proposes Additional Finance (AF) for General Education Quality Improvement for Equity (GEQIP-E), a Program-for-Results (PforR) financing. GEQIP-E AF has the same Program Development Objective (PDO) with GEQIP-E, i.e., to improve internal efficiency, equitable access, and quality in general education (O-Class to Grade 12). However, the results framework will be slightly modified to include new DLRs and associated changes to key performance indicators. Minor amendments to the Results framework from the Original Program will also be made.

PforR basically aims at strengthening the government's systems in place and institutional capacity for implementation, with a shift from inputs to result approach with defined accountability. Thus, the PforR is a new lending instrument through which the World Bank finances the achievement of results rather than the provision of inputs by ensuring environmental and social sustainability of the program. As part of the preparation and appraisal of the proposed AF, GEQIP-E Environmental and Social systems Assessment (ESSA) is updated, since a new counterpart implementing institution, Administration Refugee-Returnees Agency (ARRA), will be involved in addition to Ministry of Education (MoE) and this ESSA is prepared.

The World Bank conducted the ESSA with the objective to assess the capacity of implementing agencies (MoE and ARRA) and other stakeholder's environmental, social and safety management as well as review the existing legal frameworks at operations level and identify potential environmental and social impacts, risks, and opportunities in the education sector, including refugee education. Specifically, the ESSA was conducted to (i) identify environmental and social impacts and risks associated with the Program; (ii) assess the strengths and weaknesses of the legal, institutional, and implementation frameworks; and (iii) recommend measures to strengthen national and regional systems and implementing agencies capacity to deliver the PforR in a sustainable manner.

Hence, the ESSA update mainly focuses on the identification of existing capacities and gaps of MoE, ARRA and their counterparts at all levels including regional education bureaus (REBs), Woreda Education Offices (WEOs), ARRA Zonal Offices, ARRA Refugee Camps, and refugee and host community schools, to achieve the PforR objectives against the range of environmental and social impacts and risks that may be associated with the proposed AF.

The ESSA was contextualized within the framework of the six Core guiding Principles of PforR financing (OP/BP 9.00): (1) General Principle of Environmental and Social Management; (2) Natural Habitats and Physical Cultural Resources; (3) Public and Workers Safety; (4) Land Acquisition and Loss of Access to Natural Resources; (5) Indigenous Peoples and Vulnerable Groups; and (6) Social Conflict.

The ESSA was prepared using different methods of data collection like secondary analysis and primary data collected at field level. Secondary analysis is done based on desk review of relevant government policy, legal and regulatory documents; GEQIP-E ESSA and Environmental and Social Management System Guideline (ESMSG) reports; and other pertinent literature. To collect primary firsthand information from stakeholders, key informants interviews (KIIs) with relevant heads, managers, and experts of implementing agencies at different level like the MoE and ARR in the five refugee hosting regions of Benishangul-Gumuz, Gambella, Somali, Afar, and Tigray regions was conducted. In addition, to understand their challenge and take a lesson from Development Response to Displacement Impact Project (DRDIP) implemented in refugee hosting communities in these five region supported by World

Bank, interviews were made with regional coordinators. Group discussions and community consultations with professional experts and members of the community in the five regions were conducted.

Key findings of the ESSA Update

The proposed AF program has two new DLIs to supporting harmonization of refugee primary schools with MoE and REB services, and integration of secondary schools. These are: (1) Harmonization of services at refugee primary schools; and (2) Integration of refugee secondary education. The harmonization of services at refugee primary schools will be achieved through: (a) Improved in-service training for refugee incentive teachers; (b) availability of Basic School Grants in refugee primary schools; (c) provision of textbooks to refugee primary schools with REBs/Woreda procurement, distribution and monitoring. Integration of refugee secondary education will be realized through (a) Transfer of secondary refugee schools to MoE/REBs administration; and (b) support to host community schools for integration of refugee students. The proposed AF has also the IPF component that include (1) National and Regional Refugee Integration Facilities; (2) Enhanced capacity for harmonization and integration; (3) Innovation to address key challenges in refugee education; and (4) other activities for social inclusion, sport for development, and gender inclusions.

Legal Frameworks

The Government of Ethiopia has the necessary legal frameworks for environmental and social management and institutional arrangement down to local level to ensure consistency with the World Bank six Core Principles of Program for Results (PforR) Financing. The environmental and social legal frameworks of Ethiopia are found adequate. The primary legislations that support environmental and social management of the education sector in Ethiopia are the Constitution, Environmental Policy of Ethiopia, Environmental Impact Assessment Proclamation No. 299/2002, Solid Waste Management Proclamation No. 513/2007; Environmental Impact Assessment Procedural Guideline (2003); Environmental and Social Management Plan Preparation Guideline (2004); National Policies for Equitable Access to Quality Education; National Social Protection Policy; Cultural Policy; National Policy on Ethiopian Women; and other Laws, Strategies, and Guidelines Enforcing Special Support for Vulnerable Groups.

Ethiopia enacted its first Refugee Proclamation in 2004. The Proclamation embodies international refugee laws and principles. Just recently, in January 17, 2019, the FDRE Parliament has passed a proclamation that revised the 2004 refugee law. The country is also drafting its National Comprehensive Refugee Response Strategy (NCRRS) to implement this at the policy level. The revised refugee proclamation and strategy will cater to the implementation of Ethiopia's nine Pledges to the UN Comprehensive Refugee Response Framework. In addition, Ethiopia is signatory to the UN Refugee Convention ratified in 1951, and also to refugee conventions and declarations endorsed by AU.

Even though the environmental and social legal bases are strongly established, the implementation is not consistent across all regions; and varies from one region to another in terms of Environmental and Social Impact Assessment (ESIA) preparation, review and approval; Environmental and Social Management Plan (ESMP) preparation and implementation; preparation and implementation of safety management plan applicable to the respective activities of the Program; monitoring and enforcement of ESMPs; and stakeholder consultation, as required at all levels.

The capacity of implementing agencies (IAs) was found to be weak. The ESSA findings show under MoE that the Environmental and Social Management System (ESMS) was not well established and functional as recommended in the parent GEQIP-E ESSA. Except for the provision of capacity development trainings

on GEQIP-E and the ESMSG, the ESMS has not yet been strengthened as there are no safeguard experts / specialists hired and no offices with well-equipped facilities and budget at any levels including federal. MoE's institutional arrangements and safeguard implementation capacity (the structural and staff capacity) are still weak and the gaps identified during GEQIP-E ESSA have not yet been fulfilled. ARRA also does not have the experience in the Environmental and Social Management of World Bank supported projects/programs. As a result, it lacks well established ESMS, except for an environmental officer at federal level and in two zonal offices (Gambella and Dollo Ado). Therefore, during the proposed AF implementation, environmental and social safeguard issues may be given low attention and safeguard activities may be underestimated by the implementing agencies unless safeguard experts are assigned in the planned Refugee Integration Facility at federal and region levels.

Stakeholder risk perspectives

Different stakeholders were consulted and interviewed to understand and capture their views, opinions, and concerns on the proposed AF program during ESSA update. They welcomed the program and appreciated its forthcoming, indicating that besides improving education quality the program will enable the cohesion of refugee and host communities. The program will enable the refugee and host communities to build social ties and reduce security challenges that occur in the shadow of unfamiliarity between refugee and host communities. There are varied concerns raised by different categories of consulted stakeholders. The four major critical issues that are identified which will have huge implication on the success of the proposed AF: (i) stringent ARRA rules and regulations to access refugee camp schools; (ii) shortage of classrooms, textbooks, and qualified teachers including offices; (iii) lack of sport fields and facilities; and (iv) shortage and lack of pedagogy centers, laboratories, and libraries. ARRA informants indicated their concern regarding the preceding of service integration over the development aspect or activities for the refugees required to enhance their economic and income earning status. The integration of refugee and host communities, according to ARRA, should be systematically and strategically managed through strengthening and developing the economic bases of refugee population. As the proposed AF is supporting integration and harmonization of secondary schools, ARRA expressed concerns regarding the provision of scholastic materials and school uniforms and that there should be no renunciation of this type of assistance for the refugee due to their weak economic status and ability to be self-reliant and sustain themselves.

National teachers hired in ARRA schools, besides better salary, have access to residence rooms within ARRA camps and have transportation services. These teachers are concerned about the potential decrease of their salary scale due to the transfer refugee teachers into the national payroll and worried about losing the additional services packages they have been getting from ARRA as a result of the GEQIP-E AF's harmonization and integration goal of refugee education.

When host community and refugee schools are compared in terms of their quality and services, they differ in some key indicators. Refugee schools are better in terms of the quality of buildings, availability of desks, availability of potable water and teaching aids for teachers, school fencing, and provision of school feeding. In contrast, the host community schools are better in terms of availability of qualified teachers, classroom-student ratio, teacher-student ratio, textbook-student ratio, and provision of short-term and long-term teachers' development trainings. On the contrary, many host community schools' buildings and classrooms are in disrepair. There is a lack of water, fencing, and desks. The main challenges of refugee schools are shortage of classrooms, leading to high classroom-student ratio, teacher-student ratio, and presence of large number of uncertified refugee incentive teachers in first cycle primary schools. Refugee schools also face a shortage of teachers and textbooks. Both the host and refugee schools lack offices for teachers including tables and chairs; lack access roads to schools;

experience stuffy classrooms due to hot weather, lack of fans/ventilators, and iron made walls and roofs; and lack of sport fields, play grounds, and pedagogical centers in most schools.

In some regions like Tigray and Somali, refugee and host community students attend their education in the same compound but in separate blocks. Whilst school feeding and scholastic materials including school uniforms has been provided in ARAA administered refugee primary schools but school feeding is missing in host community schools, even where they are located in the same compound as is the case for two of the sixty primary schools. In addition, refugee schools and classrooms are built from bricks and well finished with desks. Whereas, some of host community students' attend their education in shades made of grasses and corrugated iron roofing sheets and without desks in in the same compound. This concern raised by host communities and government officials that will potentially be a source of conflict and will affect refugee and host community integration.

Field level communities and stakeholder consultation findings show integration and harmonization of refugee and host community education has been started with support of UNICEF, beginning in the 2017/18 academic year at high school level. UNICEF has been constructing model inclusive schools for the host and refugee students at a middling distance taking into account the national standard to help host community students attend. Some of these schools are built on existing land in refugee camps, whereas others are built in new acquired land from the public at an appropriate distance for refugee and host students. Hence, the host and refugee students started attending schools together in the refugee secondary school as well as the host community schools based on availability.

Whilst not a focus of the AF, this inconsistency of service provision also extends to preprimary education. Preprimary education was found much better in the refugees than the host communities. In all refugee camps, there are preprimary educations with varied naming like O-class, Early Childhood Care and Development (ECCD), Kindergarten (KG) or accelerated school readiness. There are better and comfortable rooms, Montessori materials, and kindergarten teachers. However, most host community children lack preprimary education, and the available preschool education lacks properly built classrooms and Montessori materials.

Absence of teachers' residence houses was a challenge in most host community schools visited. In refugee schools, there were teachers' residence houses provided by ARRA, but the teachers live in a group, that is, two or three teachers live sharing a room. There are no ICT facilities, a shortage of pedagogy centers, and laboratories common to both refugee and host community high schools.

Refugees often face exclusion from or tensions with host communities as a result of competition for services and resources, including education services. While some refugee hosting regions, such as Afar, Somali, and Tigray, have experienced relatively low levels of tension and good integration, other regions, particularly Gambella, have experienced significant tensions and in some cases violent confrontations. As a result of the AF integration of secondary schools, there will be greater numbers of refugee children accessing host community schools (though there will also be a greater number of host community schools). This may create risk of escalating tensions unless properly managed through actions such as the planned sports and social cohesion activities under the project. However, on the other hand, the project aims to make service provision between refugee and host community education more consistent, which may diffuse some of the conflict over service quality. There will also be increased opportunities for interaction and mutual understanding created by the integration of secondary schools.

Vulnerable Groups

In terms of safeguarding of vulnerable groups, the assessment also revealed that sexual and gender-based violence (SGBV) was rarely reported. Even though the reporting was rare, global and federal data

literature shows that not all SGBV cases are reported by survivors as due to fear of discrimination and ostracization from the community. Given global and federal data (e.g. on domestic violence noted in the ET DHS), it can be expected that a vulnerable group like female refugees are exposed to that risk. Besides, the presence of a structured referral system itself shows the seriousness of the cases. School based SGBV reports in most regions were also negligible and not raised as an issue or concern in both refugee and host communities. However, there is a well-organized referral system to help SGBV survivors, composed of concerned bodies including RCCs, ARRA protection officers, NGOs, Woreda and regional security and justice bodies including police officers, and social workers to access medication, legal, and psychological support in all refugee camps. A survivor might report their case to an NGO social worker, community mobilizer, ARRA health worker, protection officer or a member of an RCC based on his/her convenience and comfort. Upon receiving the case, the receiving body refers the survivor to social workers for any psychosocial counseling and to health workers if urgent medication support is needed. If survivors require legal support, the case will be referred to ARRA protection officers and social workers will follow-up the status of the reported case representing the survivor. The social workers take the lead role and work in collaboration with the Woreda Health, Police and Justice Office to ensure survivors' safety and confidentiality as well as prosecution of the perpetrators and bring to justice. A referral for legal support is under the auspices of ARRA, while NGOs working on SGBV have the responsibility to follow-up referred cases and provide psychosocial support and counseling to the survivors.

There are safe places (in some areas referred as wellness centers) in the refugee camps or schools for survivors. However, in host communities the survivors are forced to stay in their relatives' house or temporary shelters which are not user friendly. In addition, existing wellness centers in refugee camps or schools are poorly equipped. The wellness centers are places where the survivors of SGBV receive psychosocial counseling to tackle feeling of loneliness and stigma, physical rehabilitation, skill trainings, and can be re-integrated into their communities.

There are different types of vulnerable groups in the host and refugee communities which require special attention in GEQIP-E AF such as special needs children, unaccompanied children (<18 years), and ethnic minorities, particularly in the refugee camps (see 5.4.1 and 5.4.2 for a breakdown of numbers). Many refugee special needs students do not attend schools. Most refugee schools are not accessible to special needs students as their environment is poor, the infrastructure is not designed to be accessible, and there are no special needs teachers and teaching aids. There are currently few inclusive education centers in the accessible vicinity of camps for special need children/ students.

Literature and field assessments show a growing number of these vulnerable groups in all refugee camps who require special attention and support like psychosocial and accommodation support. The numbers of unaccompanied and separated children are particularly high for Eritrean refugees in the Tigray region. Children constitute 58% of the total refugee population and literature indicates 16.6% of children in the Tigray refugee camps are unaccompanied and separated children.

There are also ethnic minorities in the refugee camps. In Shire refugee camps, ethnic minorities are the Kunama who migrated from Eritrea. The Kunama ethnic groups face challenges in learning with their mother-tongue as there is a lack of mother-tongue textbooks prepared using the Latin alphabet, including specialized teachers in the two Shimelba refugee schools. Ethnic refugee minorities are also found in Assosa camps like the South Sudanese, Congolese, Rwandese and Cameroonians.

Summary of benefits and risks

The proposed Additional Finance (AF) Program is expected to have both environmental and social benefits and risks associated with its implementation. The following are key social benefits for refugee and host communities upon its implementation: (i) Equitable Access to Education for refugee and host communities; (ii) Enhanced Gender Equality in Education; and (iii) Promoting Social Inclusion and Cohesion among refugee and host communities and students.

The identified environmental negative risks include: (i) Safety risks related to storage, handling and disposal of laboratory chemicals; (ii) Risk of disposing ICT facilities; (iii) Workers and community safety risk during school expansion construction; (iv) Risks related to spread of malaria; (v) Risks related to weak E&S management capacities. In addition, there are social risks associated with (i) Weak Environmental and Social Management System (ESMS) in Implementing Agencies; (ii) Risk of escalating ethnic tension and conflict of host and refugee communities; (iii) Prevalence of large refugee incentive unqualified teachers; (iii) Risk related to frequent absenteeism and high dropout of refugee students; (iv) Risk of escalating girls sexual harassment and SGBV; (v) Lack of support to mother-tongue education; (vi) Lack of support to special need education; (xi) Variation in refugee and host community students' admission system; (xii) Risk related to classroom standard difference and provision of school feeding and scholastic materials for refugee students; and (xiii) Risks related to language barriers including medium of instruction.

The ESSA shows that the overall risk rating for the proposed program on the environmental and social issues and safety management perspective is 'substantial' as there are weak ESMS in implementing agencies (MoE and ARRA); high tendency of ethnic conflict given the weak and volatile relationship between refugee and host communities in Gambella and some camps in Benishangul-Gumuz; risks associated with sexual harassment and Gender Based violence (GBV); and prevalence of larger number of vulnerable groups like unaccompanied minors, particularly girls and special needs children.

Assessment of environmental and social legal frameworks and procedures, including institutional capacity and practices indicate the existence of limited environmental and social risks associated with the proposed Program implementation. The analysis indicates that the five core principles of the PforR financing are applicable (Core Principle 1: General Principle of Environmental and Social Impact Assessment and Management; Core Principle 2: Natural Habitats and Physical Cultural Resources; Core Principle 3: Public and Worker Safety; Core Principle 4: Land Acquisition,; Core Core Principle 5: Indigenous Peoples and Vulnerable Groups; and Principle 6: Social Conflict). There is land acquisition concern due to UNICEF and EOC-DICAC funded construction of secondary high schools on newly acquired land for the integration of host and refugee communities' students. To address any legacy issues related to land acquisition for secondary high schools which may benefit from (or supported by) the AF, a social and environmental due diligence assessment is required for high schools whose construction is ongoing and completed on newly acquired land.

The overall implementation of the AF will be carried out using existing government systems and mandates. The day-to-day management of the AF will be carried out by a dedicated National Refugee Integration Facility, established within the existing GEQIP-E Program Coordination Office (PCO) at MoE. Regional Refugee Integration Facilities, established within REBs, will oversee regional and Woreda level implementation and provide REB representation on the Steering Committee. The AF will be overseen by a Refugee Education Steering Committee, established within MoE with representation from ARRA, UNHCR, UNICEF and other key stakeholders, as well as from Regional Education Bureaus (REBs).

The institutional arrangement for the management of environmental and social impacts and risk under MoE and ARRA is found to be weak. The ESMS establishment under MoE as proposed in the GEQIP-E ESSA is not operational, except for a few steps exerted like preparing the ESMSG, establishing the GRM,

and providing awareness raising workshops. Therefore, to effectively address the identified environmental and social risks and impacts and ensure compliance of the AF activities implementation with the PforR core principles a safeguard specialist should be hired at MoE and Gambella within the National Refugee Integration Facility to be established in GEQIP-E Coordination Office. In Gambella, a safeguard specialist is proposed due to the presence of almost half of the refugee population in Ethiopia in the region and prevalence of volatile ethnic tension and refugee and host community interaction. Other four refugee hosting regions (Tigray, Benishangul-Gumuz, Somali, and Afar) will have safeguard focal persons dedicated to handle the implementation of environmental and social safeguard issues.

Grievance Redress Mechanism (GRM)

Redressing social issues amongst refugee and host communities has traditionally been handled using the existing cultural redress mechanisms. In addition, in refugee hosting areas, there are two ways to redress conflicts and complaints: (i) Intra-conflict redress mechanism; and (ii) Inter-conflict redressing mechanism. There is a jointly established functional conflict redress committee, named the Security and Protection Committee, in all refugee hosting regions, commonly composed of local government bodies, ARRA, and RCCs to prevent and address any conflict between the refugee and host communities. There are also a number of other mechanisms and referral pathways, including Community-Based Protection.

The ESSA shows the existence of well-established GRM under ARRA and its zonal counterparts that will be used for the AF supported with trainings. However, under MoE there is an attempt and steps taken to strengthen the existing GRM under the Ethic and Anticorruption Directorate. Therefore, activities to further strengthen the active functionality of the existing GRM under MoE are required through trainings and awareness raising workshops at federal and regional levels. The procedure of grievance redress and the manuals required for GRM will be included in the ESMSG.

According to World Bank Grievance Redress, communities and individuals who believe they are adversely affected by a Bank-supported project may submit complaints to existing project-level grievance redress mechanisms or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns and impacts. Project affected communities and individuals may submit their complaint to the Bank's Independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of the Bank's noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the Bank's attention and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's corporate GRS, see <http://www.worldbank.org/GRS>, and Bank's Inspection Panel, see www.inspectionpanel.org.

Recommended Program Action Plan (PAP) for Environment and Social Management: The following PAP on Environment and Social Management is recommended:

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
1	Ensure establishment of strong Environmental and Social Management System (ESMS) and strengthening its functionality	1. Employment of three Environmental and Social Safeguard Specialists (one at national and one each for Gambella and Benishangul-Gumuz regions) in Refugee Integration Facility as a pre-condition to pilots	Percentage (100%) of staff in place at Refugee Integration Facility	At national and region levels	National Refugee Integration Facility, MoE and ARRA	Within three (3) months after program of program effectiveness	ESMS established Federal & Regional Safeguard staffs in place Safeguard training documents produced	GEQIP-E AF IPF Capacity Building through Refugee Integration Facilities
		2. Assign safeguard focal persons in the four regions (Benishangul, Somali, Afar, & Tigray) and Woreda level as a pre-condition to pilots	Percentage (100%) of focal persons assigned at Woreda and school levels	Regional and Woreda levels	National Refugee Integration Facility, MoE and ARRA	Within three (3) months of program effectiveness	Regional and Woreda Safeguard focal points in place	GEQIP-E AF IPF Capacity Building through Refugee Integration Facilities

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		3. Update ESMSG to address identified environmental and social risks	Actions taken to prepare the ESMSG	At national level	National Refugee Integration Facility or hired consultant	ToR within one month of program effectiveness ESMSG prepared within six (6) months of program effectiveness	ToR Produced ESMSG document produced	GEQIP-E AF PAP 3.1
		4. Capacity development through training by developing a training plan and implement in a timely manner on environmental and social issues	Percentage (100%) staffs trained	Federal, regional, Woreda and school levels	National and Regional Refugee Integration Facilities	Training MoE, REB and WEO staff on safeguard instruments (ESMSG & ESSA) and requirements every year throughout program period	Safeguard training documents produced Safeguards training reports every six (6) months	GEQIP-E AF PAP 3.2

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
2.	Strengthening the functionality of existing GRM at federal, regional and camp levels and establishing accessible new GRM for workers on project pilot activities at site level	1. Develop and put in place responsive GRM guidelines and procedures including compensation procedures, timely and appropriate response for grievances	GRM guidelines and procedures produced	Federal, regional, Woreda and school levels	National and Regional Refugee Integration Facilities	Within six months of program effectiveness	GRM guidelines and procedures produced	GEQIP-E AF PAP 3.1
		3. Conduct awareness raising activities for project affected people and communities on GRM guidelines and safety measures using easily accessible media and considering the local context of the targets	Awareness raising activities conducted	Regional, Woreda, School, and camp levels	National and Regional Refugee Integration Facilities	One awareness raising activity conducted per region per quarter	Reports on awareness raising activities including number of participants and gender	GEQIP-E AF PAP 3.2
3	Support for vulnerable groups (i.e., special need)	1. Establish Inclusive Education Resource Centers	Nine (9) Inclusive Education Resource	At camp level depending on the	National and Regional Refugee Integration Facilities, ARRA,	Complete three resource centers at the end of year 1	Nine (9) Equipped and staffed Special needs resource	GEQIP-E RA 2.3 687 Inclusive Education

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
	children, unaccompanied and segregated refugee children, and ethnic minorities) in refugee and host community schools	at central location for refugee and host community students with special needs and equip with the necessary special need materials and trained professionals	Centers established and equipped with the necessary resources and staff	number of special need children	UNHCR, and REBs	Complete three resource centers at the end of year 2 Complete three resource centers at the end of year 3	centers in areas close to refugee camps for utilization both by the refugee and host community students Report on number of children served annually by each center (broken down by gender and vulnerability category)	Resource ¹ Centers to be established for special need children/ students Intermediate Results Indicator 8.11a and 8.11b
		2. Include vulnerable school children with non-special needs to share Program benefits	Inclusion of vulnerable school children	School level	National and Regional Refugee Integration Facilities, ARRA, and REBs	Y1-4 Annual	Report on types of benefits delivered and number of beneficiaries by gender and vulnerability	GEQIP-E PAP 3.3.

¹ 9 Inclusive Education Resource Centers should be established for special need students in areas close to refugee camps for utilization both by the refugee and host community students

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		3. Deliver awareness raising for the community on opportunities for special needs education and teachers on ways to make their classrooms and content more accessible to special needs students	Awareness raising activities conducted	School level	Regional Refugee Integration Facilities	Y1-4	One awareness raising activity per camp per year	GEQIP-E AF IPF capacity building component
		4. Support for ethnic Kunama, Murule, and others on mother-tongue education	100% ethnic minorities mother-tongue education feasibility assessment conducted Feasible mother tongue programs implemented	Shire, Gambella and Assosa Camps	Hired consultant	Year one (1) and two (2) of the Program	Prepared ToR year 1 Produced Feasibility assessment report in year 2 Implementation of the results of the assessment in year 2	GEQIP-E AF IPF capacity building component

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		5. Effective use of community organizations, women groups, youth groups and other community forums to facilitate community conversations in targeting vulnerable groups	Dialogues with community organizations, women groups, youth groups and other community forum	Woreda and school level	Regional Refugee Integration Facilities	Y1-4	One dialogue per camp per year	GEQIP-E AF IPF capacity building component
4	Balanced service provision and quality of classroom difference among host and refugee schools and for students attending the same schools in the same compound	1. Develop guidelines ² on school and student level support) with the aim of both maximizing enrollment and standardizing conditions and their impacts between refugee and host students.	Guidelines produced	School level	National and Regional Refugee Integration Facilities, ARRA, UNHCR, and REBs	Year one (1) of the program	Guidelines for standardizing service provisions developed.	GEQIP-E AF IPF capacity building component

² The standardization guidelines should be aligned with current MoE minimum standards and balance the differing socio-economic situation of refugees & host communities with the need for balanced service provision to enhance social cohesion. The guidelines may over areas such as school facilities, classroom equipment, teacher/student ratios, school feedings & school support such as scholastic materials and school uniforms.

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
5	Conduct social and environmental due diligence assessment and prepare and implement Action Plan on feasible corrective measures	1. Conduct social and environmental due diligence assessment and implement identified mitigation measures, if any, to address any legacy issues related to land acquisition for construction of secondary schools on newly acquired land supported by UNICEF and DICAC to ensure the acquired land is in compliance with World Bank PforR financing Core Principle 4: Land Acquisition	100% due diligence conducted	Woreda and School levels	Refugee Integration Facility or Hired Consultant	<p>Within one month of program effectiveness</p> <p>Within six months of program effectiveness</p> <p>Year One</p> <p>Annual reports on corrective measures</p>	<p>Prepared TOR</p> <p>Produced Due Diligence Assessment Report</p> <p>Action Plan on feasible corrective measures</p> <p>Reports on corrective measures (based on the finding of the due diligence assessment) implemented, if any.</p>	<p>GEQIP-E AF Environment and Social Commitment Plan, point 7</p> <p>IPF Capacity building component</p>

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
6	Prevention of SGBV, FGM and harassment including girls' early marriage	1. Conduct community dialogue and mobilization to reduce early marriage, FGM and sexual harassment	Number of community dialogues	Camp and School levels	National and Regional Refugee Integration Facilities, ARRA, UNHCR, MoE, and REBs	One community dialogue every quarter in the five regions throughout program period (four community dialogue in every region per year)	Community dialogue and mobilization conducted	GEQIP-E AF IPF capacity building component through pilots and placement of communications specialists within Regional Refugee Integration Facilities
		2. Conduct communications campaign to raise awareness on sexual harassment, FGM, SGBV and early marriage practices	Communications campaign conducted	Woreda, school and community levels	National and Regional Refugee Integration Facilities (Communications Specialists)	Y1 TORs and campaign plan Y2 implementation of campaign Y3 report and lessons learned	Prepared TORs Campaign plan developed Report on impact and lessons learned from communications campaign	GEQIP-E AF IPF capacity building component through pilots and placement of communications specialists within Regional Refugee Integration Facilities

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		3. Strengthen and support girls' clubs established in refugee and host community schools	Number of girls' clubs strengthened and supported	School level	National and Regional Refugee Integration Facilities, ARRA, UNHCR, MoE, and REBs	Ten girls' clubs strengthened and supported every year throughout program period (two girls' club per refugee hosting region per year)	Established girls' clubs	GEQIP-E AF IPF capacity building component to custom girls' clubs guidelines
		4. Prepare Code of conduct on SGBV for teachers in refugee and host communities to sign as part of the teacher upgrading and training activities of the project.	Established SGBV code of conduct	School level	National and Regional Refugee Integration Facilities ARRA, MoE and REBs	Code of conduct will be prepared in Year one (1) of the Program period Teachers undergoing upgrading training will sign code of conduct each year thereafter	SGBV code of conduct Report on the number of teachers signing the code of conduct	GEQIP-E AF PAP 3.5
7	Strengthen the institutional capacity & coordination of	1. Provide continued training to all	Number of trainings given to Regional,	At regional, zonal, and	National and Regional Refugee Integration	Three staffs per year per region throughout	Adequate capacities on GEQIP-E AF	

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
	the environment and social regulatory agencies with special focus on EIA and Environment monitoring directorates at regional and woreda offices	staff of ESIA, Environment and social monitoring directorates of regional and woreda level environment protection offices on GEQIP-E AF safeguard instruments such as ESSA, ESMSG, etc to help support its implementation and monitor progress	zonal, woreda environment staffs of BoE, REPA. ARRA trained on ESSA, ESMSG and EIA methodologies.	woreda levels	Facilities, REPA and woreda level offices	program implementation.	safeguards instruments in the regions and woreda environment offices created Reporting annually on number of personnel trained	

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
8	Strengthen workers and community safety prevention at workplaces	1. Develop/ adapt safety manuals on safe storage, use and disposal of laboratory chemicals in schools (linked with ESMSG) ensure availability of first aid kits in labs and provide safety training to relevant school staff.	Safety manuals on chemical storage, use and disposal prepared, training, first aid kits distributed to schools	MoE and REBs	National and Regional Refugee Integration Facilities, and Federal and regional Ministry and Bureaus of Labor and Social Affairs	Prepared together with the ESMG indicated in Action item one, sub item three.	ESMG report inclusive of community and workers safety management procedures Reports on occupational health and safety kits distributed to workers involved in use and disposal of chemicals in schools	GEQIP-E AF PAP 3.6

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		2. Provide training to increase supervisory capacity of Woreda offices and coordination with Labor and Social Affairs offices to inspect occupational health and safety	Training provided occupational health and safety	Woreda	National and Regional Refugee Integration Facilities in coordination with Labor and Social Affairs offices	Five (5) staffs trained in each five refugee hosting regions every year (25 staffs very year)	Annual reports on occupational health and safety trainings	GEQIP-E AF PAP 3.6.
		3. Include worker and public safety prevention clauses and sanctions for not implementing in the civil works contracts	Percentage (100%) of civil work contracts with safety clauses added	Civil work at woreda, school and camp level	National and Regional Refugee Integration Facilities, and regional and woreda social affairs office level	During program implementation	Annual reports from contractors on H&S	GEQIP-E AF PAP 3.6.
		4. Increase protection capacity of local ARRA offices for the security of	Protection capacity increased	Zonal and camp level	Zonal and camp level ARRA	Capacity building applications submitted every year	Annual ARRA request to Regional Integration Facility for	GEQIP-E AF IPF capacity building component

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		education personnel as necessary					capacity building funding on school level protection Annual reports on funded activities	
9	Strengthen prevention of impacts to natural habitats and PCRs	1. Strengthen the guidance for management and conservation of natural habitats and physical cultural resources as well as chance find procedures by ensuring its incorporation in the ESMSG.	Update ESMSG consisting of management and conservation of natural habitats and physical cultural resources as well as chance find procedures prepared and distributed	National and regional level	Contractors	Reports two months before and two months after sports pilot activities	Reports on prevention of impacts to natural habitats and PCRs from contractors before and after pilot activities	GEQIP-E AF IPF within sports pilot activities
10	Mitigate risk of tensions within and between host and refugee communities	1. Strengthen redressal mechanisms utilized in mitigating local tensions	Redressal mechanisms strengthened	Woreda level	Regional Refugee Integration Facilities, MoE, and ARRA	Within six months of program effectiveness	Budget in place report	GEQIP-E AF IPF within social cohesion pilot activities and capacity building component

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		2. Involve students within the running of the GRMs to ensure child-friendly nature.	Established student run conflict management	School	National and Regional Refugee Integration Facilities, MoE and ARRA	Within six months of program effectiveness	Annual report on involvement of students in GRMs	
		3. Integrate social cohesion into all community dialogues and awareness raising activities	Dialogues include elements of social cohesion enhancing content	Woreda and school level	National and Regional Refugee Integration Facilities	See timelines for community dialogues & awareness raising activities at PAP 2.3, 3.2., 3.4 and 6.1.	Reports on community dialogues and awareness raising activities, disaggregated by sex Reports on community participation in projects disaggregated by sex	GEQIP-E AF IPF capacity building component
		4. Prioritize areas with particular tensions for IPF pilot activities	Prioritized and promoted pilots	Woreda and school level	National and Regional Refugee Integration Facilities, MoE and ARRA	Year 1 (as part of design and site selection for pilot activities)	Reports on Prioritized and promoted pilots Implemented	GEQIP-E AF IPF capacity building component through pilot activities

1. Introduction

1.1 Background

Ethiopia, located in the Horn of Africa, has an area of 1.1 million km². The country has more than 90 ethnic and linguistic groups and a population of nearly 100 million (World Bank, 2015). With an annual growth rate of 2.5 percent, Ethiopia's population is expected to reach 130 million by 2025. More than 80% of the population lives in rural areas, although urbanization is increasing as workers move from agriculture towards manufacturing and services sectors.

Ethiopia has a federal system of administration, established in the early 1990s, with nine autonomous regional states and two chartered cities³. The Ethiopian People's Revolutionary Democratic Front (EPRDF) has been in power in Ethiopia since 1991. Decentralization of governance to the regional and *woreda* levels has been actively pursued since 2003. Ethiopia has experienced fast economic growth over the past decade (World Bank, 2015). Real GDP growth averaged 10.9% annually (8% per capita) in 2004-14, according to official data, and contributed to the reduction of extreme poverty. The recent El Niño drought slowed growth in 2015/16, but even in this year GDP growth was estimated at 8.5%, a rate that still places Ethiopia among the fastest-growing economies in the world.

Strong and robust economic growth and development will necessarily have to rely on the country's human capital. In 2015, the Government launched its latest development strategy, the Second Growth and Transformation Plan (GTP II), which aims to accelerate structural transformation. GTP II (2015/16 to 2019/20) aims to continue improvements in physical infrastructure through public investment projects and to transform the country into a hub for light manufacturing. As indicated in the GTP II, the central objective of Ethiopian national strategies is to progress to a lower middle-income economy by 2025.

GTP II has set ambitious targets for the Ethiopian education sector. With regard to general education, it is planned to increase primary education (grade 1-8) Net Enrolment Rate (NER) from 96.9 percent in 2014/15 to 100 percent by 2019/20. Similarly, it is targeted to increase the general secondary education NER from 40.5 percent in 2014/15 to 79 percent by 2019/20 and to narrow the gap in general education participation between rural, urban and regions.

In regards to special needs education (SNE), 251,054 children with disabilities were enrolled in general education, 89% in primary cycles in 2015/16. There are more boys than girls with special needs attending primary school, 56 percent male and 44 percent female. In GTP II, primary education (grade 1-8) gross enrolment rate of children with special needs is planned to increase from 4.4 percent in 2014/15 to 15 percent by 2019/20.

Ethiopia's basic education system has made rapid progress in recent years, but challenges remain. Between 2011 and 2015, the number of students enrolled in primary education has increased by 21 percent and the number of students achieving basic proficiency or higher in all subjects increased by 57 percent; however, as of 2016/17, only 53.5 percent of enrolled students remained in school until grade 5, and the primary completion rate (PCR) in grade 8 was only 54.1 percent. Girls' rates of dropout are consistently higher than boys', and only 52 percent of female students complete grade 8, versus 56 percent of boys (MoE, 2016/17).

³ The Regional States are Afar, Amhara, Benishangul-Gumuz, Gambella, Harari, Oromiya, Somali, SNNPR (Southern Nations, Nationalities and Peoples), and Tigray. The chartered city administrations are Addis Ababa and Dire Dawa.

Issues of service delivery and equity are particularly severe in several emerging regions of Afar, Gambella, Benishangul-Gumuz, and Somali. While 80 percent of enrolled students in Addis Ababa survive to grade 5, the proportion in the Gambella and Afar regions, for example, are 49 percent and 29 percent respectively, as of 2016/17. These disparities reflect inequities in service provision. While the primary school student has 4.2 textbooks, the averages for Gambella and Somali regions are just 0.8 and 0.3 respectively. By secondary level, differences in access between regions become extreme, with GER in grades 9-10 as high as 74 percent in Tigray and as low as 15 percent in Somali and 16 percent in Afar region, reflecting high rates of poverty and the impact of low rates of primary completion. Gender imbalances are particularly severe in these emerging regions: in the Somali region, for example, fewer than half of enrolled girls - 45 percent - survive to grade 5, versus 58 percent of boys (MoE, 2016/17).

To address these limitations, the ESDP V identifies three priorities for the basic education sector: (i) capacity development for improved management; (ii) general education quality; and (iii) general education access, equity, and internal efficiency. Implementation of these priority reform areas is carried out by MoE and supported by the GEQIP-E through a range of interconnected reforms including enhancements to quality assurance and inspections; improvements in the distribution of grants to schools; development of a new strategic framework for teacher training and development, and a new school-based program for teachers' professional development.

Since 2009, the Ethiopian Government has worked to put in place the elements critical to improving students' learning outcomes and completion rates. Funded by multiple donors, a comprehensive program, General Education Quality Improvement Program (GEQIP) has been implemented to improve the quality of general education. The focus of this program has been to increase the supply and deployment of qualified teachers; provide teaching and learning materials; and disburse school grants. Student-input ratios and the quality of inputs have improved markedly. Equally significantly, learning outcomes at the primary level have modestly improved. Both achievements are commendable, especially given the huge increases in enrollments. Ethiopia has avoided the deteriorating education quality that often accompanies a rapid expansion of access. In response to government's request for support to improve quality of education, GEQIP-E was prepared and its implementation started 2018, with Program Development Objective "*to improve the internal efficiency, equity, and quality of general education.*" The Program focuses on three key result areas: (i) Internal Efficiency, (ii) Equity, and (iii) Quality.

Ethiopia has the second largest population of refugees in Africa, with more than 900,000 refugees, predominantly of Eritrean, Somali, Sudanese and South Sudanese origin. The population has increased rapidly in recent years, with 109,851 new refugees arriving in 2017 and an additional 38,798 arriving between January and August 2018.

An estimated 350,000 refugees are of school age and providing them with access to quality education is a challenge. Ethiopia has succeeded in providing schooling to a significant proportion of these refugee children, but issues of access remain: in 2016/17, the Gross Enrollment Rate (GER) in grades 1-4 was 78 percent, versus 141 percent in the general population. By grades 5-8, GER fell to only 42 percent among refugee children, versus 74 percent in the general population. As of August 2018, a total of 132,563 refugee children were enrolled in primary schools, a GER of 72 percent. The primary completion rate for refugee children in 2016/17 was just 28 percent, versus 54 percent in the general population, suggesting that refugee children are around half as likely to complete primary school. The GER in lower secondary was only 14 percent, versus 47 percent for Ethiopian children, demonstrating severe problems of access to secondary school. The national overall secondary GER was only 10 percent in 2016/17; in 2017/18, this rose to 12 percent (extracted from GEQIP-E AF Draft PAD).

In addition, in the draft PAD, it is indicated that Gender disparities in refugee education are large and persistent. There are seven female refugee students enrolled for every ten males, and only 15 percent of refugee girls complete primary school, versus 39 percent of boys (and 52 percent of girls in the general population). The GER in upper secondary (grades 11-12) for refugee girls was just two percent in 2016/17.

The Government of Ethiopia is committed to significantly increase the access of refugees to education. Ethiopia is a signatory to the New York Declaration for Refugees and Migrants, and a pilot country for the accompanying Comprehensive Refugee Response Framework (CRRF). The Government has announced nine pledges to support CRRF; among these, it has pledged to make education available to all qualified refugees from primary to tertiary level, without discrimination and within the available resources; and has set a target of increasing primary enrollment by 17 percent and secondary enrollment by 89 percent (ARRA, 2017).⁴ The implementation plan for CRRF will be supported by a National Comprehensive Refugee Response Strategy (NCRRS), currently in draft, and an updated Refugee Proclamation (approved by the Parliament on January 17, 2019), providing a legal framework to support refugee integration and establishing the rights of refugees to more equitable access to services.

The AF is proposed to scale up World Bank support focusing on providing access to quality education to refugees and host communities. The proposed AF will support part of the Government's Education Sector Development Plan (ESDP) V (2015/16-2019/20) and envisaged ESDP VI (2020/21-2024/25), particularly Government's commitment to ensure more equitable access to quality education by refugee and host communities. Ethiopia's refugee population is housed primarily in camps with independent school management and service delivery separate from the Ministry of Education (MoE). Equitable provision of services remains an issue with shortages of teachers, textbooks and other inputs in camp-schools. At the same time, the influx of refugees, whose numbers in some emerging regions now exceed those for the host populations, has placed considerable strain on resources at schools in host-communities.

The Government has committed to harmonize delivery of services in camp schools with national systems of service delivery. The AF would support the implementation of this Government's vision of harmonized service delivery to refugees. In the longer term, the Government has adopted a ten-year strategic vision to transition Ethiopia's refugee populations from camps to settlements, with integrated access to local services. The AF will support the harmonization of service delivery in camp schools for key services, as well as greater integration of refugee schools and communities with national school management and host communities at secondary level.

The World Bank proposes supporting refugee and host community education with an additional financing to the parent Program-for-Results (PforR) as well as a parallel Investment Project Financing providing technical assistance including pilot programs. PforR aims at strengthening the government's systems in place and institutional capacity for implementation and finances the achievement of results rather than the provision of inputs. As part of the preparation and appraisal of the proposed AF program, this GEQIP-E Environmental and Social Systems Assessment (ESSA) assesses the implementing agencies' capacity, intuitional and legal frameworks, and identifies possible program risks and impacts. Finally, it also outlines mitigation measures which will be included in the AF.

⁴ The Government's target is to increase primary refugee enrollment to 137,000 and secondary refugee enrollment to 10,300 (ARRA, 2017). In 2016/17, the figures were 116,566 and 5,438 respectively (ESAA, 2016/17)

1.2 Rationale for the ESSA Preparation

In line with the PforR, the World Bank is required to conduct an ESSA to assess the institutional arrangements and its capacity within a the proposed program, for managing environmental and social impacts and risks in a manner consistent with Operational Policy/Bank Procedure (OP/BP) 9.00, *Program for Results (PforR) Financing*. This policy sets out core principles and key planning elements intended to ensure that PforR operations are designed and implemented in a manner that maximizes potential environmental and social benefits, while avoiding, minimizing, or otherwise mitigating environmental or social harms. In terms of environmental and social management, PforR employs a risk management approach, in which process requirements are adapted to the Program context. For the proposed PforR operation, the Bank assesses—at the Program level—the borrower’s authority and organizational capacity to achieve environmental and social objectives against the range of environmental and social impacts and risks that may be associated with the Program.

Hence, the Bank team has prepared this ESSA for the proposed AF using the existing information from the GEQIP-E ESSA and field-based assessments. The assessment targets, based on the scope of the proposed AF Program boundary, to review the robustness of government’s system, as it relates to the AF, in terms of their capacity to plan and implement effective measures for environmental and social impact management at federal, regional and woreda levels. Specifically, this ESSA considers to: (a) promote environmental and social sustainability in the Program design; and promote informed decision-making relating to the Program’s environmental and social impacts; (b) avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program; (c) protect public and worker safety against the potential risks; (e) give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of the underserved people and to the needs or concerns of vulnerable groups; and (f) avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

1.3 Purpose and Objective of the ESSA

1.3.1 Purpose of ESSA

This ESSA was conducted by the Bank team with the aim to assess the key implementing agencies (Ministry of Education- MoE and Administration of Refugees and Returnees Agency- ARRA) organizational capacities and performance to achieve environmental and social objectives against the range of environmental and social risks and impacts that are associated with the proposed AF; as well as conduct a comprehensive review of relevant government systems and procedures that address environmental and social issues related to the Program. Besides, it describes the extent to which the applicable government environmental and social policies, legislations, program procedures and institutional systems are consistent with the six ‘core principles’ of OP/BP 9.00 and recommends actions to address the gaps and enhance performance during the Program implementation.

1.3.2 Objectives of ESSA

Generally, the ESSA aims to ensure that environmental, social, and safety impacts and risks are properly addressed from an early stage of formulating the environmental and social policy and guidelines for the planned AF, and that the PforR implementation should be in line with the Bank’s PforR financing. The specific objectives of the proposed ESSA update for GEQIP-E AF include:

- i) assess the proposed program system performance with respect to the Core Principles of the PforR instrument and identify the potential environmental and social impacts/risks applicable to the proposed GEQIP-E AF interventions;
- ii) explore the magnitude and scale of the environmental and social impacts and risks including the social, psychic and emotional impacts of displacement, conflict/tension among refugee and host communities, different incidents of gender-based violence/sexual abuse and exploitation require an enhanced social analysis for understanding the dynamics and propose mitigation measures to build socio-emotional strength and social cohesion among refugee and host communities.
- iii) evaluate the institutional capacity arrangements of implementing agencies (ARRA and MoE) to manage and monitor the likely environmental and social effects in accordance with the country's own requirements under the proposed Program;
- iv) ensure public participation and dialogue on AF through a process of wide stakeholder consultations to include community groups especially the weaker and vulnerable sections, other development partners, Ministries, civil society and private sector;
- v) establish institutional arrangements for the identification, planning, design, preparation and implementation of activities under the proposed program to adequately address environmental and social sustainability issues;
- vi) specify appropriate roles and responsibilities, and outline the necessary reporting procedures for managing and monitoring environmental and social concerns related to the proposed AF program;
- vii) design enhanced stakeholders' consultation and participation approaches including stakeholder mapping to mitigate risks and enhance benefits identified;
- viii) investigate risk of conflicts between host and refugee populations and their children in the mainstreamed and refugee secondary schools;
- ix) establish clear procedures and methodologies for environmental and social planning, review, approval and implementation of the proposed program;
- x) determine and recommend the training, capacity building and technical assistance for improving implementing agencies and their counterpart capacity needed to successfully implement the provisions of the ESSA update; and
- xi) describe actions to fill the gaps that will input into the Program Action Plan in order to strengthen the Program's performance with respect to the core principles of the PforR instrument;

1.4 Scope of ESSA

This ESSA covers review of the environment and social regulatory and legal policy frameworks of the country. The review includes all relevant proclamations and regulations concerning environment, cultural heritage, and social policies. These include the country Education Sector Development Program V (ESDP V) 2016-20, Growth and Transformation Plan (GTP II) (2015/16 to 2019/20), National Education and Training Policy, Social Protection Policy, Refugee Proclamation, Refugee Education Proclamation and frameworks, regulations related to Gender, Special Needs and Inclusive Education, which consider the application of rights to certain vulnerable and historically underserved groups.

In addition, the ESSA examines and assesses the country's systems currently in place for environmental and social management in line with the proposed AF activities both at national and regional levels. For each activity, the following were carried out:

- Review of the systems and procedures currently under use against the PforR Core Principles. This review is situated within the broader government systems and procedures, as required.

- Review of capacity of the concerned implementing agencies (MoE and ARRA) to implement the systems and procedures in terms of staff capacity, among others.
- Review of the performance of existing systems and procedures under MoE and ARRA. This includes a review of the actual operational experience of the implementation of the Program Action Plan activities identified in GEQIP-E ESSA, including the extent to which the monitoring and evaluation systems for the activities are able to report on the potential environmental and social impacts, and whether such information has been acted upon by management.

Based on the findings of the reviews and fieldwork, the ESSA has made recommendations for actions required to improve the capacity and the system of implementing agencies to meet the requirements of the Core Principles for managing any social and environmental impacts and risks. These recommendations will be incorporated into the AF as part of the Program Action Plan, the Government has to comply with, and/or adaptations of the provisions in the DLIs or the associated IPF TA. The Bank will provide technical support during AF implementation as warranted.

2. PforR GEQIP-E AF Program Description

2.1 AF Program Development Objectives

The AF will support part of the Government's ESDP V and envisaged ESDP VI (2020/21-2024/25), particularly Government's commitment to ensure more equitable access to quality education by refugee and host communities. The PDO of the original project aims to assist the Government of Ethiopia in improving internal efficiency, equitable access, and quality in general education, will be maintained.

2.2 AF Program Scope

The proposed AF will support the expansion of the Program to additional schools in geographic regions serving refugee populations, Afar, Benishangul-Gumuz, Gambella, Somali, and Tigray. Specifically, the AF will (i) introduce updated policy and institutional frameworks for effective integration of refugees into national education service provision; (ii) scale up selected existing activities and incentives to harmonize government systems to deliver quality education to refugee communities; (iii) introduce new activities and disbursement linked results (DLRs) to address challenges in refugee education, particularly to promote greater learning, inclusion and social cohesion, (iv) support the transition of refugee camp-based secondary schools, currently managed by NGOs under the auspices of the Administration for Refugee and Returnee Affairs (ARRA), to national administration by the Ministry of Education (MoE); and (v) provide support to existing MoE schools hosting large numbers of refugees to increase capacity and support integration of refugees students.

2.3 AF Program components

The proposed AF employs the PforR modality for a US\$40 million component to provide incentives to Government for harmonization and integration of refugee education. There, two new DLIs (DLI9 and DLI10) are introduced to existing GEQIP-E, supporting harmonization of refugee primary schools with MoE and REB services, and integration of secondary schools. These are: (i) DLI 9: Harmonization of services at refugee primary schools; and (ii) DLI10: Integration of refugee secondary education. The harmonization of services at refugee primary schools will be achieved through: (a) Improved in-service training for refugee incentive teachers; (b) Availability of Basic School Grants in refugee primary schools; (c) Provision of textbooks to refugee primary schools with REB/Woreda procurement, distribution and monitoring. Integration of refugee secondary education will be realized through: (a) transfer of

secondary refugee schools to MoE/REB administration; and (b) support to host community schools for integration of refugee students.

In addition to the PforR modality, the proposed AF has an IPF component with an additional \$20 million to support capacity building and pilot activities. The IPF components are:

IPF Component 1: Enhanced capacity for harmonization and integration (US\$12 million) that will focus on (i) National and Regional Refugee Integration Facilities, and (ii) Capacity building to develop specialized capacity within MoE to address issues relating to refugee education.

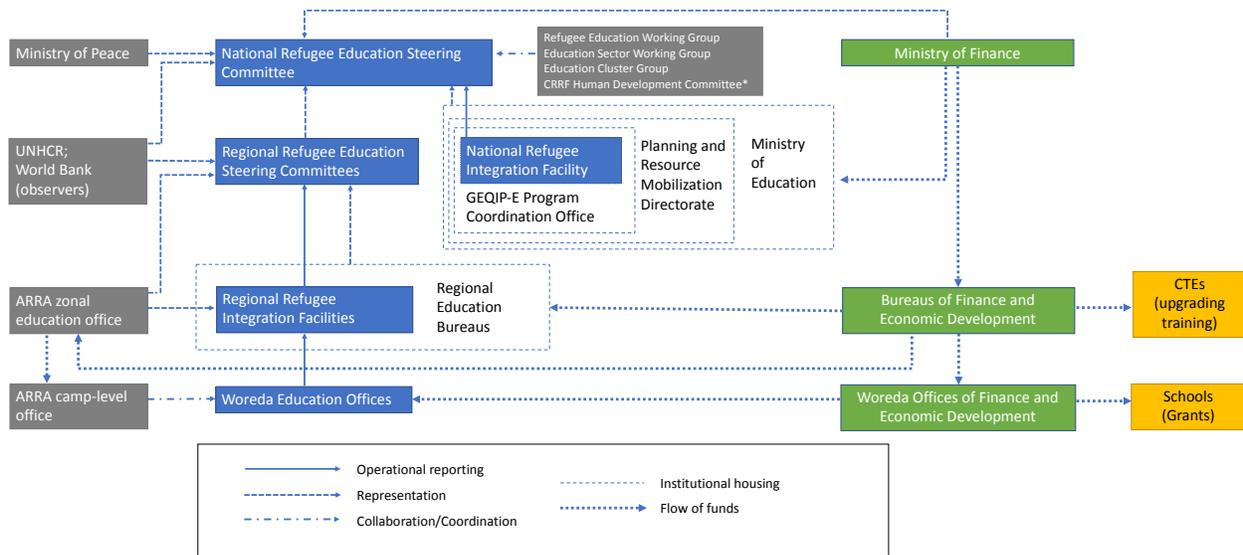
IPF Component 2: Innovation to address key challenges in refugee education (US\$8 million) that targets (i) Disruptive technology for self-directed learning, (ii) Sports for social inclusion, (iii) Empowerment of girls: and (iv) Implementation of pilot activities through local NGOs. Local NGOs will be contracted by Regional Refugee Integration Facilities to conduct implementation of pilot activities.

2.4 AF Program Institutional and Implementation Arrangement

The AF will use the same overall institutional arrangements as the original project. Owing to the need for coordination between MoE, the Ministry of Finance (MoF), ARRA and other stakeholders for delivery of refugee education, additional institutional arrangements will be established for the AF. Strategic oversight will be provided by a National Refugee Education Steering Committee. This will be co-chaired by State Ministers from MoE and MoP with representation from ARRA, UNHCR and World Bank. At regional level, strategic oversight will be provided by Regional Refugee Education Steering Committees, established in each of the main refugee-hosting regions, co-chaired by the REB Heads and ARRA Zonal heads, with representation for BoFEDs.

Day-to-day management of the program will be carried out the National Refugee Integration Facility, established within MoE as part of the GEQIP-E PCO. This approach is intended to embed the program within a wider institutional agenda of integration of refugee education. In addition, the National Facility will have responsibility for management of the PforR program, including measurement and notification of DLR achievement, provision of documentation for verification, Monitoring and Evaluation (M&E), and other reporting. At regional level, implementation of the program will be overseen by the Regional Refugee Integration Facilities. These will contribute M&E and DLR achievement information and documentation to the National Refugee Integration Facility for review and collation.

Institutional arrangements: Refugee Education



*Expected to be introduced under NCRRS

3. ESSA Methodology

The following methods of data collection were used to generate required primary and secondary data⁵ as base for the assessment.

3.1 Desk Review

During desk review, secondary information on good practices and lessons related to previous interventions, identification of existing gaps and plans for effectively dealing with limitations were considered. The literature review has covered: (a) government policy, legal and regulatory frameworks focusing on environmental and social issues in general, and the education sector in particular; (b) GEQIP-E ESSA and ESMSG; (c) ESSAs of other World Bank supported programs such as the Economic Opportunity Program (EOP) and Social Assessments of investment projects like the Development Response to Displacement Impacts Project (DRDIP); (d) other related documents like GEQIP-E AF Concept Note and draft Project Appraisal Document; and (e) commissioned consultancy and academic research reports on gender, special needs, and refugee education.

3.2 Key Informant Interviews (KIIs)

KIIs were carried out with (a) relevant personnel and bureau heads at regional and MoE level responsible for the implementation of the proposed AF; (b) Zonal ARRA coordinators, education officers, refugee camp managers and school directors; and (c) selected host community leaders and refugee hosting woredas education office heads. See Annexes 2 for the issues discussed during the key informant interviews.

3.3 Consultation and Discussion

⁵ See Annex 2 and 4 for details regarding the profile of informants, data gathering tools used and issues covered

To capture the concerns, views and opinions of the host and refugee communities and create awareness about the proposed GEQIP-E AF program, consultations and discussions were made with refugee and host community representatives. Discussions were made with Refugee Central Committee members (RCCs), representatives of the refugee communities, in all visited refugee camps. The host community discussions were conducted with representatives composed of elders, women, youths, and adults to hear their opinions and capture their concerns about the proposed program and environmental and social risks and impacts. Additionally, group discussions were held with: (a) refugee hosting WEO experts as relevant; and (b) refugee camp and host community teachers and students in refugee host woredas. A total of 303 participants (189 male and 114 female) were involved in consultation and discussions conducted during the preparation of this ESSA report (see Table 1 below). Refer Annex 4 for list of discussion and consultation participants.

Table 1: Stakeholder Consultation Participants Summary

Regions	Sex		Total
	Male	Female	
ARRA and MoE	6	1	8
Afar	20	10	30
Gambella	37	22	57
Tigray	30	23	43
Benishagul-Gumuz	58	30	78
Somali	38	28	66
Total	189	114	303

3.4 Field Visit

A range of relevant institutions including MoE, ARRA, and their regional and woreda levels counterparts were visited to conduct interviews, group discussions and consultations. Targeted fieldwork was made to the five refugee hosting regions, namely Afar, Gambella, Benishangul-Gumuz, Somali, and Tigray regions from December 27, 2018 – January 28, 2019. During the fieldwork, the team has visited refugee camps, host and refugee primary and secondary schools as relevant to observe the school environment, classroom and camp situations. Except in Afar, which has only two refugee camps (one camp visited), two refugees camps were observe in each region taking one newly established, and the other, early established to see the variation in perception of host communities and the schools situation. Hence, a total of nine camps were visited during the fieldwork. The observed refugee camps include Shimelba and Hitsats camp in Shire, Berahle camp in Samar, Jewi camp in Gambella⁶, Shrekole and Bambais camps from Assosa, and Awbare and Kebribeyah camps in Jijiga.

Secondary and primary schools located in refugee camps and host communities were also observed. The high schools visited are those which refugee and host students have been attending their education together. The visited schools are presented in the Table 2 below:

⁶ Jewi and Kule refugee camps were planned for observation in Gambella. However, because of security reason, the ESSA team was not able to visit Kule refugee camp.

Table 2: Refugee and Host community schools visited

Camps	Visited Schools	
	Refugee Schools ⁷	Host Community Schools
Shire	Shimelba Secondary School	Shimelba Primary School
	Shimelba Primary School	Hitsats Primary School
	Hitsats Secondary School	
	Hitsats Primary School	
Semera	Berahle Primary School	Berahle Secondary School
Gambella	Jewi Primary School 1	Jewi Primary School
		Itang No. 2 Primary School
Assosa	Sherkole Secondary School	Sherkole Primary School
	Sherkole Primary School	Wamba Secondary School
	Bambasi Primary School	Wamba Primary School
Jijiga	Kebribeyah Primary School	Aw Barre Secondary School
		Kebribeyah Primary School

4. Stakeholders Consultation Summary

4.1 Opinions, Views and Concerns of stakeholders

Different stakeholders were consulted on and interviewed to understand and capture their views, opinions, and concerns on the proposed AF program. Consulted Zonal ARRA managers and education specialists in Shire and Jijiga camps have the awareness about GEQIP-E AF and they indicated that World Bank team has consulted them and they had detailed discussion with the team on the proposed program. They welcomed the program and appreciated its forthcoming at the time of ARRA's budget shortage due to funding cut from implementation partners, mainly from UNHCR, for the refugee education. Furthermore, they recognized the importance of integration and harmonization of refugee education with host communities and noted that the program will help the government to meet the CRRF as well as achieve its pledge on refugee education.

However, ARRA Zonal managers and specialists noted that integration and harmonization of refugee and host community education only seems easy, but it is not. They noted that the administration and management of refugee education is quite difficult given a different context of the refugee community and the limited Woreda Education Offices (WEOs) capacity (in terms of resources like budget, vehicle, and human capacity) and lack of experience on refugee education. Consultation participants noted that refugee and host communities are not alike on the basis of culture and students' behavior due to their refugee status.

Federal ARRA informants indicated their concern regarding the preceding of service integration over development aspect or activities for the refugees required to enhance their economic and income earning status. The integration of refugee and host communities, according to ARRA, should be

⁷ Primary schools are administered by ARRA. Secondary schools are administered by Ethiopian Orthodox Church Development and Inter-Church Aid Commission Refugee and Returnee Affairs Department (EOC-DICAC-RRAD)

systematically and strategically managed through strengthening and developing the economic bases of refugee population. They inquired that 'how will service integration be possible given the poor economic status of refugees', given the fact that the refugees have been surviving on humanitarian relief assistance and they lack sustainable livelihood. Development activities such as creating business, employment opportunities, and enhancing the capacity of refugee to be self-reliant should come before service integration and harmonization. The concern will need to be integrated into the process of educational integration, as refugee households are strongly dependent on relief aid from development partners; for pupils this means dependency on school feeding, provision of scholastic materials, and school uniforms.

As the proposed current AF is supporting integration and harmonization of secondary schools (rather than primary schools where there is school feeding) as the first phase of the long-term government target of comprehensive integration, concerns regarding the provision of scholastic materials and school uniforms are critical as there will be no renunciation of assistance for the refugee due to their weak economic status to be self-reliant and sustain themselves. The AF has to see the options to extend the assistance of scholastic materials and school uniforms for both the host and refugee students who attend the same schools or conduct awareness raising for host communities and students since the denial of these assistance for host community students will pose expectedly considerable psychological impacts like hate as well as the possibility of conflict among refugee and host community students.

Consulted informants at REBs and WEOs welcomed the AF program stressing that the program will help them address their major challenges in refugee and host community schools. In addition, as refugee schools will be handed to local communities when the refugees return to their home country, the integration will help host communities to own standardized schools. Generally, consultation participants indicated that the AF program is timely and will improve the quality of refugee and host community education.

Consulted refugee communities also noted that the program is very crucial for their children to establish friendship ties and integration with host communities. They need the support and integration with host communities, which is the pillar of the AF. As the refugee and host community schools are using the same curriculum, the national curriculum, informants stated, harmonization and integration of refugee education with the mainstream government education will be beneficial to their children including Amharic, which is the national language.

Besides improving education quality, informants noted, the proposed program will enable the cohesion of refugee and host communities. The program will enable the refugee and host communities to build social ties and reduce security challenges that occur in the shadow of unfamiliarity of refugee and host communities. It creates acquaintance among host and refugee community members, which in turn enables to identify new face thieves and other criminals that mingle in the community. Hence, the program will create an opportunity to establish neighborhood, friendship, and social cohesion among the refugee and host communities.

With the support of UNICEF, since 2017/18, integration of refugee and host community education has been practiced by the Building Self Reliance Program (BSRP) as well as work relationships have been established between ARRA and REBs/WEOs. BSRP has been also supporting integration of higher secondary school education through the expansion of classrooms in the existing premises of schools compounds and construction of new high schools on newly acquired land close to the refugee and host community students in all refugee hosting regions. BSRP activities also include: supervision and follow-up, inspection of schools, accelerated school readiness, and provision of short term capacity building trainings together with the regional teachers by the REBs. Informants indicated that the AF program will further strengthen the integration and support provided by REBs and WEOs for improved quality of

education. However, high schools constructed for refugee and host community integration are not to the standard as most high schools lack laboratory, have poorly equipped and unfurnished library, lack of ICT materials and lab rooms, lack of sport fields and materials, no water for students and teachers, etc.

In addition, WEOs and ARRA Zonal offices indicated that they have a longstanding established work relationship. WEOs have been providing textbooks to ARRA on demand bases; while ARRA also has been helping WEOs like schools rehabilitation (deteriorated classes) and provision of desks, among others, in most refugee hosting regions. In some regions like Tigray, there is an agreement between REB and Zone ARRA to work together in publication of textbooks for refugee students to overcome shortage of textbooks and difficulty in purchasing textbooks.

However, concerning the support from REBs and WEOs, ARRA noted that simple supervision and inspection by REBs and WEOs does not yield any good result for refugee schools unless appropriate teaching-learning materials and qualified teachers are included. In addition to supervision and inspection, participants indicated, the support should be all inclusive targeting input-process-output of education that helps to improve quality of refugee education.

In all visited areas, integration of refugee and host community education started particularly at high school level. High school refugee and host community students have been attending their education together either in host community high schools or EOC-DICAC administered refugee high schools. For instance, in Shire camps, 50% of students in refugee high schools in Mai-Aini, Hitsats, and Shimelba camps belong to the host community, whereas more than 10% of students in the host community high school in Adi-Harshi are refugee students. Similarly, in Gambella, Assosa, Semera, and Jijiga refugee camps high school students attend intermixed either in the host community or refugee high schools. There is a better relationship and interaction between the refugee and host communities in the old camps visible than in the newly established camps.

In some camps like Shire, host community students prefer attending refugee schools because of availability of good services like school feeding, good classrooms, and provision of scholastic and others relevant teaching aids because host community students who join refugee schools are equally benefiting and receiving these services. However, primary refugee schools are not open to all host community children because of budget limitation for provision of services. Thus, ARRA restricts the number of host community students who will join and attend the refugee schools.

Consulted national refugee teachers have concerns regarding the proposed AF program. In refugee schools, there are four types of teachers: (i) O-class teachers hired by NGOs like IRC; (ii) catch up⁸ teachers supported by NGOs like NRC; (iii) elementary teachers assigned by ARRA with financial support from UNHCR; and (iv) high school teachers employed by EOC-DICAC-RRAD. These teachers are composed of national and refugee incentive staffs with different salary scales as presented in Table 3 below:

Table 3: National Refugee Teachers Salary Start-up by Specialization

⁸ Catch-up teachers are those who teach refugee students before they are admitted to the regular class. When refugee students first arrive, ARRA together with concern stakeholders like WEO identify the grade level of the student through test. Before provision of the test, the students are given the catch-up class in one class lower (i.e., if the student is a 5th grade, in catch- up class he/she is given 4th grade five courses (English, Maths, Biology, Physics, & Chemistry) as a catch-up for three months before she/he took the test. When the students pass these courses, they will be allowed to join the grade level they claim they are.

No.	Category of Teachers	Nationality	Specialization	Start-up Salary ⁹
1	O-Class Teachers	Incentive teachers	No	900
2	Catch-up Teachers	National	Diploma and Degree	2,404 – Diploma salary 3,137 – Degree salary
3	Elementary School Teachers	National and Incentive teachers ¹⁰	Diploma and Degree	Degree salary- 4,900 plus 50% provident fund plus 40% Hardship Diploma salary – 3,700 plus 50% provident fund plus 40% Hardship
4	Secondary School Teachers	National	Degree	5,040 plus 50% provident fund plus 40% Hardship

National teachers hired by ARRA, besides better salary, have access to residence rooms within ARRA camps and have transportation services. These teachers are concerned with decrease of their salary scale as a result of the GEQIP-E AF's harmonization and integration goal of refugee education with the national system that transfer refugee teachers into the national payroll. Besides, salary concern, the staffs are also worried about losing their additional services packages they have been getting from ARRA. They further noted that the government teachers are given with 140 meter squares of residence land in Woreda and zonal towns where they are serving, but refugee teachers are not eligible. Their reward is the better salary and benefits which they fear they will lose. They noted, if they lose the incentive schemes and salary, they will leave their job and join the national schools, particularly urban schools.

Refugee teachers are concerned with no change in their salary despite the change in their academic status. They noted that there are graduates in diploma and degree in the Ethiopian education system but no change in their payment was made. They are equally paid with refugee incentive teachers who do not have any certificate and grade 10 and 12 completes.

Interviewed refugee teachers indicate that they are involved in distribution of ration for refugees every month for five days. As a result, they have been closing the school and class periods for these five days. This has become one factor contributing to lack of interest for education among the refugee students. Interviewed teachers in Berahle refugee camp (Afar) noted that refugee students prefer to attend host community schools because the students believe that quality education in local community schools is better than the refugee schools. In Afar and Gambella, host community students do not went to attend refugee schools. For instance, in primary schools of Berahle Camp, host community informants noted their children do not want to attend refugee schools due to fear of labeling by host community as 'refugee student'. Those who attend refugee schools do not want to be identified as a student in refugee schools. But the case in Gambella was different and is associated with ethnic tension and fear of conflict between the students.

Regarding the AF program, interviewed and consulted teachers indicated that the program to achieve its goal of improved quality education should not only target provision of textbooks, school grants, purchase of stationary materials, and renovation of classrooms. They emphasized that given the large

⁹ The start-up salary is for national teachers, not for refugee incentive teachers

¹⁰ For incentive teachers, it is based on agreement.

classroom-student ratio and the poor quality of host community schools, the program should be involved in new classrooms construction and expansion. The assessment team also observed not only classrooms shortage but also poor standard classes both in refugee and host communities' schools where the classroom-students ratio was falling between 80 and 120. In addition, some refugee classrooms are constructed with iron sheets for temporary use. The assessment team observed that host community primary school students attending their class in temporary shades made of grass in Shire camps, kebele meeting halls in Sherkole, and under the tree sitting on stones and on floors in Itang woreda of Gambella without desks and chairs to use, that necessitates not only renovation, but also expansion or construction of new classrooms.

Even though it varies from region to region, the participation and involvement of refugees in the management and administration of refugee schools is found weak. Unlike host community schools, the role of refugee school parent-teacher associations (PTAs) in supporting teaching-learning is limited and the PTAs role is only bringing back dropout students to schools. There is no labor contribution for the schools as well as the involvement of refugee PTAs in school environment improve activities is meager.

The refugee students also noted some challenges and concern they have been facing. They indicated lack of solar light to study and bags to handle and carry their exercise and textbooks. Refugee students do not have rechargeable solar to study at night, and hence they study only during day time. This, according to student informants, has impacted their performance and cause increased refugee students' dropout and failure. In addition, in some areas like Bambasi, students travel a long distance to attend preparatory school carrying their exercise and textbook on hand without bags to keep safe and secure. On average, preparatory school refugee students in some camps travel more than one hour (80 – 120 minutes) a day (back and forth).

REBs and WEOs informants indicated, in the past, there had been sport competition between refugee and host community students organized and supported by ARRA and other development partners. According to informants, sport has largely contributed in creating good host and refugee communities' integration and social cohesion as well as students of the two parties. However, sporting was not sustained due to budget shortage.

Lack of Technical Education and Vocational Training (TEVT) centers for refugee students is an issue raised by refugee students and refugee community members. Informants indicated absence of TVET centers for refugee students who do not score a result to join preparatory and university students after completing grade 10 and 12. As a result, students sit idle with their parents at home, which risks them to be engaged in use of different addictive substances like chewing *Khat*, smoking cigarettes, and other substance abuses. This issue has been raised in all refugee camps. Recently, there had been attempts by different NGOs in some refugee camps to construct and run TVET centers like in visited camps of Jewi and Hitsats. But most refugee camps, like Assosa and Jijiga camps, lack vocational training centers and informants demand TVETs to protect their children from addiction and substance use, predominantly girls from unwanted marriages for economic reasons.

REBs, WEOs and host community informants requested to extend the AF activities to those Woredas found close to the refugee hosting Woreda. According to informants, the impact of refugees is not restricted to Woredas where refugee camps are located rather the impact is experienced and felt in other nearby Woredas too. Effect of refugee on nearby Woredas and communities is also reiterated by all consulted government officials and host communities in the visited refugee hosting regions and they suggested AF program's support to reach other Woredas neighboring refugee camps as well.

For instance, the REB head in Afar indicated due to Afar culture, most refugees are not living in the camps. They usually move out-of-camps to see their relatives seeking for social support and reside with

them out of the camps. Hence, informants noted that the AF should target not only host community schools in refugee hosting Woredas but also other potential refugee impacted areas like Dalol, Afedara, etc. Among the Afar and Somali, according to informants, living in camps is a last resort; and the informants indicated that *“being in camp is assumed as being without relative.”* In addition, informants stated, more than 4,000 refugees live outside refugee camps with their close relatives unregistered and unrecognized as refugees.

The findings show that the relationship among refugee and host community students as well as the interaction of refugee and host communities varies from camp to camp, even in the same region. For instance, refugee students in Shimelba, Bamabis, and Gambella camps are not treated well and there is some discriminatory behavior from the host communities based on ethnic difference. The refugees in Shimelba camps are from ethnic Kunama, whereas the host community members are dominantly from Tigray ethnic group. Similarly, in Sherkole refugee camp, there are different refugee ethnic groups mainly the Sudanese, South Sudanese, Congolese, Rwandans, and Cameroonians. Their number is quite different and more than 90% are Sudanese refugees, followed by South Sudanese and Congolese. There are also Nuer ethnic groups in the newly established Bure Shimbola Camp in Benishangul-Gumuz.

Generally, weak host and refugee community interaction prevails in Gambella and some camps like Tongo in Benishangul-Gumuz regions. And in some instances, hostile relationships exist between refugee and host community in these areas (see Section 5.2.1 for detail discussion).

4.2 Other Key issues Raised during Stakeholders Consultation having implication on AF Program

There are key issues that are raised by consultation participants that will have direct and indirect impact on the proposed AF implementation. These include:

4.2.1 Stringent ARRA rules and regulations to access refugee camp schools

REBs and WEOs indicated that working with ARRA will be difficult due to existing ARRA stringent rules and regulation to access schools in refugee camps that they have been experiencing in the BSRP. They noted the existing rules and regulation do not support the involvement of WEOs, particularly regarding the administration of refugee education by the WEO. In the absence of legal support, informants indicated, it becomes a challenge to accept and implement the AF program.

As indicated above through UNICEF BSRP, REBs and WEOs in the five refugee hosting regions have started working with ARRA to support refugee schools. The REBs and WEOs are supporting the refugee schools through capacity building trainings as well as inspection and supervision of refugee schools. Additionally, school grant was budgeted for refugee schools in the BSRP where ARRA schools are required to prepare school improvement plans (SIP) to strengthening and capacitating teachers and utilize the money. However, every REB informants noted that ARRA is not willing to prepare SIP to utilize the allocated budget. ARRA required to directly transferring the SIP budget into its account, instead of preparing the plan to utilize it. According to informants, every year unutilized school grant budget allocated for refugee schools has been returned to UNICEF. REBs are not able to transfer the budget into ARRA’s account as no guideline supports direct cash transfer to ARRA’s account. Thus, informants expressed, in AF the mandate and responsibility of MoE and ARRA should be clearly pinpointed regarding budget management and utilization to avoid any delay of activity implementation. Therefore, regional and Woreda informants stressed that unless a memorandum of understanding (MoU) is signed to freely access refugee schools, the implementation of the proposed PforR program will be delayed. The school grant proposed in the AF (DLI9) will also be integrated with the UNICEF program of it would continue to support ARRA schools to avoid duplication of resources.

On the other hand, ARRA strongly believes that the REBs and WEO have capacity limitation. ARRA zonal coordinators noted that REBs and WEOs lack the necessary experience and human resources to effectively administer and manage refugee schools.

4.2.2 Shortage of Classrooms, textbooks, and Qualified Teachers including Offices

In both refugee and host community schools, there is shortage of classrooms, particularly, as discussed above, host community students attend class in shades made of grass and without desks. The challenge they face is not just the quality of the classrooms, rather usually the grass is taken by wind, dust blows over the student, and teaching-learning is interrupted during rainy season. Schools' environments were also found unattractive particularly the landscape is not properly designed and most schools lack green area for vegetation.

In most host community primary schools, though the number varies from region to region, on average about 50 students attend in a class, which is almost twofold of the national standard (50 students in one class at primary level and 45 students per school in secondary). However, in most refugee schools, according to school directors, about 120 students attend in one classroom. For instance, in Assosa refugee camps, the classroom-student ratio was estimated to be 102 to 120. In Gambella refugee camps, classroom-student ratio was reported to be between 95 – 120 students. Whereas, in host community schools relatively the classroom-student ration is good. The main challenge in the host community schools is the poor classrooms standard where the students learn under the tree and inside shades without desks. The student-classroom ration is calculated taking under tree students as students attending in one classroom.

The assessment team observed that host community primary school students attending their education in temporary shades made of grass in Shire camps, kebele meeting halls in Benishangul-Gumuz, and under the tree and on the walls in Gambella without desks and chairs which makes not only renovation, but also expansion classes, or construction of new schools a necessity. Almost all host community schools lack drinking water and there is poor hygienic conditions. School toilets are unclean.

Both refugee and host community schools have shortage of textbooks. Especially, in refugee schools, the student-textbook ratio, on average, is 1 to 4. The refugees' schools sometime receive textbook support from WEOs, given the Woredas have surplus textbooks. The refugees school directors in Shire camps indicate that the type of textbooks they obtain are not alike. Sometime, they get a textbooks published by Addis Ababa education bureau; and at a times textbooks published by Benishangul-Gumuz Education Bureau.

In addition, refugee curriculum had been changing frequently. However, currently all refugee schools are using the national curriculum. Following the national curriculum, first cycle primary students are thought in their mother-tongue. However, there is shortage of teachers trained in and textbooks prepared for some refugee ethnic groups like the Kunama and Nuer.

The REB and WEO heads indicated shortage of some textbooks in host community schools. For instance, there are shortage of Mathematics, English, and Mother-tongue textbooks in some visited refugee hosting regions of Benishangul-Gumuz and Gambella. In these regions, students are thought in their mother-tongue from grade 1-4; and as a subject in second cycle primary schools. In these regions, there is shortage of textbooks in first cycle primary schools prepared in their local language.

In most refugee and host community schools, teachers do not have well established offices. Many primary and secondary refugee camps' teachers lack offices which discourage to regularly go to the

schools. As a result, teachers went to schools only when they have a class to teach. Besides, those schools having offices for teachers lack chair and tables. The teachers sit a turn-by-turn bases. In addition, those schools having teachers' offices are without ICT and internet facilities to update themselves with latest reference materials and teaching aids available online.

4.2.3 Lack of Sport Fields and Facilities

In all refugee hosting regions, refugee and host community schools have poor sport fields and playground like football, volleyball, and basketball fields. Some schools, even though they have sport fields, the fields are not properly prepared and operational. Again, some schools have the space for sport games but not well prepared and managed. Besides, almost all schools lack sport facilities like balls, sport uniforms, nets, rackets, etc.

Most schools' physical environment in refugee and host community areas has ragged topography and their physical environment is difficult for sport games. This is because, according to informants, the areas recently selected for school compound and construction are those which are inconvenient for farming and crop production. This could lead to hug cost for site clearing while preparing sport fields.

4.2.4 Shortage and Lack of Pedagogy Centers, Laboratories, and libraries

Most refugee and host community schools lack pedagogy centers, libraries, and laboratories. Those schools which have pedagogy centers also face shortage of the necessary materials required like shelves, tables, and properly ventilated rooms. The laboratory rooms are also not to the standard and chemicals are not properly placed. Laboratories for different subjects like physics, chemistry and biology are not separated and there are no safety measures in place. At times, due to shortage of teachers, graduates in other fields like sport teachers, etc. are teaching physics, chemistry or biology courses and they use laboratories to demonstrate for students which have a high impact and danger on both teachers and students.

Most refugee and host community schools have library rooms. But the libraries lack shelves, latest reference books, and space for reading. The libraries have limited space and the seating arrangements for students, casing highly congested, suffocated, unventilated, and unattractive libraries. Given refugee and host communities schools are located in hot environment, libraries and classrooms require ventilation so that students will attend schools and use libraries and laboratories un-suffocated and freely without stress. There are schools which totally do not have libraries. For instance, in Jewi refugee primary schools, only one primary school (Primary School No.1), out of four refugee primary schools has library. The remaining three schools do not have library.

5. Assessment of Existing Environmental and Social Impacts in Refugee Areas: Magnitude and Scale

5.1 Environmental Impacts

5.1.1 Deforestation and grazing land impacts

Most refugee camps are situated in remote parts of the country where electric power connection or other alternative sources of energy is mostly unavailable. It is reported during the consultations that Refugees hosted in all the five regions widely use forest wood for supplying their domestic energy for cooking (fuel wood) and to build their homes. Moreover, the refugees in Gambella and Benishangul areas also use grasses for making roofs to their homes. Some refugees in Tigray and Afar regions also possess cattle, goat as well as camels and widely depend on grazing for their herds.

There is a wide view and agreement between the host communities and many stakeholders that the use of fuel wood, timber and roofing grass by refugees for various purposes has caused considerable adverse impact on the forest resources in the hosting areas. The level of deforestation impacts varies but in those regions where such natural resources were already meager (e.g. Tigray, Afar & Somali regions) the complaint by host communities and other stakeholders is high. Competition and illegal exploitation of pasture and grazing lands by refugees is also another adverse impact affecting the host communities. As a result such impacts of the refugees on the natural resources have often become a source of tension and potential conflict between the host and refugee communities.

In the effort to avert the deforestation impact of refugees, ARRA is working on reforestation and alternative energy programs with its Implementing Partners (IPs) which are NRDEPP, SEE, OSD and GAYA association. However, the scale of deforestation impact is believed to be disproportional with the reforestation activities carried on. Besides the provision of alternative energy sources to the refugees which usually include distribution of kerosene, ethanol stoves, briquette charcoals, solar lanterns etc. are scarce, inconsistent and small.

5.1.2 Land degradation and wildlife hunting

Refugees in some camps use mud briquettes for building their homes. Digging of holes in uncontrolled and haphazard way to exploit soil for making mud briquettes has caused adverse impacts of land degradation. In addition, some refugee groups hunt certain types of small animals for eating which is allowed in their cultures. According to discussions held with host community members, hunting of small animals is affecting not only the wildlife but also some of terracing structures made by the community for soil and water conservation purpose.

5.1.3 Environmental sanitation and solid waste management problems

In the refugee camps, toilets are availed to be used by the refugee themselves. However, in some refugee camp areas such as Shimelba and Hitsas, there are practices of open defecation outside the camps which are reported to have caused a general adverse impact on the environmental sanitation of the areas. Host communities in the area appear to have been affected by the deteriorated environmental sanitation. Moreover, in other refugee camp areas such as Awubare, littering of solid waste especially plastics are affecting the environmental sanitation of the area including school compounds.

5.1.4 Lack of School fences and environmental sanitation

It was noted during the ESSA field assessment that absence of proper fence around the school compounds has caused adverse environmental sanitation impacts in and around the schools. For example, host community schools in Itang (Gambela) and Kebribeyah (Somali) having no fence were exposed to urination and defecation in and around classrooms which was severely affecting the school environment and health of the school community.

5.1.5 Impacts of inadequate water supply and sanitation facilities in schools

Many host community and refugee camp primary and secondary schools are observed to have inadequate or no water supply for drinking and washing hands. The shortage of water supply combined with shortage or in some cases absence of toilet facilities in the schools have the impact of adversely affecting the school environmental sanitation. Such impacts are observed to be particularly severe in those schools found in the low land hot weather areas. Students attending classes in these schools are exposed not only to high school drop outs but also health impacts.

5.1.6 Impact of inadequate ventilation in overcrowded classes

In the large majority of the community and refugee camp primary and secondary schools, it was observed that the number of student per class is very high ranging from 80-120. In the hot weather lowland refugee and host community schools (e.g. in Gambella), these oversized large classes are affected by lack of adequate ventilation support which causes suffocation and indoor air pollution. The indoor air pollution/suffocation has an impact on the students and often exacerbates school drop outs.

5.2 Social Impacts of Displacement

5.2.1 Ethnic Tension and Conflict

Reviewed literature indicates prevalence of tension and conflict in and around refugee communities in Gambella and some camps in Benishangul-Gumuz. The rapid growth of refugee communities, and in some areas, enrollment of significant numbers of refugees in already crowded national schools, has led to tensions between refugee and host communities in some areas, including violent confrontations in Gambella region (World Bank, 2017). In response to this, ARRA and other partners like UNHCR, UNDP and UNWOMEN are implementing a project to improve community security, protection and access to justice in four districts and seven camps, in particular building capacities of local institutions. Initial UNHCR seed funding has led to the commencement of some activities including the mapping of legal aid service providers, initiating practice sharing on mobile justice by rule of law experts from Melkadida; developed guidelines for mobile justice in Gambella; preparation of a Baseline Safety and Security and Access to Justice Services Perception Survey; and supporting community policing, peace building and community safety activities with the aim to empower both communities to jointly cooperate, detect, report criminal and violent activities (UNHCR, 2018).

ESSA findings also concur with the literature. There are reported cases of ethnic based tensions in Gambella that will deter refugee and host community students to attend classes together. In Gambella, informants indicated the existence of tension and conflict among the Nuer and the Anuak ethnic groups. Informants worried that this tension and conflict will be manifested in schools if they are going to attend same classes together. As a result, refugee and host community integration is accepted with fear and suspicion given a big security concern as the majority of refugees are from Nuer ethnic groups hosted in Anuak dominated areas. Even though consultation participants welcomed the program, they are afraid of the likely occurrence of conflict between refugee and host communities including students.

Consultation participants noted that if two host and refugee students fight/quarrel due to personal reasons, it will be changed to inter-ethnic tension and conflict. Here is how refugee school director explained it:

If two students from different ethnic groups (Anuak and Nuer) quarrel, for instance, on a pen, the incident immediately will be changed to ethnic conflict. Then, it will cause ethnic violence which will claim lives. Hence, schools will be closed and bring the situation into normal would take one or two months.

Furthermore, host community informants noted: “let alone with us, the refugees are in conflict within themselves”. There are reported cases of conflict among the Nuer refugees within based on sub-clan difference. For instance, there are conflicts between *Gajak* and *Gajok* clans of the Nuer.

As discussed above, in Gambella, there is an attempt by UNICEF and World Vision to help refugee and host community students’ integration constructing building for high school in Jewi, Gog, Itang, and Dima areas. ARRA, UNICEF, and World Vision have consulted on and discussed with host community to send their students to join refugee high schools with an intention to promote refugee and host community integration. However, in visited Jawi refugee camp high school (grade 9-10), host and refugee students do not attend together as the host communities are not willing to join with the refugee students. Informants indicated that host community students are not willing to appear to Jewi refugee high

school. The reasons forwarded are: (i) cultural and language difference between the refugee (Nuer) and the host (Anuak) ethnic groups; and (ii) fear of conflict among host community and their children as refugees are not from the same ethnic group with them. This is because, according to the refugee informants, the Anuak ethnic groups perceive refugee Nuers and host community Nuers alike and the want to avoid any threat of conflict.

Consulted Anuak ethnic groups, who are host communities, noted that they need schools to be constructed in their village, rather than in the refugee camps. Their children will not, and do not want to go to the refugee camps to attend class with refugee children. They indicated it would have been better if the high school would be constructed in host community villages as they will welcome refugee children to attend their education with their children as they are their guests.

The assessment finding shows, to date, there are no conflicts between the host and refugee community members that would have claimed human life. However, there were past conflicts between the Nuer refugee and Anuak host community youths on loading and unloading work in Jewi camp. Host community informants noted that initially host community youths established an association and performed the loading and unloading activity in Jewi refugee camp. Later on, the refugee youths had pushed them out and took over the task. As a result, the refugee and host community communities have been in tension for long; and the host communities have vengeance against the refugees.

Generally, ESSA findings show that relation between refugee and host community and their students was not robust. There is a weak interaction between the two and in some areas like Gambella and some camps in Benishangul-Gumuz regions, hostile relationships prevail. In some woredas of Gambella, Afar, Benishangul-Gumuz and Somali, refugee population outweighs the host community, which is also true of refugee students. This weak and fragile relation will be escalated to conflict and tension by the proposed AF unless carefully managed and peaceful coexistence activities are proposed. Before integration started, informants proposed to hold intensive discussions, consultations, and awareness raising meetings with the different segments of refugee and host community populations like the elders, women, decision makers, and responsible stake holders like regional, Woreda, and ARRA security, justice, and police. The program should also work on peaceful coexistence and social integration like sport.

To address social and emotional challenges faced by refugee children because of conflict and displacement, and to reduce tensions between refugee and host communities, a DLR is set in the AF that could support the commissioning of activities to build socio-emotional strength among school age refugee children, and social cohesion in refugee communities and between these and host communities. The DLR would reward the commissioning of small-scale contracts with experienced local NGOs and community organizations in the primary refugee-hosting regions to deliver activities to foster interaction between refugees and host communities to overcome mistrust and build social cohesion.

5.2.2 Sexual and Gender-Based Violence (SGBV) Incidents

Literature shows forced displacement increases the risk of sexual and gender based violence (SGBV), especially intimate partner violence. In some humanitarian settings, sexual violence—by both partners and non-partners—is also exacerbated. Girls’ mobility is often restricted, and rates of child marriage may increase. Women and girls can experience violence at every stage of their journeys, including at camps, transit countries, when they reach their destinations, and when they return home to a war-ravaged setting (GEQIP-E AF Draft PAD).

Field based assessment result reveals SGBV is prevalent among refugee girls and women in camps. The incident is high particularly before refugees cross the border to Ethiopia. For such cases, no one is

accounted for and is beyond ARRA mandate to prosecute the perpetrators. However, school¹¹ based SGBV and refugee camps seem rare (not more than two cases a year). There were no figures showing the magnitude of SGBV in refugee schools. In addition, school based SGBV data are not found at the REBs and WEOs as well as at host community schools. The findings show that the current SGBV Prevention Programmes by NGOs are based on components of increasing the awareness within the community, as well as using community structures for different outreach activities. In addition, there are (i) women and girl empowerment programmes, including literacy and numeracy programmes; (ii) supporting women and girls to participate in decision making process through community based protection structures. UNHCR with partners developed a National Action Plan to mainstream SGBV prevention and response across the sectors of Child Protection, Education, Shelter, Health and Nutrition and Energy to address risks in multi-sectorial approach. However, the REBs and WEOs did not allocated budget for gender related activities to properly address school based SGBV in an organized manner.

In some camps like Shire, refugee boys deceive host and refugee girls with false promises to marry and take them abroad (third countries). Informants indicated that girls being cheated by the fake promises made by refugee boys, they got pregnant, and dropped their schooling. There are many cases of unwanted pregnancy and abortion among the refugee and host community girls, particularly in and around Shire camps. Deception and cheating of girls by refugee boys with a false promise is a serious concern raised by host and refugee communities.

Even though SGBV reporting at schools is rare, global and federal data literature shows that not all SGBV cases are reported by survivors as due to fear of discrimination and ostracization from the community. Given global and federal data (e.g. on domestic violence noted in the ET DHS), it can be expected that a vulnerable group like female refugees are exposed to that risk. Besides, the presence of a structured referral system itself shows the seriousness of the cases.

There are also practices that violate girls' rights to education like: (i) early marriage; (ii) female genital mutilation (FGM); (iii) harmful traditional practices; and (iv) sexual harassment. Literature shows these five practices violate girls' right for education. There is early marriage among the host and refugee communities. Early marriage is culturally supported and prevalent among Afar, Somali, Nuer and Anuak ethnic groups in Gambella, Berta in Benishangul-Gumuz, Sudanese and South Sudanese refugees in Assosa camps, and Kunama ethnic groups in Shimelba Camp. IRC reveals one in five girls experienced early marriage, or were cohabiting with a male as if married.

Marriage of girls at early age, usually between ages 13-15, resulted in girls' high drop-out rate and significant decrease in the number of girls in high schools. Informants explained that girls after they completed primary education, they get married and give birth. Thus, the number of girl students in secondary schools is much lower than boys due to early marriage. Once girls get married, they are unable to continue their education and drop from schooling because of pregnancy and shouldering family responsibility.

In refugee and host communities, girls early age was mostly pressure from their parents and community members. Girls' absenteeism in refugee schools is a common phenomenon particularly in Gambella and Shire refugee camps due to early engagement, responsibility for family care, and domestic chores. The main reason why parents force girls to marry at an early age was economic reasons (poverty) and low awareness of community on girls' education. Parents to overcome their economic changes, they need girls to marry at early age and get better bride prices. In addition, the pastoralist refugees, particularly the Afar, have low awareness on education. Pastoralists have low value for education because of,

¹¹ School refers both refugee and host community schools

according to informants, lack of role model women who completed their education and attained a good status in their community.

Generally, SGBV is a concern in all refugee camps overall rather than refugee schools specifically. Consultation participants reported that there are cases where women in the refugee camps were raped and harassed during night. For instance, the data obtained from Afar camps show 27 GBV reported cases; of which 21 female and 6 male.

FGM is practiced mainly among the Kunama, Afar and Somali refugees. Literature shows that FGM has both short and long-term consequences, mainly health effects including recurrent urinary and vaginal infections, chronic pain, infertility, and difficult labor, that all have adverse impact on girls' education. It has also its psychological impact and an abnormality in the female sexual function when married.

School girls also suffer from sexual harassment. Both refugee and host community girl students are harassed on their way to schools and going back to home. Informants reported that girl students have been harassed, mainly outside of school compound. Though rare, rape cases and sexual violence are evident on girl students who travel long distance to reach schools. As a result, SGBV in refugee and host communities are given due considerations in all refugee hosting regions. In refugee camps, there are different organizations working on SGBV. For example, IRC is working in Shire, Assosa, and Jijiga camps; African Humanitarian Action (AHA) in Berahle and Aysaita camps; RaDO in Jijiga and Melkadida camps; and International Medical Corps (IMC) in Gambella camps. These NGOs have been working on three areas to address SGBV: (i) prevention, (ii) response, and (iii) coordination to minimize and alleviate SGBV in refugee camps. Prevention activities are intended to tackle or deter SGBV occurrence. There are incentive as well as volunteer community workers undertaking the prevention activities. The different activities of prevention include awareness raising or outreach activities to the community, RCC, ARRA staffs, elders, and other stakeholders through trainings and using billboards and distribution of leaflets, brochures, etc. Community structures like RCCs, Women Associations, girls clubs and others work on voluntary basis and without any incentive mechanisms.

The response component of SGBV includes individual case management, provision of material support, and referral to physical protection, when available, to legal services, and medical and psychosocial support services to survivors. There is a well-established and functional SGBV referral pathway in all refugee camps and host communities. When SGBV cases are identified or reported by survivors, there is a response mechanism in place protecting the privacy and right of survivors. There are well trained and capacitated women response officers (incentive social workers) assigned by NGOs in all refugee camps. Survivor centered approach response arrangements are sought and girls' friendly centers were also established. There are safe centers (also named as wellness centers) where SGBV survivors report and get support. In safe centers, there are indoor and outdoor games; playing grounds; skill trainings like handcrafts, hair work, sewing; etc. Safe centers are also locations where SGBV survivors get psychological first aid treatment, protection, and psychosocial counseling, social support, and feel relaxed. Survivors are treated with utmost care keeping their confidentiality, privacy and identity. According to informants, since safe centers are locations where girls prefer to play and chat with their fellow friends at normal circumstance, the survivors like any other girls could visit safe centers and report their cases in a confidential manner.

A survivor, as convenient to her/him, reports either to the social workers (incentives under response team), community workers (incentives under prevention team), the RCC members, or ARRA/UNHCR protection officers as they find proper and safe to them. Recipients keeping confidentiality refer the

case to social workers for psychosocial support; and as required, to other concerned specialists like ARRA protection officers for legal support or Health workers for medical support. The main role of response officers is receiving new cases and follow-up, old reported and newly referred cases. Before referral is made, the survivor is asked for his/her consents, fill-in a form and get countersigned. Unless consent is obtained from the survivors, SGBV cases will not be referred because of confidentiality issues. After cases are referred, utmost efforts are exerted to keep confidentiality of information.

However, host community schools lack safe centers for girls. Host community girls face shortage of sanitary pads. There are no NGOs supporting sanitary materials in host community schools. Schools need to have safe room/wellness center for girls equipped with sanitary materials and water so that girls will use rest during their menstruation time, wash their bodies and access sanitary materials.

Depending on the scale of impact, SGBV survivors are resettled to third countries conducting children Best Interest Determination (BID) in some refugee camps. As discussed above, usually, SGBV cases are reported to social workers, or RCCs, or ARRA staffs. For instance, in Berahle camp after they received SGBV cases the responsible NGO, Zonal ARRA (protection and Gender officer), and UNICEF, tries to identify the magnitude of the problem and depending on the impact, the team facilitates access to required services and treatment for the victim including facilitating urgent resettlement in third countries after conducting Best Interest Assessment (BIA) of the survivor. If the case is serious and there is a need to get legal support they refer the case to police and justice office and follow-up the process. All support for the survivors was provided on a case-by-case basis only. Referral to third countries for durable solution is also sought. In Berahle camp since 2018, there are 40 children for which BIA is conducted; of which five (5) children BID were made; and they are resettled in third countries seeking for durable solution.

In most refugee camp schools, IRC have Girls Empowerment Project funded by UNICEF which aims to raise the voice of girls and protect SGBV. Doing so, the project enhances the confidence of girls in their future life and allows open and free discussion on reproductive health through awareness creation using mini-medias. The project has established 'Safe School Committee' comprised of students, teachers, community elders, and religious leaders. The committee works on reducing girls' drop-out. Anti-harassment code of conduct was developed and refugee teachers were made to sign the code of conduct every year. Other activities of the project include: provision of sanitary pads for girls, awarding outstanding girl students, prevention of early marriage, and support school girls' clubs. School girls' clubs have the responsibility to follow up and report SGBV cases in school.

In host community schools, UNICEF has been working for prevention of SGBV through MoE. There is gender department under MoE that structurally goes down to regional level. The gender department in collaboration with the regional gender specialists conduct awareness raising trainings to education experts, teachers, and students on school based SGBV. However, informants indicated that high level regional decision-makers have limited SGBV knowledge that caused giving low attention and consideration.

To protect and minimize school based SGBV, there are girls' clubs established in refugee and host community schools. NGOs working on SGBV in refugee camps also supporting refugee school clubs both materials and provision of trainings. Girls' clubs undertake awareness creation for the students on SGBV. However, host community girls club have minimal support and in some schools lack any support. The girls' clubs play a significant role in awareness raising and receiving cases of violence or harassment in schools supported by women teachers, and then procedurally report to the concerned bodies and facilitate medical and legal support if required for survivors.

Few regions like Benishangul-Gumuz have free telephone contact numbers to report SGBV cases to the responsible government bodies like Women and Youth Bureau, Police Department, etc. and request support. At regional and Woreda levels, there is a committee established composed of Women and Youth Bureau/, Police Department, Justice Bureau, Health Bureau, and other concerned stakeholders to address and give immediate response for SGBV cases. The committee members have a strong linkage, coordination, and active work relationship. The committees have a time table for meetings that varies from region to region but usually it is monthly.

In some refugee hosting regions, in regional hospitals (Assosa, Jijiga and Gambella hospitals), there is one-stop-center, a separate safe centers for the treatment of SGBV survivors, established by sector bureaus to provide service for the refugee and host communities composed of legal expert, health and nutrition specialist, and psychosocial specialist. Informants indicated that there is strong coordination among the case management team members.

Men and women host community discussants noted that SGBV was not a concern in their villages due to strong culture condemnation of the act through socialization. Instead, what are prevalent from host community side are physical exploitation and abuses cases of their wives. The physical exploitation and abuse include acts like wife beating at home that may cause physical injury and/or bone fracture, intimidation, use of derogative terms (insulting) that demoralize wives, etc. When such cases are recounted, the responsible Woreda offices, identify the cases, and refer it to legal authorities. In some refugee hosting regions, there are also NGOs working to minimize SGBV among the host communities. For instance, IRC have an Adolescent Girls Empowerment project in Benishangul-Gumuz and the project targets life skill trainings to create a brighter future and confidence of women in some Woredas like Homosha and Bambasi Woredas of Benishangul-Gumuz. Due to shortage of budget, only 100 adolescent girls are targeted.

5.3 Psychosocial Impact of Displacement on Refugees

The psychosocial and emotional impacts of displacement are large and have significant impacts on the capacities of refugee communities to learn and progress. Literature show that refugees face huge psychological and emotional trauma as the result of displacement, loss of property and livelihoods, and destruction of social capital through disruption of communities and networks (World Bank, 2017).

ESSA finding also shows refugees have psychosocial problem like stress, trauma, depression, anxiety, and feeling of loneliness due to loss of property and relatives, livelihoods, and destruction of social capital, which is particularly prevalent in newly arrived refugees and the children. The impact is highly observed on unaccompanied children, especially on girls. Understanding the psychosocial problems of refugees, in all refugee camps, there are child friendly spaces and women and girls centers where psychosocial support has been provided by NGOs. For instance, International Medical Corps (IMC) in Gambella camps, AHA in Semera camps, NRC and IRC in Shire camps, IRC in Assosa, and RaDO in Jijiga camps. The psychosocial support is given in all streams program activities like nutrition, SGBV, community sexual reproduction and health and HIV prevention.

There are incentive social workers in all refugee camps who provide psychosocial support hired by the NGOs and ARRA. For instance, the social workers are assigned to support unaccompanied and separated children, particularly to look after, taking care, and follow-up them. Every single day, the social workers check and follow-up school attendance of the unaccompanied children.

Recently, due to the continuous awareness raising activities to the refugee community and capacity development trainings for ARRA staffs on how to provide psychosocial support mainly based on WHO guideline, better psychosocial support has been provided in all refugee camps. There are psychosocial support centers in refugee camps (one per camp), which is not enough given the large number of

refugee population, according to informants. For instance, IMC have a structure to provide psychosocial support. It has one program manager, two psychosocial support specialists, and psychosocial center facilitators at camp levels. In Gambella refugee camps, IMC identified more than 700 individuals (most of them are less than 18 years children) who need mental health psychosocial counseling. The majority of those who have psychosocial problem and receiving the psychosocial support are girls. Informants noted that those who recovered have been demanding livelihood support, which their organization is not able to provide because of budget shortage.

Besides sports and play activities set in the proposed AF, there is a need for additional activities to build social cohesion and provide integrated social services for both refugee and host community children through the AF program. These include capacity development trainings and top-ups for incentive social workers to strengthen their support to unaccompanied children; and provision of sanitary pads for girls.

5.4 Vulnerable Groups

There are different types of vulnerable groups in the host and refugee communities which require special attention in GEQIP-E AF.

5.4.1 Special Need Children

There are large number of children with special needs in the refugee and host community. Comparatively, the special need children in host communities have some access to schooling than those in the refugee camps as there are cluster special need teachers and, though limited, provision of some education materials and supplies. Most refugees' special need students do not attend schools. Many refugee schools are not accessible to special need students as their physical environment is not good and relatively poor; roads are not designed to be accessible, except ramps; and there are lack of special need teachers and teaching aids.

There are no statistics that show the exact number of special needs children in the refugee community attending schools. However, in the visited refugee camps, a total of 18,887¹² special need people (children and other adults with disabilities) were reported; of whom 10,193 are male and the remaining 8,697 are female (see Table 4 below). School directors indicate that they are going to collect register and collect the number of special needs students by type of disability, age and sex to share with WEO for EMIS.

Table 4: Persons with Special Need (children plus adults) in refugee camps

No.	Name of Camps	Persons with Special Need		Total
		Male	Female	
1	Assosa	1916	993	2,909
2	Shire	437	118	555
3	Semera	217	176	393
4	Gambella	4,787	4,821	9,608
5	Jijiga	845	1,010	1,855
6	Dolo Ado	1,991	1,576	3,567
	Total	10,193	8,697	18,887

Source: Compiled by ARRA, 2019

¹² UNHCR noted that this number also encompasses unaccompanied and separated children

During the fieldwork, even though not the data is not disaggregated data into in-school and out-of-school special need children, an aggregate data showing the number of special need children (school age children) in the visited camps is acquired and summarized in the Table 5 below:

Table 5: Children with Special Need (school age children) in visited children

No.	Name of Camps	Male	Female	Total
1	Assosa	1,916	993	2,909
2	Shire	79	45	124
3	Semera	217	176	393
4	Gambella	166	121	287
5	Jijiga	766	705	1,471
	Total	3,144	2,040	5,060

In spite of the presence of large number of special need children, special needs education in visited refugee camps was not given due emphasis. In addition, the school environment is poor and inconvenient for special need children particularly those visually impaired, hearing difficulty, and mental disability. In almost all visited refugee schools, those with physical disability are mainly attending schools. There are some challenges, indicated by informants, like lack of brail, problem of sign languages, and lack of teachers to support them.

Except the construction of ramps and few supports by some NGOs for those with mobility difficulties and awareness raising activities, special need children are not getting the necessary support in both host and refugee communities. The types of support provided by NGOs for children with physical disability include wheelchairs and movement support materials. For instance, in Gambella and Jijiga refugee camps RaDO is constructing ramps in schools, providing wheelchair support for those who have movement difficulty, and creating awareness raising for the refugee community and teachers. Similarly, in Berahle refugee camp, Mekan Eyesus is providing same support. Other categories of special need children are not attending their education in the refugee schools. There is no provision of brails, sign language aids and teaching materials, improving the school environment for wheel chair movement, children with sight problem, etc.

5.4.2 Unaccompanied and Separated Children

Literature shows the growing population of unaccompanied and separated children leaving with family members in the country of origin, other locations within the country of asylum or third countries, particularly from Eritrea. Among the refugees in Shire Camps, children constitute 49%; and among the total number of children, 16.6% are unaccompanied and separated children.

Data acquired during field visits confirm this fact. During the field visit there are vulnerable unaccompanied children aged between 10 – 14 years reported who left their parents back at home. Their number varies from camp to another, but the largest number is found in Shire camps; which are 3,368 (see Table 6 hereunder).

Table 6: Unaccompanied and separated Children

No	Camps	Sex		Total
		Male	Female	
1	Assosa	716	248	964
2	Shire	2104	1258	3,368
3	Semera	30	6	36
4	Gambella	-	-	_ ^{13*}
5	Jijiga	340	1,275	1,615
	Total	3,190	2,787	5,987

In Shire camps like Shire, unaccompanied children, who live in community care (a form of semi-institutional care) are supplied with meals; have employed refugee caregivers or social workers who support and provide guidance and counseling; and special attention for the refugee camps. However, informants indicated these kids have behavioral problems and abstain from class. Many use addictive substances like smoking cigarette, chewing *Khat*, and use of alcohol. Teacher informants indicated that the unaccompanied children do not have an interest for education more than any other students, particularly the girls. The reasons are: (i) expecting family reunification in third countries, (ii) self-care and absence of someone taking care of them, and (iii) family yearning and need to return home.

5.4.3 Ethnic Minority Refugees

There are ethnic minorities in the refugee camps. In Shire refugee camps, the ethnic minorities are the Kunama who migrated from Eritrea. In the past, they are thought with the Eritrean Curriculum. Following, the national curriculum, refugee students in all camps are thought using the national curriculum. As a result, the refugees primary school in Shire camps are thought using Tigray region curriculum where the students are thought of Tigreña mother-tongue.

However, Kunama ethnic groups are not learning their mother-tongue as there is lack of mother-tongue textbooks prepared in Latin alphabet and specified teachers in this alphabet. This is because the Ethiopian Kunama uses the Sabina (Geez) alphabet, but Eritrea Kunama alphabet use Latin. The qualified national Kunama teachers do know the Latin alphabet that posed a challenge to Eritrea Kunama education. As a result, they have shortage of textbooks prepared in Latin alphabet and teachers for teaching children of Eritrea Kunama in their mother-tongue.

Similarly, in Assosa refugee camps, there are South Sudanese, Congolese, Rwandans, and Cameroonians refugees who are counted as ethnic minorities. In Assosa camps, the Benishangul-Gumuz region curriculum is used; and as most of the refugees are from Sudanese and host communities are Berta ethnic group who speak and use Arabic language as a medium of instruction in primary school, the children of these ethnic groups attend their primary education with the medium of instruction being Arabic and English.

To address the rights of ethnic minorities to attend their education with their mother-tongue, a feasibility assessment need to be conducted by education professionals and experts and suggest the way forward.

¹³ *Data was not available on unaccompanied children, but there are many unaccompanied children found in Gambella camps.

5.4.4 Girls and Women

Girls and women are among the vulnerable groups in refugee camps. Gender disparities in refugee education are large and persistent. There are seven female refugee students enrolled for every ten males, and only 15 percent of refugee girls complete primary school, versus 39 percent of boys (and 52 percent of girls in the general population). The gross enrolment ratio (GER) in upper secondary (grades 11-12) for refugee girls was just two percent in 2016/17.

Field based assessment result shows a number of factors contributing to girls and women vulnerability by affecting girls education and increase in their dropout. Even if school based SGBV are reported as rare, there are practices that violate girls' rights to education and increased their dropout like: (i) early marriage; (ii) female genital mutilation (FGM); and (iii) sexual harassment. Literature shows these three practices are violence against girls' right for education. Early marriage is culturally supported and prevalent among refugees and host communities of Afar, Somalis, Nuer and Anuak ethnic groups in Gambella, Berta in Benishangul-Gumuz, Sudanese and South Sudanese refugees in Assosa camp, and Kunama ethnic groups in Shire Camps.

School girls also suffer sexual harassment. The girl students are harassed on the way to schools and going back to home on both refugee and host community students. Though rare, rape cases and sexual violence are evident on girl students who travel long distance to access schools.

Girls' early marriage and sexual harassment is targeted in the proposed AF. A package of life skills and empowerment classes, informed by and adapted from the IRC intervention and piloted in additional regions (besides Benishangul-Gumuz), is another potential area of support for the IPF.

6. Relevant and Applicable International and Ethiopia's Environmental and Social Management Systems

6.1 National Environmental and Social Impact Assessment and Management

This section provides an overview of the policy and legal framework and a profile of the various key institutions and their role with respect to the management of environmental and social aspects. OP/BP 9.00 requires that all *P for R* operations function within an adequate legal and regulatory framework to guide environmental and social impact assessment and management. In order to assess the adequacy of Ethiopia's legal and regulatory framework, applicable laws and institutions for environmental and social management are described in this section, along with the roles and responsibilities of institutions involved.

6.1.1 Applicable Policies and Strategies forming the National Environmental and Social Management System

This section discusses relevant national and regional environmental Policies, strategies and legislations applicable to GEQIPE AF that needs to be considered during program implementation phases. The discussion below provides a list of the key relevant environment legislations and key institutions that are in charge of the implementation. The relevance of these requirements to GEQIPE AF is assessed with due consideration of the requirements and guidelines of OP/BP 9.00.

The Constitution

The constitution of the Federal Democratic Republic of Ethiopia had been issued in August 1995 with several provisions, which provides basic and comprehensive principles and guidelines for environmental protection and management in the country. The concept of sustainable development and environmental rights are presented in Articles 43, 44 and 92 of the Constitution.

Article 43- The Right to Development

- The Peoples of Ethiopia as a whole, and each Nation, Nationality and People in Ethiopia in particular have the right to improved living standards and to sustainable development.
- Nationals have the right to participate in national development and, in particular, to be consulted with respect to policies and projects affecting their community.

Article 44- Environmental Rights

- All persons have the right to a clean and healthy environment.
- All persons who have been displaced or whose livelihoods have been adversely affected as a result of State programs have the right to commensurate monetary or alternative means of compensation, including relocation with adequate State assistance.

Article 92- Environmental Objectives

- Government shall endeavor to ensure that all Ethiopians live in a clean and healthy environment.
- The design and implementation of programs and projects of development shall not damage or destroy the environment.
- People have the right to full consultation and to the expression of views in the planning and implementations of environmental policies and projects that affect them directly.
- Government and citizens shall have the duty to protect the environment.

Article 42: Rights of Labor

Article 42(2) stipulates that ‘workers have the right to a healthy and safe work environment’, obliging an employer (be it government or private) to take all necessary measures to ensure that workplace are safe, healthy and free of any danger to the wellbeing of workers.

Environment Policy of Ethiopia

The first comprehensive statement of Environmental Policy of Ethiopia was approved by the Council of Ministers in April 1997 that was based on the policy and strategic findings and recommendations of the Conservation Strategy of Ethiopia. The policy is aimed at guiding sustainable social and economic development of the country through the conservation and sustainable utilization of the natural, man-made and cultural resources and the environment at large. The overall policy goal is to improve and enhance the health and quality of life of all Ethiopians and to promote sustainable social and economic development through the sound management and use of natural, human-made and cultural resources and the environment as a whole so as to meet the needs of the present generation without compromising the ability of future generations to meet their own needs. The Environmental Policy provides a number of guiding principles that require adherence to the general principles of sustainable development. In particular, the need to ensure that Environmental Impact Assessment:

- Considers impacts on human and natural environments
- Provides for early consideration of environmental impacts in project and program design
- Recognizes public consultation processes as essential to effective management
- Includes mitigation and contingency plans

- Provides for auditing and monitoring
- Is a legally binding requirement

The Government of Ethiopia has recently initiated to update the Environmental policy of Ethiopia. The technical committee under the Ministry of Environment, Forest and Climate Change was formalized to be in charge of updating the National environmental policy to fulfill and gaps identified in addressing climate change and other environmental issues.

FDRE National Occupational Safety and Health Policy and Strategy

The National Policy and strategy on Occupational Safety and Health (OSH) was endorsed by the FDRE Council of Ministers in July, 2014. The OSH policy and strategy was prepared to implement the rights of Labor as stipulated in article 42(2) of the Constitution and also implement the requirements of International Conventions on Occupational Health and Safety (No.155) to which Ethiopia is a signatory. The overall objective of the national OSH Policy and strategy is to avoid, prevent or minimize occupational and health hazards by providing effective OSH services in all working places and thereby contribute to the socioeconomic development of the Country.

The guiding principles of the National OSH policy and strategy are stated as the following:

- Occupational Safety and Health Services are basic rights of workers
- Occupational Safety and Health Services are necessary in all working places
- Occupational accidents and health hazards can be prevented
- Tripartite and bipartite cooperation and coordination are key instruments for the national OSH policy and strategy implementation.

The Specific objectives of the National OSH policy and strategy include:

- To ensure availability and accessibility of OSH services in all economic activities including in the informal work sectors
- To prevent occupational safety and health hazards by establishing a tripartite and bipartite consultation and coordination mechanisms
- To establish OSH systems that pays attention to those workers who seek special assistance (e.g: Women, youth, persons with disabilities, HIV patients, e.t.c).
- To prevent the environment, public and workers health by preventing the release of pollutants from the work places.

The strategy of the national OSH policy includes;

- Establishment of an effective and accessible work conditions inspection mechanism that is focused on prevention.
- Formulating and implementing national regulations and standards on OSH and updating and improving it periodically.
- Integrating and implementing OSH protection principles in all national development plans
- Establishing control and inspection mechanism that ensure prevention of occupational and health hazards to workers and impacts on the environment from occurring due to import. use or disposal of machineries, raw materials or chemicals in work places.
- Establishing a mechanism to ensure OSH services are provided in the private sector
- Establishing a mechanism to ensure provision of advices and technical support on OSH are provided by Organizations.

The national OSH policy and strategy is applicable to all types of work places and economic activities in Ethiopia.

6.1.2 Applicable Proclamations, Regulations and Procedural Guidelines forming the National Environmental Management System

Environmental Impact Assessment Proclamation (Proclamation No. 299/2002)

The EIA Proclamation is used to predict and manage the environmental effects of a proposed development activity as a result of its design, siting, construction, operation, or an ongoing one as a result of its modification or termination, entails and thus helps to bring about intended development.

The proclamation is an effective means of harmonizing and integrating environmental, economic, cultural and social considerations in to the planning and decision making processes thereby promoting sustainable development. Moreover, it serves as a basic instrument in bringing about administrative transparency and accountability, to involve the public and the communities in particular, in the planning and execution of development programs that may affect them and their environment. The objective of undertaking the assessment study is to ensure the impacts of a development project and the incorporation of mitigating measures for the adverse significant impacts. The EIA law and associated guidelines clearly defines:

- Why there is a need to prepare EIAs
- What procedure is to be followed in order to implement EIA
- The depth of environmental impact studies
- Which projects require full EIA studies
- Which projects need partial or no EIA studies
- To whom the report must be submitted

There are ongoing efforts carried by the former MoEFCC (now Environment, Forest, and Climate Change Commission) to review the EIA Proclamation in order to update and improve it.

Environmental Pollution Control Proclamation (Proclamation No. 300/2002)

This proclamation is aimed at eliminating or, when not possible, to mitigate pollution as an undesirable consequence of social and economic development activities. It has also an objective of protecting the environment and safeguarding of human health, as well as maintaining of the biota and the aesthetic value of the environment. The Proclamation, among others has considered control of pollution; management of hazardous waste, chemical and radioactive substances; management of municipal wastes; the importance and need to respect environmental standards; and punitive and incentive measures.

Solid Waste Proclamation (Proclamation 513/2007)

Solid Waste Management proclamation aims to promote community participation to prevent adverse impacts and enhance benefits resulting from solid waste management. It provides for preparation of solid waste management action plans by urban local governments.

Proclamation to Provide for the Establishment of Environmental Protection Organs (Proclamation No. 295/2002)

The first objective of this proclamation is to assign responsibilities to separate organizations for environmental development and management activities on the one hand, and environmental protection,

regulations and monitoring on the other, which is instrumental for the sustainable use of environmental resources. The second objective is to establish a system that fosters coordinated but differentiated responsibilities among environmental protection agencies at federal and regional levels.

Water Resources Management Proclamation (197/2000)

The purpose of the Proclamation is to ensure that the water resources of the country are protected and utilized for the highest social and economic benefits of the people of Ethiopia, to follow up and supervise that they are duly conserved, ensure that harmful effects of water are prevented, and that the management of water resources is carried out properly.

Environmental Impact Assessment Procedural Guidelines Series (Series 1 and 2)

In order to facilitate the implementation of Environmental Impact Assessment Proclamation (Proclamation 299/2002), the then MoEFCC had formulated four procedural guidelines, namely, Review Guideline Series 1: Guidelines for Review Approach; Review Guideline Series 2- Guidelines for Contents and Scopes of Report; Review Guideline Series 3- Checklist of Environmental Characteristics and Review Guideline Series 4- Review Criteria. These widely applied draft environmental impact assessment guidelines were under review to enhance the documents in light of the experiences gained so far and to publish it for official use after endorsement by the Ministry. The review process is still ongoing and yet to be completed during the current 2018/2019 fiscal year. Review Guideline Series 1 and 2 will be elaborated to a certain extent here and any further updates made to the documents will apply after official publication of the reviewed guidelines.

A) Procedural Guideline Series 1 -Guidelines for Review Approach

This guideline pointed out roles and responsibilities of the former MoEFCC (now called EFCCC) and Regional Environmental Agencies, the proponent, consulting firm, interested and affected parties, and the licensing agency. In the guideline, the EIA processes and requirements, and comprehensive description of the EA process has been stated. It also outlined projects which may have adverse and significant environmental impacts, and may, therefore, require full EIA (Schedule 1), projects whose type, scale or other relevant characteristics have the potential to cause some significant environmental impacts but not likely to warrant an environmental impact study (Schedule 2) and projects which would have no impact and does not require environmental impact assessment (Schedule 3).

B) Procedural Guideline Series 2 - Guidelines for Contents and Scopes of Report

This guideline among others indicates structure and content of the Environmental Impact Study Report and describes the contents including the administrative, legal and policy requirements, assessment and mitigation measures. The guideline indicates the following main types of mitigating measures, which need due considerations:

- Preventing, reducing or minimizing impacts before they occur;
- Eliminating an actual impact over time by incorporating appropriate maintenance measures during the life of the project;
- Rectifying an impact by repairing, rehabilitating or restoring the affected environment;
- Compensating for an impact by replacing or providing substitute resources or environments as well as contingency plans in case of emergencies;
- Maximizing beneficial impacts through specific additional actions

c) Directive No.2/2014 (2006 EC): Directive on issuing “professional competence certificate to consultants and firms providing service in Environmental Impact Assessment, Environmental Audit and Climate Change fields”

The Directive has been issued by the MoEFCC (now called EFCCC) and has been in force for the last four years. It has become an important milestone in the development of the EIA system in Ethiopia. The directive stipulates that EIA and Environment Audits should be conducted by professional consultants and firms that are registered and certified for their competence by the Federal Environment, Forest, and Climate Change Commission. EIAs and Environment Audits prepared by unregistered and certified firms will not be eligible for review and approval. The Regional EPFCCs have also started applying the stated directive of MoEFCC. Directive no.2/2014 is also among the guidelines put under review by the MOEFCC and is being updated.

d) Environmental guideline and management plan

- **Guideline for Environmental Management Plan (draft), May 2004** outlines measures for preparation of an Environmental Management Plans (EMP) for proposed developments in Ethiopia and institutional arrangements for implementation of EMPs.

- **EIA Procedural Guideline (draft), November 2003:** This guideline outlines the screening, review and approval process for development projects in Ethiopia and defines the criteria for undertaking an EIA.

- **EIA Guideline, July 2000:** The EIA Guideline Document provides essential information covering the following elements:

- Environmental Assessment and Management in Ethiopia
- Environmental Impact Assessment Process
- Standards and Guidelines
- Issues for sector environmental impact assessment in Ethiopia covering agriculture, industry, transport, mining, dams and reservoirs, tanneries, textiles, hydropower generation, irrigation projects and resettlement
- The guideline contains annexes that:
 - Identify activities requiring a full EIA, partial measure or no action
 - Contain sample forms for application
 - Provide standards and guidelines for water and air

Waste Handling and Disposal Guideline, 1997

The Waste Handling and Disposal Guidelines have been in use since 1997. The Guidelines are meant to help industry and local authorities handle medical waste situation at the local level.

6.1.3 Proclamations on public and workers safety

The Labor law

Ethiopia has issued proclamations in the effort to improve employment relations and outcomes, protect child labor exploitation, and maintain proper occupational health and safety. The transitional government of Ethiopia has issued Labor Proclamation No. 42/1993. This proclamation was amended and replaced with Labor Proclamation No. 377/2003. The Labor Proclamations have had detailed provisions pertaining to workers’ suspension and protects their rights. Besides, there are other labor related proclamations such as the provisions of the Employment Exchange Service Proclamation (Proclamation No. 632/2009) and the Right to Employment of Persons with Disability (Proclamation No. 568/2008) enacted to govern the relations between employers and employees.

The Labor Law protects Children against Child Labor abuse. Under the provisions of the Revised Family Code (2000), a child or minor is defined as “a person of either sex who has not attained the full age of eighteen years”. Proclamation No. 377/2003, Article 89 prohibited employment of less than 14 years. The proclamation states “It is prohibited to employ persons under 14 years of age”. It is also prohibited to employ young workers which on account of its nature or due to the condition in which it is carried out, endangers the life or health of the young workers performing it. "Young worker" means a person who has attained the age of 14 but is not over the age of 18 years (Article 89 Sub-Article 3).

Proclamation 377/2003, is also the prevailing law protecting public and workers safety. The proclamation covers health and safety at work, harmonious industrial relation and minimum workplace standard and addresses workplace vulnerability. Article 92-93 of the proclamation defines obligation of employers and employees in work place including assignment of safety officers and health committee.

The Labor Proclamation mandates employers to protect occupational safety, health and create better working environment for their workers. Article 92 states that “An employer shall take the necessary measure to safeguard adequately the health and safety of the workers...” The proclamations have details about the safety and health of workers. For instance, it forces employers to i) take appropriate steps to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations and the precautions necessary to avoid accident and injury to health; ii) ensure that directives are given and also assign safety officer; establish an occupational, safety and health committee of which the committee's establishment, shall be determined by a directive issued by the Minister; iii) provide workers with protective equipment, clothing and other materials and instruct them of its use; etc.

In addition to enacting its labour codes, Ethiopia is also a signatory to the international UN conventions and has ratified the major international human rights instruments. Ethiopia has also ratified the following ILO conventions:

- Forced Labour Convention No.29 /1930;
- Freedom of Association and Protection of the Right to Organize Convention, No.87/1948;
- Employment Service Convention, No.88/1948;
- Right to Organize and Collective Bargaining Convention, No.98/1949;
- Abolition of Forced Labour Convention, No.105/1957;
- Minimum Age Convention No. 138 /1973;
- Occupational Safety and Health Convention, No.156/1981;
- Termination of Employment Convention, No.158/1982;
- The Rights of the Child Convention (1989); and
- The Worst Forms of Child Labour Convention No.182/1999.

The 2005 Occupational Health and Safety Directive: developed as a follow-up to the labor Proclamation provides guidance on the establishment of occupational health and safety committees in public and private organizations.

Building Proclamation

Building Proclamation no.624/2009 and regulation no. 243/2011 serves to protect the safety of the public and workers in the construction sector. Article 31 and 36 state the precautionary measures to be taken during construction and necessary facilities required by persons with disabilities in public buildings. Detail implementing direction is issued on directive 5/2011 by the (former) Ministry of Urban Development and Construction. Note should be made that there is no law in the country to regulate the standard and quality of infrastructure constructed.

Ministry of Construction (then part of Ministry of Urban Development, Housing and Construction) and Ministry of Labor and Social Affairs signed a memorandum of understanding (2012) to implement the proclamation 624/2009 in an integrated manner to prevent an onsite accident and ensure accessibility for person with disability.

Table 7: MoEFCC Guidelines and Standards

GUIDELINE / STANDARD	DESCRIPTION
EIA Procedural Guideline, November 2003	<p>The EIA guideline of 2000 mentioned above was revised in 2003 and issued as draft EIA procedural guideline. The later outlines the screening; review and approval process for development projects in Ethiopia and defines the criteria for undertaking an EIA.</p> <p>Annex-III identifies the schedule of activities for which a full EIA, partial EIA or no action is required. The schedule of activities listed in Annex-III is widely applied by the Federal and Regional competent authorities to classify sub-projects into one of the three Categories.</p>
Directive No.2/2014 (2006 EC): Directive on issuing “professional competence certificate to consultants and firms providing service in Environmental Impact Assessment, Environmental Audit and Climate Change fields”	<p>The Directive has been issued by the MoEFCC and brought into force in the last four years. It has become an important milestone in the development of the EIA system in Ethiopia. The directive stipulates that EIA and Environment Audits should be conducted by professional consultants and firms that are registered and certified for their competence by the Ministry of Environment. EIAs and Environment Audits prepared by unregistered and certified firms will not be eligible for review and approval. The Regional EPFCCs have also started applying the stated directive of MoEFCC and others preparing their own version of the Directive (e.g. Amhara region)</p>
Draft Guideline for Environmental Management Plan (draft), May 2004	<p>The guideline provides guidance on the necessary elements for preparation of an Environmental Management Plan (EMP) for proposed development projects in Ethiopia and the institutional arrangements for implementation of EMPs.</p>
ESMSG of GEQIP-E	<p>These guidelines which were developed to support P for R operation of the current GEQIP-E have since been used by the Ministry of Education. The ESMSG defines the procedures for screening of sub-projects against environment and social risks; identification of the required level of due diligence; mitigation and monitoring measures to address key risks related to school grant investments.</p>
The Labor Proclamation 377/2005	<p>The Labor proclamation requires an employer to take the necessary measures to adequately safeguard the health and safety of the workers. It also consists of provisions that address working conditions of women and young workers (14-18 years age). The Federal Labor law is the basic legislation directly applied by all the regional states without further making regional version of it.</p>
Building Proclamation 624/2009 & regulation 243/2011	<ul style="list-style-type: none"> • The Building proclamation stipulate the minimum national standard for the construction of buildings in order to ensure public health and safety and allows for inspection of construction site during working hours to check, among others, the presence of facilities to cater to physically impaired persons.

6.2 Applicable Social Management Policies, Regulations, and Guidelines for Social Management

6.2.1 The Constitution

The Ethiopian Constitution recognizes the presence of different socio-cultural groups, including historically disadvantaged and underserved communities, pastoralists, agro-pastoralists, and ethnic minorities, as well as their rights to socioeconomic equity and justice.

Article 39 of the Ethiopian Constitution recognizes the rights of groups identified as “Nations, Nationalities and Peoples”. They are defined as “a group of people who have or share a large measure of common culture or similar customs, mutual intelligibility of language, belief in a common or related identities, a common psychological make-up, and who inhabit an identifiable, predominantly contiguous territory.” The Constitution depicts the rights of these Nations, Nationalities and Peoples to: self-determination, including the right to secession; speak, write and develop their own languages; express, develop and promote their cultures; preserve their history; and, self-government, which includes the right to establish institutions of government in the territory that they inhabit and equitable representation in regional states and federal governments.

The Constitution also recognizes another group called “national minorities”. Article 54 (1) states that: “Members of the House [of Peoples Representatives], on the basis of population and special representation of minority Nationalities and Peoples, shall not exceed 550; of these, minority Nationalities and Peoples shall have at least 20 seats.” These groups have less than 100,000 members and most live in the ‘Developing Regional States’.

6.2.2 National Policies for Equitable Access to Education

Constitutional provisions, policies and programs in Ethiopia foster the creation of an inclusive environment for equitable access to quality education, from which regions that are lagging behind and disadvantaged social groups can equally benefit. The Right to ‘Education For All’ is enshrined in the Constitution which provides for a range of fundamental rights including: the right to equal and effective protection without discrimination (Article 25); special attention to the rights of Women guaranteeing affirmative action to address inequality and discrimination (Article 35); and equal rights of nations and nationalities, people within the Ethiopian state (Article 39).

The principles of state policy in relation to education are outlined under Article 90, which states: “To the extent the country’s resources permit, all Ethiopians are guaranteed access to education in a manner that is free from any religious influence, political partisanship or cultural prejudices.” The rights of children are also constitutionally protected (Article 36) against harassment and violence in schools and other institutions responsible for the care of children. In addition, Article 39 (the Rights of Nations, Nationalities), and article 41 (Economic, Social and Cultural Rights) protect the rights of ethnic groups within Ethiopia in terms of their use of mother tongue, and the protection of culture and identity, and equal representation in regional states and the federal government.

As a signatory state of the African Charter of Human Rights, Ethiopia has committed itself to protecting the rights of all peoples to social, cultural and economic development of their choice in conformity with their identity (Articles 20 and 21). Provision is made under Article 41(5) for the conditions of equal

opportunities and full participation of people with disabilities. Ethiopia is also a signatory state to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979), the Convention on the Rights of the Child (CRC, 1990) and the Convention on the Rights of People with Disabilities (CRPD, 2006).

6.2.3 Ethiopia's Education Sector Development Program (ESDP)

The ESDP is a twenty-year education sector indicative plan that translates the 1994 Education and Training Policy (ETP) into action through a long and medium term planning cycles. It is a sector wide approach that encompasses all the education and training programs of Ethiopia - spanning from pre-primary education to tertiary education. It relies on a consultative process of setting targets, its scope and priorities for action. It calls for a sustained public investment program through mobilization of national and international resources.

Ensuring equitable access to quality primary education for all children by 2015 is the main aim of ESDP, with particular attention to the education of girls, and the children of pastoralist and agro-pastoralist communities. ESDP was commenced in 1997/98. The ESDP V (2015/16 – 2019/20) constitutes the Government program on which the proposed PforR Program is based. ESDP V identifies six priority programs from which the goals for ESDP V derive: capacity development for improved management; general education quality; general education access, equity and internal efficiency; adult and non-formal education; Technical and Vocational Education and Training; and higher education (refer GEQIP-E ESSA for detail discussion on pillars of ESDP V; page 5-8).

6.2.4 Conventions and Declarations on Refugees

6.2.4.1 Refugee Conventions and Protocols

Ethiopia is a signatory to a number of international and regional human rights conventions (UNHCR, 2010). The country has accepted and is a party to the Convention Relating to the Status of Refugees done at Geneva on 28 July 1951, the Protocol Relating to the Status of Refugees of 31 January 1967 and the OAU Convention Governing the Specific Aspects of Refugee Problem in Africa, done at Addis Ababa on 10 September 1969.

The 1948 Universal Declaration of human rights in Article 14 recognizes the right of persons to seek asylum from persecution in other countries. In 1951, the UN adopted a Convention relating to the Status of Refugees and international refugee protection. The 1967 Protocol removed the geographic and temporal limits of the 1951 Convention and thus gave the Convention a universal coverage. The convention indicated the general Obligations of Refugees as; "Every refugee has duties to the country in which he finds himself, which require in particular that he conform to its laws and regulations as well as to measures taken for the maintenance of public order" (Article 2).

The Convention noted rights of refugees to access courts Contracting States. It states "A refugee shall have free access to the courts of law on the territory of all Contracting States" and they "shall enjoy in the Contracting State in which he has his habitual residence the same treatment as a national in matters pertaining to access to the Courts, including legal assistance and exemption from *cautio judicatum solvi*" (Article 14).

The Convention has declaration regarding gainful employment such as wage-earning employment and self-employment under Article 17 and 18. Article 17 (wage-earning employment): "The Contracting State shall accord to refugees lawfully staying in their territory the most favorable treatment accorded to nationals of a foreign country in the same circumstances, as regards the right to engage in wage-earning employment." Further explaining under Paragraph 2 of the same Article states: In any case, restrictive

measures imposed on aliens or the employment of aliens for the protection of the national labor market shall not be applied to a refugee who was already exempt from them at the date of entry into force of this Convention for the Contracting State concerned, or who fulfills one of the following conditions:

- (a) He has completed three years' residence in the country;
- (b) He has a spouse possessing the nationality of the country of residence. A refugee may not invoke the benefits of this provision if he has abandoned his spouse;
- (c) He has one or more children possessing the nationality of the country of residence.

Article 18 also talks about self-employment rights of refugees. "The Contracting States shall accord to a refugee lawfully in their territory chapter iii: Gainful Employment treatment as favorable as possible and, in any event, not less favorable than that accorded to aliens generally in the same circumstances, as regards the right to engage on his own account in agriculture, industry, handicrafts and commerce and to establish commercial and industrial companies.

As per the Convention, refugees have also the right to public education. The Convention states: "the Contracting States shall accord to refugees the same treatment as is accorded to nationals with respect to elementary education" (Article 22).

OUA, currently called AU, has promulgated the 1969 Convention Governing the Specific Aspects of Refugee Problems in Africa noting with concern the constantly increasing numbers of refugees in Africa and desirous of finding ways and means of alleviating their misery and suffering as well as providing them with a better life and future.

6.2.4.2 Refugee Proclamation of Ethiopia

Ethiopia has enacted the national legislation for the effective implementation of the aforesaid international legal instruments, establish a legislative and management framework for the reception of refugees, ensure their protection, and promote durable solutions whenever condition permit. Hence, the country has promulgated Refugee Proclamation No. 409/2004. The Refugee Proclamation No. 409/2004 outlines Ethiopia's legal framework for refugees and respects key protection principles. The refugee Proclamation stipulates the treatment of refugees with no-discrimination as to race, religion, nationality, membership of a particular social group, or political opinion.

Currently, in January 17, 2019, the FDRE House of Representative has approved a new refugee proclamation that will replace Refugee Proclamation No. 409/2004. Regarding Access to Education, the endorsed Proclamation, under Article 23 plainly indicated the rights of refugees in Ethiopia as follows:

Every recognized refugee or asylum-seeker shall receive the same treatment as accorded to Ethiopian nationals with respect to access to pre-primary and primary education (Article 23, sub-article 1).

Every recognized refugee and asylum-seeker may have access to secondary education; higher education; technical and vocation education and training; and adult and non-formal education within available resources and subject to the education policy of Ethiopia (Article 23, sub-article 2).

Recognized refugees and asylum-seekers may receive the most favorable treatment as accorded to foreign nationals in respect to education other than primary education, in particular, as regards access to studies, the recognition of foreign school certificates, diplomas and degrees, the remission of fees and charges and the award of scholarships (Article 23, sub-article 3).

6.2.5 Refugee Education Strategies, Declarations and Frameworks

National Refugee Education Strategy (NRES)

UNHCR launched a Global Education Strategy (GES) in 2012 focusing its rollout in thirteen priority countries. Ethiopia was one of the operations selected to rollout a country-specific adaptation of the GES in 2012. As part of the efforts towards implementation of the GES, while the global rollout of GES was ongoing, UNHCR Ethiopia contextualized the GES to the Ethiopia-specific context developing a National Refugee Education Strategy for five years (2015-2018). The key purpose of NRES is to adapt and contextualize the global strategy to the Ethiopian context so as to facilitate the implementation of the six objectives and four strategic approaches identified in the GES. Therefore, the purpose of the Ethiopia Refugee Education Strategy is, firstly, to increase shared-vision among all stakeholders regarding refugee education programming by identifying and prioritizing needs, actions and approaches. The second purpose of the contextualized strategy is to help enable UNHCR and education partners to use the strategy as an advocacy tool in resource mobilization and allocation of funds to meet prioritized education needs. The third purpose of the contextualized education strategy is to support UNHCR and education partners to effectively evaluate and monitor education programs.

This Strategy is designed to provide overarching guidance on refugee education in Ethiopia and overall goal of improving refugee access to high quality education. The NRES aims to support the mainstreaming of refugee schools into the national education system, through harmonization of teacher training and management, learning assessment, and information management. The National Comprehensive Refugee Response Strategy, currently in draft, is expected to establish cross-sector frameworks for mainstreaming of refugee schools, health facilities, and other services within wider frameworks of national service provision.

The New York Declaration

The New York Declaration for Refugees and Migrants is a milestone for global solidarity and refugee protection at a time of unprecedented displacement across the world. Adopted by all 193 Member States of the United Nations in September 2016, it contains historic and wide-ranging commitments that reaffirm the commitment by Member States to respect the human rights of refugees and migrants and to support the countries that welcome them. The element of the New York Declaration for Refugees and Migrants is the commitments that apply to both refugees and migrants. The declaration states:

We¹⁴ will work to provide for basic health, education and psychosocial development and for the registration of all births on our territories. We are determined to ensure that all children are receiving education within a few months of arrival, and we will prioritize budgetary provision to facilitate this, including support for host countries as required. We will strive to provide refugee and migrant children with a nurturing environment for the full realization of their rights and capabilities (New York Declaration for Refugees and Migrants; 2016, Page: 7).

The Declaration also indicated the commitment to combating xenophobia, racism and discrimination against refugees and migrants. It noted that the refugee hosting countries will take measures to reduce the risks of marginalization and radicalization and improve refugees and migrants integration and inclusion, as appropriate, and with particular reference to access to education, health care, justice and language training. The Declaration further indicated the need to revise national policies develop to

¹⁴ Heads of State and Government and High Representatives, meeting at United Nations Headquarters in New York on 19 September 2016 to address the question of large movements of refugees and migrants

integration and inclusion, as appropriate, in conjunction with relevant civil society organizations, including faith-based organizations, the private sector, employers' and workers' organizations and other stakeholders. The refugees and migrants are also obliged to observe the laws and regulations of their host countries and behave accordingly.

The New York Declaration calls upon UNHCR to develop and initiate the application of the Comprehensive Refugee Response Framework (CRRF) in particular situations, in close coordination with relevant States, other UN agencies, refugees, NGOs and other stakeholders. The CRRF specifies key elements for a comprehensive response to large movement of refugees. These include (i) rapid and well-supported reception and admissions; (ii) support for immediate and on-going needs; (iii) assistance for local and national institutions and communities receiving refugees; and (iv) Durable solutions for refugees.

Following the New York Declaration, the day after (September 20, 2016), at the Leaders' Summit held in New York and co-hosted by Ethiopia, the Government of Ethiopia (GoE) made nine pledges (see Annex 1) to strengthen support to refugees. It released a formal 'Roadmap for the Implementation of the Ethiopian Government Pledges,' which lays out the preliminary details of implementation to shift from a 'care and maintenance' or camp-based model of refugee assistance to an approach which emphasizes on refugee self-reliance, refugee mobility in-country and the integration of refugees into regional and national development processes. This Roadmap is the key component to the GoE's ten year strategy which is under development, to comprehensively respond to the multifaceted needs of refugees through the creation of strong linkages between humanitarian assistance, development interventions and peace building initiatives, moving away from its reservations to the 1951 Refugee Convention and encampment practices (ReDSS, nd).

Djibouti Declaration

The Djibouti Declaration on regional conference on Refugee Education is made by IGAD member states with the motive to achieve regional quality education standards and inclusion into national systems for refugee children in line with the CRRF, SDG4 and Agenda 2063 on Education. The conference was attended by the ministers in charge of education in the IGAD member states convening in Djibouti on December 14, 2017 at the Regional Conference on Education for Refugees in IGAD member states.

The ministers agreed to: (i) take collective responsibility to ensure that every refugee, returnee and members of host have access to quality education in safe learning environment within their countries without discrimination; (ii) adopt and implement the accompanying action plan on education of refugees, returnees and members of host communities in the IGAD region; (iii) Establish an IGAD regional experts and Ministerial Committee of Education to oversee the proper implementation of all agreed standards, policy instruments and frameworks for education for all including refugees , returnees and members of host communities; iv) integrate refugees into the national education policies, strategies, programs and plans of actions in their respective countries.

The ministers also solely declare to take some key tasks¹⁵ on: (i) regional education quality standards, (ii) regional skill development for refugees, (iii) inclusion of refugee education into the national education systems, (iv) accreditation and certification of education programs, and (v) financing, partnerships, and monitoring in support of refugee education

Ethiopia, along with the other members of the IGAD, is also a signatory to the Djibouti Declaration on Refugee Education. The Djibouti Declaration on Refugee Education commits countries to: (i) integrate refugees into national education policies, strategies, programs and plans of action; (ii) strengthen EMIS

¹⁵ The details of tasks and activities are listed in the Djibouti Declaration.

data collection to include refugee schools; and (iii) more fully incorporate refugee teachers in national teacher management systems through accreditation, fast-track training and certification, and alignment of pay and conditions. The Government has committed to a long-term strategy of harmonizing and integrating refugee education into national education services and systems, as part of a wider vision to transition from a model reliant on refugee camps to one based around normalized settlements integrated with national and local services.

The Government has committed to harmonize delivery of services in camp schools with national systems of service delivery. In addition to CRRF, Ethiopia, along with the other members of the IGAD, is also a signatory to the Djibouti Declaration on Refugee Education.

6.2.6 National Comprehensive Refugee Response Strategy (NCRRS)

In February 2017, Ethiopia accepted to be considered as a CRRF focus country and became a CRRF ‘roll out country’ (UNHCR, 2018). The decision by Ethiopia to participate in the CRRF was quickly supported by a joint World Bank-UNHCR mission to consider support to refugee and host communities under the IDA-18 refugee sub-window.

The implementation plan for CRRF will be supported by a National Comprehensive Refugee Response Strategy (NCRRS) Ethiopia is drafted and approved this year on January 3, 2019. Ethiopia has launched the national CRRF on November 2017 “*Road Map for Pledge Implementation*”. In April and May 2018, regional launches were also held in the five regions hosting refugees, including Benishangul-Gumuz, Gambella, Tigray, Afar and Somali. The NCRRS was released for consultation and refinement in August 2018. The National Refugee Education Strategy (NRES) 2015-2018 aims to support the mainstreaming of refugee schools into the national education system, through harmonization of teacher training and management, learning assessment, and information management. The Government’s Roadmap for implementation of CRRF includes a commitment to include refugee camp schools in EMIS and regular National Learning Assessments.

Among the nine pledges by Ethiopia to strengthen support to refugees is the refugee education pledge. The pledge is intended “to increase enrolment of refugee children in preschool, primary, secondary and tertiary education, without discrimination and within available resources.” According to UNHCR (2018) report, the preliminary data on the school enrolment rate indicates significant progress in Ethiopia’s pledge to increase the number of students attending early, primary, secondary and tertiary education. As compared to the 2016/2017 academic year some 12,300 new students have been enrolled in preschools across the country while 40,000 more refugees have enrolled in primary and secondary schools (in camps and urban areas) during the current cycle with an additional 700 refugee youth pursuing university studies. As such, overall figures against the pledged numbers stand at:

- ECCE (pre-school) enrollment increase is 29% (from 42,276 to 54,619) – enrolment percentage stand at 57% (out of 60% pledged)
- Primary school increase is 37% (from 96,700 to 132,563) - enrolment percentage stand at 72% (out of the 75% pledged)
- Secondary school increase is 102% (from 3,785 to 7,665) -enrolment percentage stand at 12% (out of the 25% pledged)
- Tertiary education increase is 43% (from 1,600 to 2,300) - (out of the 2,500 pledged)

The Government’s Roadmap for implementation of CRRF includes a commitment to include refugee camp schools in EMIS and regular National Learning Assessments. Following CRRF launches in regions in April - May 2018, UNHCR has started working closely with World Bank, national and regional governments and other stakeholders to identify projects that may capitalize funding from Development

Response to Displacement Impact Program (DRDIP) and IDA-18 regional sub-window to benefit both refugees and host population. Funded by World Bank Ethiopia is benefiting from DRDIP to improve access to basic social services, expand economic opportunities, and enhance environmental management for host communities.

Additionally, in collaboration with World Bank and other development partners (European Investment Bank and the Ethiopian Investment Commission), UNHCR is working in creation of employment opportunities in industrial parks within Ethiopia under the project, Ethiopia Economic Opportunities Project (EEOP, the former Jobs Compact) to benefit both the host community and refugees. In June 2018, EEOP was approved by the World Bank Board of Directors.

6.2.7 Regulations on Persons with Disability and Vulnerable groups

Article 41 of the Constitution, (Economic, Social and Cultural Rights) states that every Ethiopian has the right to access publicly funded social services. Sub Article 5 of the same article stipulates, the state, within available means, should allocate resource to provide rehabilitation and assistance to physically and mentally disabled, the aged and to children who are left without parents or guardians.

Various policies and plan of action have been formulated to protect people with disability and the elderly. The most relevant are mentioned below;

- National Plan of Action of Persons with Disabilities (2012-2021) addresses the needs of persons with disabilities for comprehensive rehabilitation services, equal opportunities for education, skills training and work, as well as full participation in the life of their families, communities and the nation.
- Proclamation No. 568/2008, Rights to Employment for Persons with Disabilities, makes null and void any law, practice, custom, attitude and other discriminatory situations that limit equal opportunities for persons with disabilities. It also requires employers to provide appropriate environment for work, training and take affirmative measures particularly when employing women with disabilities.
- Building Proclamation, No. 624/2009 and Regulation 243/2011, puts as a requirement accessibility for the elderly and physically impaired persons in the design and construction of public building.

The National Social Protection Strategy of Ethiopia: Ethiopia has formulated National Social Protection policy in 2012 with a general objective to create an enabling environment in which citizens (including special need and other vulnerable segments) have equitable access to all social protection services that will enhance their growth, development. Ethiopia's social protection policy is a central public policy component for addressing poverty, vulnerability and inequality. The following are among the objectives of Social Protection Policy of Ethiopia:

1. Protect poor and vulnerable individuals, households, and communities from the adverse effects of shocks and destitution;
2. Increase access to equitable and quality health, education and social welfare services to build human capital thus breaking the intergenerational transmission of poverty;
3. Guarantee a minimum level of employment for the long term unemployed and under-employed;
4. Enhance the social status and progressively realize the social and economic rights of the excluded and marginalized;

The strategy has designed instruments to reach long and short term objectives including conditional and unconditional social transfer, expansion of public works; providing technical support and financial services; mandatory social insurance and community based health insurance; establishment of social work system, services for PWDs, the elderly and mobility constrained persons; enhancing abuse and exploitation prevention communication, provide protective legal and policy environment, support for survivors of abuse and exploitation and drop in centers and hot lines.

6.2.8 Regulations on Gender and Women Empowerment

The Constitution, (Article 43), provides a foundation for the recognition and protection of woman's rights and guarantee equal right with men. The constitution stipulates providing special attention to woman to remedy the historical legacy of inequality and discrimination Ethiopian women endured. Woman have the right to full consultation, the formulation of national development policies, the designing and execution of projects particularly those affecting the interests of women. Women's right to acquire, administer, control, use and transfer property; and rights to equality in employment, promotion, pay and transfer of pension entitlements are clearly stated in the constitution. The state shall enforce the right of women including to elimination of the influences of harmful customs and practices that oppress or cause bodily or mental harm to women.

The National Policy on Ethiopian Women (1993) underlines the need to establish equitable and gender sensitive public policies that empower woman, especially in education and property rights, and engaging them in decision making. Improving healthy working conditions, ensuring access to basic services, protecting woman from harmful traditional practices are among the emphasized key issues.

The Development and Change Package (2007) envisioning to build democratic society where women are equal participants and beneficiaries of economic, social and political life of the country. Widespread awareness creation of women to actively participate in the development process; organizing and associate women to address challenges they face; capacitate women to solve problems and fight demeaning perceptions & fight for their rights; facilitate linkages and support among created associations and organization; and enable women to benefit economically and socially.

Gender mainstreaming strategy and guideline (2010), to be adopted at policy, program and project level by government and development partners to ensure the out comes of development are shared equally between men and women; both men and women enjoy equal opportunities, status and recognition.

The ratification of the Family Law and amendements made to the criminal code significantly support to fight abuses committed against woman and children. Proclamation No, 377/2003 gives special attention to woman and young workers. The proclamation provides protection for woman in general and pregnant woman in particular from hard work and long hours. The law clearly states that women should not be discriminated against as regards to employment and payment on bases of her sex.

Gender norms in Ethiopia vary widely depending on geographic location, ethnicity, and religion, especially related to property ownership, inheritance, and the division of assets after divorce. However, the new Family Code has changed all that. Passed in 2000, it gives equal rights to women in marriage and it requires all assets be divided equally among both partners in the case of a divorce. By now, all the states in Ethiopia have approved this new Code. Ethiopia is one of many developing countries implementing gender policy reforms, especially regarding women's equal access to assets and resources.

7. World Bank PforR Core Principles and Analysis of Findings of Environmental and Social Management Systems against the Core Principles

7.1 World Bank PforR Core Principles

The Program for Results (PforR) Financing policy, Operational Policy/Bank Procedure (OP/BP) 9.00, requires the Bank to assess the arrangements, within a Program, for managing environmental and social effects in a manner consistent with Program for Results Financing objectives. This policy sets out core principles and key planning elements intended to ensure that PforR operations are designed and implemented in a manner that maximizes potential environmental and social benefits, while avoiding, minimizing, or otherwise mitigating environmental or social harm.

In terms of environmental and social management, PforR employs a risk management approach, in which process requirements are adapted to the Program context. For each proposed PforR operation, the Bank assesses—at the Program level—the borrower’s authority and organizational capacity to achieve environmental and social objectives against the range of environmental and social impacts that may be associated with the Program.

The core principles and key planning elements incorporated into OP/BP 9.00 establish the policy and planning elements generally necessary to achieve outcomes consistent with PforR objectives. These principles and elements are intended to guide assessment of existing borrower Program systems as well as their capacity to plan and implement effective measures for environmental and social risk management. They also serve as a basis for provision of Bank implementation support. The core principles and key planning elements are summarized as follows:

Core Principle 1: General Principle of Environmental and Social Assessment and Management

Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in Program design; (b) avoid, minimize or mitigate against adverse impacts; and (c) promote informed decision-making relating to a program’s environmental and social effects.

Key Planning Elements:

As relevant, the Program procedures do the following:

- Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level
- Incorporate recognized elements of environmental and social assessment good practice, including (a) early screening of potential effects; (b) consideration of strategic, technical, and site alternatives (including the “no action” alternative); (c) explicit assessment of potential induced, cumulative, and trans-boundary impacts; (d) identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized; (e) clear articulation of institutional responsibilities and resources to support implementation of plans; and (f) responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures.

Core Principle 2: Environmental Considerations – Natural Habitats and Physical Cultural Resources

Environmental and social management procedures and processes are designed to avoid, minimize and mitigate against adverse effects on natural habitats and physical cultural resources resulting from program.

Key Planning Elements:

As relevant, the Program to be supported:

- Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas
- Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities
- Takes into account potential adverse effects on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects.

Core Principle 3: Environmental Considerations – Public and Worker Safety

Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.

Key Planning Elements:

As required, the program to be supported has to:

- Promote community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed
- Promote use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; and promotes use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions
- Include measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.

Core Principle 4: Social Considerations – Land Acquisition and Loss of Access to Natural Resources

Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.

Key Planning Elements:

As relevant, the Program to be supported:

- Avoids or minimizes land acquisition and related adverse impacts;
- Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy;
- Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access;
- Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and
- Restores or replaces public infrastructure and community services that may be adversely affected.

Core Principle 5: Social Considerations – Indigenous Peoples and Vulnerable Groups

Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

- Undertakes free, prior, and informed consultations if Indigenous Peoples are potentially affected (positively or negatively) to determine whether there is broad community support for the program.
- Ensures that Indigenous/underserved Peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples.
- Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits.

Core Principle 6: Social Considerations – Social Conflict

Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

Key Planning Elements:

- Considers conflict risks, including distributional equity and cultural sensitivities.

7.2 Analysis of the ESSA Findings against the Core Principles

Based on the key findings of the assessment, this section presents an analysis of the consistency of government's environmental and social management systems with the World Bank core principles of PforR financing. System consistency is analyzed against each core principle by adopting Strength, Weakness, Opportunities, and Threats/ Risks (SWOT) analysis approach in the context of PforR financing instrument.

- **Strengths:** where the system functions effectively and efficiently, and is consistent with PforR financing.
- **Weaknesses/ Gaps:** gaps in the system with respect to the PforR financing.
- **Opportunities:** favorable factors for the strengthening of the system.
- **Risks/Threats:** potentially adverse/negative factors, if unaddressed, able to undermine the effective use of opportunities for system strengthening.

Core Principle 1: General Principle of Environmental and Social Impact Assessment and Management

Applicability:

The applicability of Core Principle 1 to the proposed GEQIPE AF program would emanate from the desire of the program to achieve its PDO which is stated as: *“to assist the Government of Ethiopia in improving internal efficiency, equitable access, and quality in general education”*. During the ESSA consultations and field observations carried on both the refugee camp and host community schools, it was noted that one of the important factors affecting access and quality of education in both the host community and refugee camp schools is shortage of classrooms. Many of the lower and upper primary refugee schools are observed to have oversized classes ranging 80-120 students (e.g., ARRA Bambasi primary school, ARRA Jewi Primary school, etc). In addition lack of fences for school compounds, properly leveled sporting fields, shortage of water supply and sanitation facilities are also among the challenges faced that affect the effort of refugee and host community schools to provide better school environment to their students. In the face of such evident challenges of the schools that seek for immediate interventions, and in order to achieve the PDO, the GEQIPE AF program will be compelled to finance construction of additional classrooms, school fences, drinking water taps and perhaps additional sanitation facilities. The procurement and use of chemicals and equipment to alleviate the prevailing absence and/or shortages in the upper primary and secondary school laboratories will also be an issue to focus on from environmental safeguards perspective.

In most cases, as observed during the ESSA field assessment, the construction activities to expand classrooms, build fences, and leveling sporting fields, etc. are likely to take place within the existing school compounds. However, the undertaking of such construction activities is likely to have limited potential impacts on the biophysical environment and on the health and safety of the school community. According to the EIA procedural guideline (2003) of the EFCCC, development of school sub-projects are classified as schedule 2 activities, and when carried in small scale as schedule 3 activities. Hence, there will be a need to prepare limited scope environmental management plans for the sub-projects. Therefore, all construction activities will be managed in conformity with elements of OP/BP 9.00 Core principle 1 which is embedded in the National EIA system and then adopting the plan before the commencement of each renovation activities.

Strengths:

- The Country has adopted the key principles of environmental and social management and sustainable development at different levels of its main legislations and policies including in the FDRE Constitution and Environment Policy of Ethiopia. The EPE (1997) is aimed at guiding sustainable social and economic development of the country through the conservation and sustainable utilization of the natural, man-made and cultural resources and the environment at large.
- The Country has put in place EIA Proclamation No.299/2002 which defines the fundamental requirements and procedures for environmental and social impact assessment. The EIA proclamation provides the legal and regulatory framework that guide environmental and social

impact assessments applicable at National level. This Federal EIA law has been in force for nearly two decades and hence its systemic enforcement was growing and expanding over the years. Some of the Regional states involved in the implementation of GEQIPE AF program such as Tigray, Afar, and Somali regions have already enacted their version of EIA regulations based on the Federal EIA law to further contextualize and strengthen the EIA system in their respective jurisdictions.

- Article 4(1) of the Federal EIA proclamation and relevant sections of the subsequent regional EIA regulations highlights some of the main aspects for consideration while carrying impact assessments. These include site location, nature of project, cumulative effects, duration, reversibility or irreversibility of the effects of the project e.t.c. There are also other provisions in the Federal EIA proclamation such as article 8(1&2) which require to provide sufficient information in EIA reports and outlining the minimum information requirement EIA reports should contain that are essential for informed decision making during EIA review and approval. Consideration of these aspects by the EIA law would confirm with the principles and key planning elements of Core principle 1 of the OP/BP 9.0 on environmental and social risk management.
- The Inclusion of concerns and opinions of affected communities in the EIA study process is also considered as one important issue in preparing an acceptable EIA both at Federal and Regional levels. The Federal EIA law (and relevant sections of subsequent regional EIA regulations) has also made it clear in article 15(1) by stating that the Authority (i.e. EFCCC) or the relevant regional environmental agency shall ensure that the comments made by the public and in particular by the communities likely to be affected by the implementation of a project are incorporated into the environmental impact study report as well as in its evaluation. In a similar move with other regional state environment protection offices, the Tigray, Afar, Somali, Gambella and Benishangul Gumuz EPAs does not consider an EIA report not consisting of evidences for community consultation as acceptable one for review and approval.
- The implementation of the Federal EIA proclamation by the EFCCC and the Regional Bureaus is also supported by EIA procedural guideline (2003) and ESMP preparation guideline (2004) which provides the essential procedural steps for carrying out EIA and the required minimum contents of an ESMP. The EIA procedural guideline requires that prior to the commencement of EIA studies, pre-screening consultations, screening and scoping exercises needs to be done in order to Categorize the proposed project into one of the three schedule of activities (Schedule I, II or III). The EIA procedural guideline has consisted in its annexes the list of project types that are categorized under the schedules I to III. On the other side, the ESMP preparation guideline requires ESMPs to consist of summary of identified impacts, proposed mitigation and enhancement measures, institutional arrangements for implementation of the mitigation and monitoring measures, and preliminary cost estimates to ensure mitigation and monitoring measures are adequately funded for implementation. These guidelines are widely applied not only by the EFCCC at Federal level, but more or less by all regional EPAs including the GEQIPE AF target regions (i.e. Tigray, Afar, Somali, Gambella and Benishangul Gumuz Regional states).
- The country has well-defined legal/regulatory systems for safeguarding environment and ecologically significant areas from pollution, for excluding activities that are likely to have significant adverse impacts on eco-sensitive areas, forest and hilly areas and wetlands.

- The Country has environment protection institutions at Federal and Regional levels mandated to enforce the EIA Proclamation and other environmental management related policies and legislations. EFCCC is the Federal environment institution responsible to enforce the EIA law at National level. The Regional Environment institutions in the five GEQIPE AF target regions responsible for enforcing the EIA system are generally named as Environment protection, land utilization and administration bureaus (EPLUAB) except some minor modifications for Gambella and Somali regional state bureaus. Three of the regional environment bureaus in the target regions have a structure that expands down to Woreda level (i.e. Tigray, Afar, Benishangul Gumuz regions). Whereas the Federal EFCCC is responsible for enforcing the EIA law on development projects licensed by the Federal Government and on those that will have trans-regional impacts, the regional environment protection bureaus are generally responsible for enforcing the EIA law on development projects licensed by their respective regional authorities. Within the regional environment protection bureaus, the woreda level offices are usually mainly responsible for carrying out environmental performance monitoring of approved project ESMPs and for review and approval of Schedule III sub projects.
- The School Management Committees and PTSA at grassroots level are functioning well and are taking up the responsibility of school environment improvement and management.

Weakness/Gaps

The analysis identified significant gaps in how the system functions or operates in actual practice, which constrains the ability of the EIA process to be a meaningful tool for utilization in sector-specific development programs/projects such as GEQIPE AF. What follows is an analysis that focuses on performance gaps in the application of the national system for environmental management in the context of GEQIPE AF.

- Overall, the analysis found that while there is a national legal and regulatory framework for environmental management, a system-based approach that enables to address the environmental impacts of GEQIPE AF is generally weak and not in place in the main implementing agencies, i.e. AARA and the MoE. In the education sector (MoE) the Environment Unit in MoE is yet to be established, and the existing Environment desk under the Program department in AARA is weak and needs streamlining its focus to undertake environment and social safeguard activities. The education sector (particularly MoE and its regional and woreda level counterparts) has no defined system for EIA and for collecting and managing environmental data on its impacts. However, this system is required as per the dictates of Proclamation No 295/2002 which requires the establishment of *Sectorial Environmental Units*.
- There is a general low level of awareness and implementation practices of safeguard instruments such as GEQIP-E and/or DRDIP ESMSG and ESSA in the Regional and Woreda Education Bureaus and in ARRA zonal and camp level offices.
- At national level, there is a general shortage of resources to update the existing EIA law, EIA and ESMP procedural guidelines based on the practices and experiences gained through the past years of implementation and also to provide technical support to the regional environment bureaus to build the enforcement capacity of the EIA law. The shortage of resources includes both technical expertise, man-power and budgetary constraints necessary to support the regions.
- With the growing number of development programs implemented by the regions, the regional environment protection bureaus found in the five target regions for GEQIPE AF are increasingly facing shortages of logistics (e.g.: PCs, environmental monitoring instrument/kits), man-power

and budget resources to review and approve Environmental and Social screening reports as well as to carry environmental performance monitoring. Currently, many of the regional environment bureaus are involved in the review and approval of environmental and social (E&S) screening reports from World Bank programs such as ULGDP/UIIDP, AGP, DRDIP, One Wash, RPLRP, etc.

- There is still a gap in the level of awareness on ESMSGs and screening procedures in some of the woreda environment offices and hence need to provide continued capacity building training on environmental management focused on EIA methodologies, safeguard instruments such as ESMSGs to ensure presence of adequate capacities in the regions and woreda environment offices which are affected by high staff turn-over.
- The E & S screening reports and EMPs to be prepared by the GEQIPE AF sub projects are expected to be done either by the regional or woreda level environment protection offices depending on the regional arrangements which vary from one to the other. Though there are encouraging performances by some of the Woreda Environment offices in actively carrying the review and approval of E & S screening reports in some of the target regions (e.g.: in Tigray region for DRDIP subprojects), the other target regions lack strong coordination in carrying such activities in coordination with their woreda environment branch offices (e.g. Afar and Benishangul regions). Thus there is a need to strengthen the gap in coordination between the regional and woreda level environment offices to expedite the review and approval process.
- The regional and woreda level environment bureaus have shortage of transport facilities to undertake verification of E&S screening reports by visiting sub-project sites before approval, and to carry environmental monitoring on implementation of approved EMPs, etc. Though the DRDIP program had provided motorbikes to some of the Woreda environment offices in the past, these challenges remain to be common to all the target regions and are especially evident in bigger regions such as Somali regional state where the refugee camps are situated wide apart from the regional capitals by several hundreds of Kilometers (e.g., the Dollo Ado Refugee camps).
- Overall, there is a shortage of environmental and social experts, which is manifested both nationally and within the education sector. Nationally, the shortage is observed in the technical support provision capacity of the EFCCC and the Regional Environmental Authorities, which has not been effective due to the human resource constraint. Within the environment sector (both at the Federal and Regional level), there is an insufficient number of experts who tend to be overburdened to provide technical support, including capacity building in the context of environmental management and EIA.
- MoE has not put in place the required structure and do not develop the necessary capacity to manage environment and social management issues yet. It is still in the processes of preparing ToRs for recruiting environment and social experts for the environmental and social management unit to be established. The ESSA identified limited institutional and technical capacity within MoE and at regional and local woreda levels, particularly in the preparation and implementation of environmental and social management instruments.
- Budget resources dedicated for environmental and social issues management are a chronic problem with respect to on time environmental management. Despite the requirement of some donors for the inclusion of budgets for the environmental management of development activities in Ethiopia, this remains to be far adequate in terms of implementation.

Opportunities:

The Country has put in place various environmental management policies, legislations and guidelines that support the development of broader environmental protection and management systems in Ethiopia. It has also been exercising the implementation and enforcement of these environmental protection and management laws through the environment protection institutions it established both at Federal and Regional levels. Though implementation and enforcement of the environmental protection and management systems in the country has been going for nearly two decades spearheaded by environment protection institutions at federal and regional levels, more needs to be done to strengthen the performance capacity of the system.

Strengthened institutional capacities for environmental and social management in the environment protection institutions at the target regional and woreda levels, in the Ministry of Education and its regional and woreda level bureaus, AARA and its zonal and camp level offices would create an opportunity that can be rolled out through the Program. In line with this, there are opportunities to strengthen the capacity of these by:

- provision of training on the preparation, review and approval producers of ESIA and other environmental and social instruments;
- assign Environment, Social, Health and Safety (ESHS) unit/specialist in MoE and target regional bureaus as required.
- establish and strengthen coordination among national, regional, zonal and local levels of MoE, ARRA and environmental institutions;
- provision of continuous training on environmental, social and safety management instruments preparation and implementation;
- provide guidance and support during implementation of Ethiopian environmental and social impact assessment procedural guidelines, manual, including for the process and need of stakeholder consultations in impact assessments.
- Enhance and share good practices and experiences gained from DRDIP implementation in environmental and social management practices, ESMSG applications including E&S screening and approval procedures in the same target regions and woredas.
- development of technical guidelines for environmental screening and preparation of ESMP
- As required, development of hazardous chemicals and other waste disposal management plan that works for all regions, as per the international and national standards and guidelines.
- Putting in place updated written procedure, responsive GRM guideline and procedures including compensation procedures, timely and appropriate response for grievances
- As applicable, strengthen awareness raising for project affected people and customers on different issues including GRM, safety measures using easily accessible media and considering the local context of the targets
- Develop GRM Procedure and guideline as well as set in-take location

Risks/Threats:

Overall, the risk of not complying with the principles and key planning elements of Core principle 1 of OP/BP 9.00 on environmental and social risk management for the GEQIPE AF program is that GEQIPE AF subprojects with limited potential environmental and social impacts will be implemented without proper safeguard checks. Generally the risk of not addressing the identified gaps above and not capitalizing on the opportunities in a timely fashion will potentially result in the education sector as a whole, AARA and GEQIPE AF not being able to develop a system-based approach to effectively manage environmental and social impacts. Thus there will be no mechanism for addressing the limited potential impacts of the

subprojects which will be inconsistent with the principles of P for R financing. Specific risks to the proposed program will be:

- Potential environmental and social impacts of GEQIPE AF will not be identified, mitigated, and monitored.
- Activities under this program will be designed and operated without adequate attention to existing environmental settings, related ecological and social risks and impacts.
- No mechanism for safe and environmentally sound disposal of used IT equipment and other hazardous chemical wastes, including batteries.
- Community and stakeholder concerns will not be consistently taken into account in environmental, social and safety issues identification and mitigation.
- Inability to capitalize the opportunities to address the gaps in a timely fashion will lead to localized and regional environmental and social problems in program implementation areas.
- Staffing and skills mix at the regional and woreda levels is inadequate to handle environmental, social and safety management.
- Inadequate or no budget will be allocated for environmental, social and safety management and no environmental and social issues precaution and managements are applied.
- Risks are deemed substantial and should be mitigated through a combination of dedicated enforcement of national legislation and existing guidelines at all levels.

Core Principle 2: Environmental Considerations – Natural Habitats and Physical Cultural Resources

Applicability:

The applicability of Core principle 2 is generally related to the reasons given for applicability of Core principle 1 in the preceding sections. There is a general presumption that most of the construction activities that may be carried out by GEQIPE AF are going to take place within the existing premises of the schools. This will minimize the possibility of adversely affecting natural habitats or physical cultural resources. However, there are possibilities that some schools that might be located nearby natural habitats or areas rich in physical cultural heritage.

Strengths:

The EIA Proclamation (2002) and the EIA procedural guideline (2003) are consistent with Core Principle 2. Specifically, under article 7(1), the Federal EIA proclamation (and subsequent regional regulations) states that a project proponent shall undertake an environmental impact assessment to identify the likely adverse impacts of his project and incorporate the means of their prevention or containment, and submit the environmental impact study report to the Authority (i.e. EFCCC) or the relevant regional environmental agency. Moreover, the kind of adverse impacts a project proponent is required to assess includes any change to the environment or to its component that may affect flora, fauna, natural or cultural heritage, or in general, subsequently alter environmental, social, economic or cultural conditions. Thus the Federal proclamation on EIA has provisions by which it considers the issues of conserving natural habitats and physical cultural resources which are the main concerns of Core principle 2 of the OP/BP 9.0 on environmental and social risk management. Areas where Ethiopia's environmental management system functions well include the following strengths:

- The EIA proclamation is clear in the objectives of an EIA to protect the environment (natural systems);

- Annex I of the EIA procedural guideline (2003) list environmentally sensitive ecosystems that include National parks, forest reserves, wildlife reserves and sanctuaries, wildlife corridors, and areas containing endangered flora and fauna as additional criteria for screening.
- Annex II of the EIA procedural guideline (2003) list the potential adverse impacts of concern during the screening process which include consideration of effects on cultural, religious, historic, archaeological and scientific resources.
- An Authority for Research and Conservation of Cultural Heritage (ARCCH) was established by Proclamation No. 209/2000, and one of its major responsibilities is the protection of cultural heritage against man-made and natural disasters.
- Overall, the analysis confirmed that there are no significant inconsistencies between OP/BP 9.00 and Ethiopia's policies, laws, and regulations related to natural habitats.

Weakness/Gaps

No major gaps that specifically relate to natural habitats or physical cultural resources were identified given the program context. However,

- Although there are well defined environmental regulations, guidelines and procedures that are already in place, the MoE and its regional and woreda counterpart offices experience in the implementation of these legal frameworks to ensure no impacts to occur on the natural habitats and PCRs is very limited. Same is true with ARRA; through it has an environment unit under the programs department whose main focus is on environmental rehabilitation and alternative energy.
- Limited capacity to assess the potential impacts on the natural habitats and physical cultural resources, within MoE and ARRA.
- Specific capacity building activities on environment is presently insufficient and nodal environmental and social officers are not assigned within implementing agencies to ensure compliance to required environmental standards regarding PCR and natural habitats.
- No or very limited knowledge and experience in considering PCRs during the preparation of EIA, review EIAs and implementation of the recommended measures as stated in the EMP to safeguard both terrestrial and aquatic habitats.
- Existing resource constraints, lack of enforcement, inadequate public consultations and participation, lack of environmental monitoring equipment and tools, lack of training and incentives.
- No or limited resources to implement the chance find procedures, if applicable
- No or weak existing monitoring mechanisms and guidelines for environmental sound decision-making process, which still need to be established and strengthened.

Opportunities:

Similarly, the opportunities identified for core principle one are also applicable to this Core Principle. Besides, if required and applicable, environmental assessments for proposed projects under the GEQIPE AF will consider identifying the potential impacts and respective mitigation or avoidance measures to ensure no impact on the existing habitats and PCRs within and around the core school areas can be devised. The program can exclude projects that would degrade or convert natural habitat and affect physical cultural resources.

The Program provides an opportunity to develop and strengthen appropriate guidance through manuals and checklists for improved managements of natural habitats and PCRs. Suitable guidelines for

management and conservation of natural habitats and physical cultural resources can also be developed for implementing the proposed programs through sustainable practices and without causing irreversible damage to the environment. Strengthening the capacity of MoE and ARRA and other regional and local level relevant offices for environmental management in the Program will help to ensure the overall improving of bio-physical environmental settings within and around the sub project area.

Risks/Threats

There is a general presumption that most of the construction activities that may be carried out by GEQIPE AF are going to take place within the existing premises of the schools and hence it will have a minimum risk on natural habitats and physical cultural resources. However, in case of any chance find incidents or unforeseen impacts, the program will have the following risks:

- Physical cultural heritage is not well understood or listed and could be lost unintentionally
- Lack of awareness among implementing agencies on existing environmental regulations or poor capacities of implementing agencies at the local level.
- The overall risks are deemed to be low

Core Principle 3: Environmental Considerations – Public and Worker Safety

Applicability:

Core Principle 3 is applicable to the Program as some schools could use school grants for building laboratories and purchase of chemicals. The analysis found that Core Principle 3 is applicable in terms of public (i.e. students and teachers community) and worker safety during the use of laboratory chemicals, spill incidents, construction activities and disposal of wastes including expired cements and chemical containers. Since the construction activities are to be carried out within the available spaces in school compounds where students and the school community will be present, there will be concern for public safety during construction. In general the principles and key planning elements of Core principle 3 of the OP/BP 9.0 on environmental and social risk management are usually considered as integral part of the ESIA process for sub-project that is analyzed under Core Principle 1. Moreover, other existing policies and framework laws in the Construction sector, labour and social affairs sector are also key parts of the national enforcement system for public and workers safety.

Strengths

- Public and Workers safety issues are addressed in conformity with OP/BP 9.00, through Labour and Social Affairs sector proclamations and guidelines, namely the Labour Proclamation (No. 377/2003) and Occupational Health and Safety Directive (2008).
- Proclamation 377/2003 is the prevailing law that is applicable in all the five target regions of the GEQIPE AF program. The Ministry of Labor and Social Affairs and Regional bureaus of Labor and Social Affairs are responsible to ensure the health and safety of workers and the public.
- Building Proclamation no.624/2009 and regulation no. 243/2011 serves to protect the safety of the public and workers in the construction sector. These laws and guidelines are enforced by the Federal Ministry of Construction and the Urban Development and Construction Bureaus in the regions.
- Ethiopia has guidelines that enforce best practices, monitors, and enforces occupational health and safety regulations with regard to construction works. The guideline require that contractors must maintain accident registers, provide workers with protective gear, and safety standards for construction sites and post warning signs visible to the public and workers awareness about requirements, knowledge and use for personal protective equipment.

- It is expected that occupational health and safety aspects will be important during the construction of educational facilities. In this context, the Labour and Social Affairs proclamation and guideline requires that employers should keep an accident register, ensure that employees are not at risk and provide all workers with the required protective equipment.
- The EIA proclamation and its regulations contain several provisions for public and worker safety, which are consistent with and aligned with core principles 3.

Weakness/Gaps

Public and worker safety aspects are adequately covered through the aforementioned proclamations and directives. However,

- No or limited capacities are in place both in the Regional labor and social affairs bureaus as well as in the Urban development and construction offices to address the risks to the safety of public and construction site workers.
- Traditional lack of focus by the Labour and social affairs offices at regional and woreda level to enforce the health and safety laws, regulations and guidelines in the construction sector.
- The worker and public safety provisions are not always included in civil works contracts.
- No commitment and devotion to and enforcement of safety rules such as use of personal protective equipment by work contractors and sub-contractors.
- Weak or no supervision on safety management by the competent authorities in construction sector
- Lack of sufficient budget to conduct regular supervision on the compliance of national and international safety standards.
- Lack of awareness on public health and safety issues, particularly in relation to exposure to electrical and chemical hazards and workplace safety aspects in hazard prone areas
- Other gaps identified in Core Principle 1 are also applicable to Core Principle 3

Opportunities

The analysis identified several Program level opportunities to be considered and treated in the ESSA Action Plan through the technical guidance and capacity building elements, including:

- Incorporate aspects of occupational health and public safety into GEQIPE AF environmental management framework;
- Provide training in workplace health and safety procedures,
- Provision of adequate budget, logistic facilities and technical persons for regular supervision,
- Ensure that contracts for education facility works under GEQIPE AF include articles on occupational health and safety that is to be provided and signed by the contractor;
- Ensure that measures on occupational health and public safety are integrated within the program manuals;
- Efficient and scaling up the enforcement level to improve the health and safety provisions during construction and operation phase of the program and to allow standard procedures during implementation of project activities
- aware the community on safety issues

- develop a system for regular monitoring and inspection for timely prevention and remedial actions
- Improve implementation capacity of regulatory agencies to improve standards of labor safety during construction, operation, and maintenance of physical infrastructure
- Develop/adapt ESMSG that promotes safe storage, use and disposal of laboratory chemicals in schools.

Risks/Threats:

If the gaps and opportunities identified are not addressed, there will not be a system based approach for addressing the OHS issues nor would it be consistent with the guiding principles of P for R financing. In addition, the followings specific risks will be highlighted during program implementation period:

- No or limited availability of Safety protection materials at work site
- No PPE available for workers
- No or limited awareness on safety precautions and management among staffs and officials

Inability to ensure public and worker safety can result in injuries and loss of life. In addition, the risks identified for strengthening the system for Core Principle 1 are applicable to Core Principle 3. The overall risks are deemed to be 'moderate'.

Core Principle 4: Social Considerations – Land Acquisition and Loss of Access to Natural Resources

Applicability:

There is apparently no ground that the implementation of AF will cause land acquisition and loss of access to natural resources/assets. The emphasis of the proposed programs enable an integrated approach to expand core activities and reforms under GEQIP-E to refugee communities, while also supporting new activities to raise standards in refugee education, both within camp-based schools and within host community schools with Development Objective (PDO) to improve internal efficiency, equitable access, and quality in general education (O-Class to Grade 12). Therefore, it is very unlikely that the Program entail any risks of land acquisition.

UNICEF has been funding the construction of secondary high schools for promoting integration of the refugee and host communities' students in all the visited refugee camps. In Gambella, Assosa, and Shire refugee camps, high schools were constructed and still some are under construction that will be used both for the refugee and host community students. Most of the schools are constructed in the existing premises in the school compounds that are on equal distance to the refugee and host community students. However, some schools are constructed in newly acquired public and privately held lands with payment of compensation in Hitsats camp in Tigray and Tsore camp in Benishangul-Gumuz regions. As a result of this, the ESSA found Core Principle 4 is applicable for the AF.

To address any legacy issues related to land acquisition for UNICEF funded construction of secondary high schools on newly acquired land which may benefit from (or supported by) the AF, a social and environmental due diligence assessment is required to ensure whether the acquired land is in compliance with World Bank PforR financing Core Principle 4 (Land Acquisition and Loss of Access to Natural Resources). Based on the findings of the due diligence assessment and the mitigation measure to be proposed, corrective measures will be taken to ensure compliance with World Bank PforR core principle 4.

Core Principle 5: Social Considerations –Vulnerable Groups

Applicability:

This core principle is applicable to the analysis of the proposed AF on the basis of the following considerations. With the exception of Tigray region, the proposed program will be implemented in underserved areas in Ethiopia. Benishangul-Gumuz, Gambella, Afar and Somali regions are historically disadvantaged regions of Ethiopia and referred as emerging or developing regions in the country.

In addition, there are identified vulnerable groups in refugee and host communities' schools including unaccompanied vulnerable groups, special need children, girls, ethnic minorities among the refugees, and girls and women (see the discussion under section 5.4).

Strengths:

- Presence of policy frameworks to addressing the needs of special need children, unaccompanied children, ethnic minorities and girls.
- There is a separate structure responsible for handling gender and special need education and inclusions was established within MoE (gender directorate and Special Support and Inclusive Education Directorate), which is directly accountable to the Minister.
- Following the recognition given to gender equality and inclusive education a central crosscutting issue in ESDP V, a series of girls' education and SN/IE strategies were developed in order to address the critical gaps and challenges in achieving gender equality and inclusion of special need students in education and improve gender equality and inclusive education outcomes across Ethiopia's education and training sector.
- While special needs education (SNE) has been the subject of attention particularly starting in ESDP III, MoE's commitment to the issue is clearly stated in ESDP V, with specific plans to increase the enrolment of SNE students in all levels of the country's education system.
- In addition to structural arrangements in place in MoE, gender responsive budgeting (GRB) is a means of integrating a gender perspective into all steps of the budget process, including the planning, implementation and evaluation stages. The government has developed national guidelines for the implementation of GRB and advocates for two percent exclusive federal budget allocation for gender issues in the education and training sector.
- In line with the government's decentralization policy, decision making powers in the education sector have been devolved from the MoE to regional and woreda education bureaus/offices.
- Under GEQIP-E, gender and special needs education was give due emphasis

Weakness/Gaps:

- There are challenges related to coordination among stakeholders working on girls' education, including inconsistency of interventions with national direction; lack of sustainability of interventions; and duplication of efforts, which can lead to inefficiencies. Moreover, the Girls' Education Forum and the Girls' Education Advisory Committee that have been established at national level have not been evenly rolled out to the regional and local levels.
- Despite the fact that both ESDP V and subsequent guidelines endorse the need to allocate a budget line exclusively for gender equality, this has not been widely implemented across the

sector.

- Poor planning and lack of sustained commitment to address inclusive education are a part of the problem.
- Though there is a commitment from MoE, there is weak and inconsistent documentation of special need data under ARRA, with the resultant serious information deficit about what has been attempted and what has worked or has not, and why.
- Weak structural arrangement due to lack of established special need units at REBs. The present arrangement of managing SNE/IE issues through the deployment of a team at MoE and focal person in REB has proved to be a structural limitation that hampers progress in implementing the SNE/IE strategy.
- Lack of commitment on the part of implementing agencies to address safeguard issues at all levels. This is manifested in the failure to assign environmental and social safeguard experts at MoE and its regional counterparts. The focal person at MoE has left and the REBs not yet assigned focal persons for safeguards and mainstream SNE/IE issues in planning, budgeting, monitoring, evaluating and reporting.
- The budget allotted to SNE/IE is meager and hardly sufficient to implement the SNE/IE strategy.
- Inadequate awareness and prevalence of misconceptions about SNE/IE issues at high level and at community levels. There are problems related to awareness and wrong perceptions about disability and special needs in general on the part of planners, decision makers, implementers and the public at large.

Opportunities:

- Political commitment, manifested in the adoption of gender and special need responsive legal frameworks, has helped create favorable environment for gender and special need inclusion in mainstream social systems.
- The MoE has demonstrated its commitment to promote coordination, harmonization and leveraging of resources toward inclusive education and gender equality establishing a Gender and Special Support and Inclusive Education Directorates to liaise with other directorates of the MoE and development partners
- Are REBs and GEQIP-E coordination officers have received training on environmental and social safeguards including the ESMMSG. In addition, safeguard specialists will be shortly assigned that will further enhance the effective and efficient implementation of safeguard issues under the AF.
- AF have Sport for Development Component in selected refugee camps as a pilot that would contribute to (i) contribute to girls' empowerment and equality by encouraging girls' participation in sport activities; and (ii) strengthen access to education services for refugee and host community youth;

Risks/Threats:

- Presence of large number of vulnerable groups such as special need children, unaccompanied refugee minors, and girls who require special attention
- Lack of support for the special need education in the proposed AF
- Prevalence of practices related to sexual harassment, early marriage, and FGM that violate the girls right for education

- Failure to address the identified gaps and utilize the opportunities identified above will result in the possible risk of unable to achieve the desired social effects, and compromising the guiding core principles 5 of OP/BP 9.00.
- The overall risks are deemed to be moderate

Actions:

- Facilitate the employment of Environmental and Social Safeguard Specialist at national level (GEQIP-E Coordination Office) and REBs, as required, including assigning responsible local persons at Woreda and school levels
- Support unaccompanied and separated refugee children (training, hiring, and providing additional top-ups for psychosocial worker)
- AF should target vulnerable groups through supporting special need education, establish special need resource centers, sexual harassment, early marriage, support to social works (training, hiring, and providing additional top-ups for psychosocial worker), and ethnic minorities' mother-tongue education
- Properly follow and apply the legal frameworks in place to support vulnerable groups
- Application of procedures for equitable and fair treatment of vulnerable groups
- Effective use of Community organizations, women groups, youth groups and other community forums to facilitate community conversations in targeting vulnerable groups
- Build capacity on identifying vulnerable groups and application of procedures for equitable access to program benefit including in policies and guidelines to ensure equitable treatment of vulnerable groups that may be affected by the AF activities.
- Developing a capacity development training plan and implement timely on environmental and social issues
- Conduct feasibility assessment on mother-tongue education of refugee ethnic minorities
- Vulnerable groups such as special need children, unaccompanied minors, and ethnic minorities should receive special the support.

Core Principle 6: Social Considerations – Social Conflict

Applicability:

The program yields significant social benefits to the refugee and host community members, particularly to students by improving education efficiency and access to quality education for refugee and host community students; enhancing gender equity in schools; promoting Social Inclusion and Cohesion among refugee and host communities and students; and considering the vulnerable groups. However, there can be complaints and/or conflict from schools related to basic school grant and absence of meeting the needs of vulnerable groups. In addition, the proposed program might exacerbate the ethnic tension in Gambella and some camps in Benishangul-Gumuz regions as the host communities are not full-heartedly welcoming the integration and harmonization of refugee and host community education during consultations and the resistance that happened following the ratification of draft refugee proclamation by the parliament. Thus, core principle 6 is applicable on the basis of the issues discussed in this paragraph.

Strength:

- The national proclamations are also applicable in all regional states of Ethiopia. The existence of the legal frameworks is an opportunity that can serve as a basis to address complaints and conflicts related to program implementation.
- The newly ratified refugee proclamation upholds the Refugee Proclamation No. 409/2004 proposition that guarantees safe reception, promote peaceful coexistence, mutual respect, and return refugee when conditions in countries is safe.
- There is an established structure and referral system under ARRA down to camp and woreda levels named a security and peace committee that will serve to address any issue or conflict arising due to AF implementation
- In connection with conflict resolution and grievance redress mechanisms, if misunderstandings and disputes arises (e.g. implementing agencies and affected parties) during AF implementation or impact of the program, the preferred means of settling disputes is through arbitration. The number and composition of the arbitration tribunal may be determined by the concerned parties. If the complainer is not satisfied with the decision of the arbitration committee, the case may be referred to the High Court to the level of Ombudsman.
- The ones listed with respect to Core Principle 5 will also be applied.

Weakness/Gaps:

- Lack of well-established and actively functioning GRM system under MoE.
- Lack of commitment as well as resistance to implement the safeguard recommendations on the assumption that GEQIP-E ESSA recommendations do not take the exiting context of Ethiopian reality
- There are no uptake locations established and specific GRM training provided by regions to the woreda and schools
- There are no complaints and conflicts recoding system including reporting of the grievances resolved.
- GEQIP-E ESSA recommended hiring safeguard experts at MoE and its counterpart regional bureaus that fully committed to safeguard issues during program implementation. However, there is still focal person assigned that have other role and responsibility.

Opportunities:

- MoE is an attempt to strengthening the existing Ethics and Anticorruption Department to see complaints and conflict related to GEQIP-E that will also serve as a mechanism to redress any issues related to AF.
- There is a good experience and well established GRM structure from the Woeda and ARRA Zonal including the camp level in settling disputes between the host and refugee communities that could be used for the AF
- The AF will reward the commissioning of small-scale contracts with experienced local NGOs and community organizations in the primary refugee-hosting regions to deliver activities to foster interaction between refugees and host communities to overcome mistrust and build social cohesion. In addition to supporting social inclusion, it is expected that such activities could bring other benefits to refugee and host community children, including enhancement to soft skills such as teamwork and empathy towards others.

- AF have Sport for Development Component in selected refugee camps as a pilot that would contribute to the social cohesion between refugees and host communities; and strengthen access to education services for refugee and host community youth.

Risks/Threats:

- Prevalence of ethnic tensions and sometime volatile conflict between the refugee and host communities in Gambella and some refugee camps in Benishagul-Gumuz that will be manifested in schools;
- When schools do not receive appropriate school grant and/or citizens do not share benefits equality, there would be possibility of compliant and conflict during AF implementation and become obstacle for sustainability;
- Provision of school feedings and scholastic materials including school uniforms for refugee students in schools where refugee and host communities' students attend together might case conflict;
- If the relationship and integration of and sport competition of the refugee and host community students is not properly managed, personal conflicts between the refugee and host community conflict might escalate to ethnic tension/conflict in Gambella and some camps in Benishagul-Gumuz regions.
- The overall risks are deemed to be high

Actions:

The following actions are required to be implemented:

- Provide awareness raising to the existing function peace and security committee in the refugee camps on the GRM procedure including world bank grievance redress procedure;
- Establish grievance redress committee at school level both in refugee and host community schools;
- Promote information disclosure at WEB, Camps, and school notice bards to insure transparence and minimize any complaint related to corruption;
- Strengthening the GRM being established under the existing Ethics and Anticorruption Department of MoE at regional and woreda levels that will also address any conflict or complaints related to the proposed AF;
- Awareness raising on GRM to refugee and host communities to improve their awareness about the procedures for accessing GRM, understanding how the GRM functions, timelines, etc;
- Affected communities should be properly consulted and the consultations need to be documented;
- Balance service provision and quality of classroom difference among host and refugee primary schools located in the same compound;
- Employ safeguard specialist at MoE and Gambella Refugee Integration facility and assign focal persons in other refugee hosting regions at all levels;
- The ones listed with respect to distributional equity under Core Principle 5 will also apply; and
- The risk rating is high.

8. Analysis of Capacity and Performance of Key Program Implementing Agencies' Environmental and Social Management

8.1 Ministry of Education (MoE)

According to GEQIP-E ESSA, the environmental and social regulations, policies and procedures, including institutional capacity and practices of MoE indicate the existence of limited environmental and social risks associated with the proposed Program implementation. Institutional capacity assessment of MoE in the GEQIP-E ESSA noted lack of responsible unit or experts for environmental and social safeguards implementation. The responsibility to manage environmental and social safeguards rests on a focal person and the different directorates at MoE such as Special Support and Inclusive Education, Gender, Curriculum Development, and Teachers and Education Leaders' Development Directorates. As a result, GEQIP-E ESSA recommended establishing ESMS within three months of program effectiveness and safeguards capacity building activities during the GEQIP-E implementation to ensure the implementing agencies' compliance with PforR financing principles.

Instituting ESMS with the necessary resources and facilities is pertinent for the effective implementation of environmental and social issues. As a result, establishing offices for ESMS and equipping and furnishing it with the necessary facilities including strengthening existing GRM at all levels is required to effectively and properly implement, monitor and report environmental and social implementation throughout GEQIP-E implementation.

Besides, the following key actions were proposed for ensuring compliance of GEQIP-E implementation with the World Bank safeguard principles:

- i) Conduct timely and proper community consultation and stakeholders awareness raising briefing;
- ii) Program benefit sharing for non-special need vulnerable children in schools; and
- iii) Environmental and social performance review and annual audit.

In the ESMSG the ways to enable vulnerable non-special need children population to benefit from GEQIP-E activities was identified. The selection criteria include:

1. Approval letter from *Kebele* indicating families economic weakness
2. Those who are HIV/AIDS victim
3. Children of elderly who are not able to support themselves
4. Other vulnerable children who are attending school like shoe shiners, street beggars, etc

During GEQIP-E AF ESSA update, staff capacity of MoE for environmental and social management was investigated and the implementation of GEQIP-E ESSA recommended actions are assessed. MoE has the experience with carrying out environmental and social risk management by its staffs and its counterparts beginning with GEQIP-II implementation, and further strengthened with GEQIP-E. With GEQIP-E implementation, MoE and REBs staffs' knowledge and experience in the management of environmental and social issues has been improved significantly. The finding shows there is an attempt by MoE to establish ESMS including strengthening GRM. MoE has prepared ESMSG on October 2018 and assigned focal persons at MoE and REBs. Awareness raising workshop on GEQIP-E ESSA and the ESMSG was conducted to the REBs and concerned stakeholders.

Regarding GEQIP-E safeguard activities, there are MoE consulted directors who do not have awareness on what GEQIP-E environmental and social safeguard issues are including the ESSA and ESMSG. During the discussion they were requesting clarification on these concepts and the reasons why safeguard instruments are required. This shows the awareness level of MoE directorates and staffs on environmental and social safeguard is found low because of the low attention given by the implementing agency. On the other hand, GEQIP-E Coordination office has argued that they conducted awareness raising workshop to directors and REBs coordinators at Debre Zeyit town.

Generally, the finding shows lack of interest and concern from MoE for effectively implementing the GEQIP-E ESSA and ESMSG. Consultation participants indicated that the implementation of the guideline is impractical given the context of Ethiopian reality as well as time bounded nature of PforR financing where the disbursement is linked to achievement of results. Hence, according to MoE, screening of school grant, as indicated in the ESMSG, will delay the activity which also affects the subsequent disbursement of the school grant. This is because those schools that do not properly screen school grant will not get the school grant which, informants said, will affect the quality of education in that school and the whole program at risk.

The assessment team observed that the problem in MoE concerning environmental and social safeguard implementation revolves around absence of hired safeguard specialist at GEQIP-E Coordination Office as recommended in Program action plan which resulted mainly from the civil service employment procedure of the country. MoE has requested Ministry of Finance and Economic Cooperation (MOFECC) to allow employment of safeguard specialist along with other experts required in the coordination office, but still MoE did not received guidance from MOFECC. However, MoE indicated, hopefully the safeguard specialist will be in place on March, 2019 and they will try to implement the ESMSG.

However, MoE's institutional and capacity assessment in this ESSA shows that the structural and staff capacity gaps identified during GEQIP-E ESSA are still prevalent and not yet fully addressed. The ESMS is not yet well-established as there are no safeguard experts/ specialists hired and no offices with well-equipped facilities and budget at all levels including at MoE level. Similar to GEQIP-II safeguard implementation, there is a safeguard focal person who has another role and responsibility. In addition, the category and types of benefit for non-special need vulnerable children sharing will share from GEQIP-E in schools is not clearly spelled out and/or implemented.

8.2 Institutional Roles and Responsibilities in AF Implementation

The management of the education system in Ethiopia is the collective responsibility of the MoE. MoE has structure at regional and Woreda levels. These include REBs, WEOs, Universities, TTCs, and Schools¹⁶. However, the role and responsibility of administering and managing refugee education falls under the auspices of ARRA, but still there are many partners involved in refugee education. For instance, primary education is managed by ARRA, whereas pre-primary and some refugee high schools are administered by NGOs like EOC DICAC. In addition, in some refugee camps where there are no refugee high schools, refugee students attend their education in host community schools found under REBs and WEOs.

The proposed AF will be overseen by a Refugee Education Steering Committee, established as part of the Government's implementation of the Comprehensive Refugee Response Framework; and a dedicated Refugee Integration Facility, established within the existing GEQIP-E Coordination Office (PCO) at MoE and REBs, will provide day-to-day support to implementation, and necessary liaison between Government Ministries and agencies, and ensure full implementation of agreed policy and institutional frameworks.

8.3 Administration of Refugees and Returnees Agency

8.3.1 Institutional Roles and Responsibilities in GEQIP-E AF Implementation

According to ARRA informants, ARRA is undertaking a study of its organizational structure that will either transform its institutional arrangement or maintaining it's the existing one. According to ARRA, the study was in its final stage and will be finalized in the coming two or three months March or April,

¹⁶ The main institutions' role and responsibility in the implementation of education in Ethiopia is presented in GEQIP-E ESSA from page 69-74.

2019). The new revised proclamation passed in January 17, 2019 may also modify the roles and responsibilities of ARRA to some extent. To date the key mandate of ARRA is to support and maintain the physical safety of refugees as well as ensure refugees live in dignity until durable solutions are found to their plights. Moreover, ARRA takes the lead in coordinating and managing ongoing refugee programs while availing land to set up camps.

The following mandates, among others, are the major activities it carries out to fulfill its responsibilities.

- Serve as a key government agency and representative on all matters of refugees and asylum-seekers
- Establish refugee camps and managing the overall coordination of camp activities
- Provide physical protection and maintain the well-being of all people of concern
- Provide and coordinate basic and social service delivery to refugees
- Coordinate country-level refugee assistance programs
- Assist and facilitate NGO partners and other stakeholder interventions in the discharge of their activities

ARRA has its central head office in Addis Ababa, about six zonal coordination offices in the five regions hosting refugees, and twenty-eight camp offices and one liaison office. The organization is structured in four main departments:

- i) Program Implementation and Coordination
- ii) Protection and Legal Department
- iii) Finance and Procurement department
- iv) HR Development and Property Administration

The programs Implementation and Coordination Department have several program units under it that include the Education, Health, Gender and HIV/AIDS, and Environment units. ARRA is the primary implementing partner running elementary schooling in all refugee camps in the country. The majority of school-age refugees lives in camps and attend one of ARRA's 56 camp-based primary schools, operated (or overseen) by ARRA with financial support from UNHCR. ARRA's schools have historically been operated largely independent of MoE. Though ARRA itself is not engaged in directly in its management, there are about 80 camp-based pre-primary and 18 secondary schools (as of 2016/17) that provide education to the refugees which are operated by a number of NGOs; at secondary level, these are primarily World Vision International (WVI) and the EOC-DICAC.

8.3.2 Staff Capacity for Environmental and Social Management

The Environment desk of ARRA was started as early as 2011 after the Climate Change Adaptation Program was formulated to address the impact of refugee to Climate Change. Environmental management programs and practices of ARRA mainly targets mitigating the environmental impacts of refugees. Refugees utilize natural resources found around the camp areas to build their shelters, fetch fuel-wood for cooking, heating and lighting which causes deforestation and land degradation. Moreover, some refugees also maintain livestock which cause overgrazing, poor regeneration of natural vegetation and shrinking water sources in certain areas. In order to address such refugee related environmental challenges occurring around the refugee camps, ARRA in collaboration with its partners started to implement environmental management strategies focused on environmental rehabilitation and environmental protection.

The environmental rehabilitation programs were directed at planting trees, building terracing and check dams to prevent soil erosion by mobilizing refugees and local communities. Moreover, the environment

protection programs of ARRA were focused on providing alternative energy sources such as fuel-efficient stoves, solar cookers, ethanol powered stoves, kerosene distribution, etc. As a result the existing experiences and practices of ARRA in environmental management revolve around implementing such environmental conservation/rehabilitation and alternative energy provision programs.

Apart from this, during site selection for establishing new refugee camps, a committee is usually formed to carry out site selection based on established national and international criteria. The set of criteria applied includes existence of water bodies, potential for natural resource degradation, land use, host community aspects, social conflict issues and etc. which somehow address environmental and social concerns during site selection. However, EIA study is not carried on the selected sites for refugee camp establishment. For this reason ARRA has limited capacity and experience on carrying environmental and social screening of sub-projects and following up with associated EIA procedures. It appears to be less aware about the national EIA requirements, procedures and the World Bank safeguard policies.

Environmental audit is also exercised to some extent by ARRA with the help of its partners. During the focused group discussion with relevant ARRA staff, it was mentioned again that few environmental audit studies aiming to assess and quantify the scale of natural resource degradation by refugees (example, Environmental Audit of Dolo Ado area to quantify deforestation by Refugees and host communities) were carried in the past with financial help of Partners. However, such environment audit practices were dependent on availability of donor support and did not sustained.

With regard to occupational safety and health management, ARRA appears to have a commendable system for ensuring that OSH aspects are included in the relevant Program Partnership Agreements (PPA) it signs with the implementing and operating partners. In PPA agreements, such as for example for vocational trainings, the inclusion of OHS articles that ensure provision of Personal Protection Appliances and safety features to the trainees is mandatory. The implementation of this article during the course of program implementation is monitored by the program offices, environment and health officers and the M&E personnel.

The institutional capacity of ARRA in the area of environmental management is limited. The environment desk found in ARRA head office is staffed by a single environment officer and is found under Program Implementation and Monitoring Department. Two out of the six zonal offices of ARRA (i.e., Gambella and Dollo Ado) have one environment officer each and the environment positions that used to exist in the remaining zonal offices are closed off. ARRA offices at camp level do not generally have environment officers.

ARRA runs its environmental programs in collaboration with its implementing and operating partners. The implementing and operating partners which could be National or International NGOs and local government agencies are the once that carry the natural resource conservation and alternative energy provision activities on the ground in and around the refugee camps. The main implementing partners (IPs) consist of NRDEPP, Save Environment Ethiopia (SEE) and Organization for Sustainable Development (OSD). Thus the main purpose of the environment officers at the head office and in the two zonal offices is to carry monitoring and evaluation of the natural resource conservation and alternative energy provision programs implemented by the Implementing and operating partners in the refugee camps.

Overall, ARRA appears to have limited capacity and experience on carrying environmental and social screening of sub-projects and following up with associated EIA procedures. It appears to be less aware about the national EIA requirements, procedures and the World Bank safeguard policies.

8.4 Performance of Environmental and Social Management Systems at regional level

In the context of the present proposed AF Program, and it being a Category B project, the regional environmental protection bureaus of the five refugee hosting regions are going to play a major role during the implementation of the ESSA and its associated guidelines. For that reason, it will be more important to focus on the capacities, performances and challenges of these regional institutions which will be directly involved in the daily review and approval of the environmental and social assessment instruments for sub-projects.

The regional environmental agencies are responsible for coordination, formulation, implementation, review and revision of regional conservation strategies as well as environmental and social monitoring, protection and regulation (Article 15). Relating to ESIA specifically, Proclamation 299/2002 gives regional environmental agencies the responsibility to evaluate ESIA reports of projects that are licensed, executed or supervised by regional states and that are not likely to generate inter-regional impacts. Regional environmental agencies are also responsible for monitoring, auditing and regulating implementation of such projects. The institutional standing of regional environmental agencies varies among regions. In some regions, they are established as separate institutions, while in others they are within Regional Sector Bureaus (e.g., Bureau of Land Use Administration).

It was observed during the ESSA preparation that all the five refugee hosting regions under consideration (i.e. Tigray, Afar, Somali, Gambella and Benishangul regions) have established their own Environment Protection Bureau (REPA) since long time (see Table 8). In particular, the REPA's in three of the five regional states (i.e. Tigray, Benishangul Gumuz and Afar regions) have expanded their structures down to the woreda level, which creates conducive situation for implementation of the proposed AF program ESSA/ESMSG on the ground. Though the woreda environment protection offices are immediately accountable to the Woreda administrator, they also report to the regional REPA. The Somali region REPA is currently working on recruitment of new staff for expanding its structure down to the Woreda level. The Gambella regions REPA exists at regional bureau level only.

Regarding the division of responsibilities between the regional REPA offices and those having woreda level offices for carrying the review and approval of E&S Screening reports, the mandate to review and approve schedule III (Category C) screening reports and to conduct implementations monitoring of approved EMPs is given to the Woreda environment protection offices. The review and approval of EIAs and EMPs prepared for all Schedule I & II (Category A and B) projects are still handled by the REPA head offices. However, in practice, it was observed that except in Tigray region almost all E&S screening reports are submitted to and reviewed by the regional REPA head offices in the four refugee hosting regions.

In Afar and Tigray regions, under the regional environment protection organs, there is one social expert in the EIA core process. However, Afar, Somali and Benishagul-Gumuz region environmental bureaus lack social experts in EIA core process. However, there is lack of social experts at zone and Woreda levels that could identify the potential social impacts of development projects at ground level and proposed appropriate mitigation measures. But all regions have land administration and compensation estimation team down to woreda level.

Role in the Implementation of the proposed AF: The REPAs will be responsible to discharge their regulatory services to the proposed AF program through the review, approval and implementation monitoring of E&S screening reports and ensuing EMPs as appropriate. Following the E&S screening of school grant subprojects of the proposed AF program, the REPAs and/or the woreda branch offices will review and approve it and will issue an environmental permit/ license where applicable. The REPAs will undertake environmental monitoring and audits where required to ensure that the implementing agencies are complying with their Environmental Management Plans (EMPs) and to verify their commitments to implement the mitigations. Table 8 shows the existing competent environment

authorities at regional level and the status of regional environmental regulations that define the applicable environmental and social management systems in the region.

Table 8: Summary of existing institutions and critical legislations for Environmental and Social Management at regional level

Region	Responsible Regional Environment Bureau/Agency	EIA Regulations enacted at regional level	1 Other Environmental Key Management Legislations/guidelines			2 3 Remarks
			Pollution Control	Solid Waste Management	Regional guideline for EIA	
Tigray	Tigray EPLAUA	Yes	Yes	Yes	Draft	Apply Federal EIA procedural guideline
Benishangul-Gumuz	Benishangul Gumuz EPLAIB	No (Draft level)	No	No	No	Apply Federal EIA law & guideline
Gambella	Gambella EPFCC	No (Draft level)	No	No	No	Apply Federal EIA law & guideline
Afar	Afar EPRLUA	Yes	Yes	No	No	Apply Federal EIA procedural guideline
Somali	EPMEDA	Yes	Yes	Yes	Yes	

Broadly speaking, activities of the five refugee hosting region REPAs in enforcing the environmental and social management systems in their respective jurisdictions are increasingly growing over the years. The implementation of multiple World Bank financed programs such as ULGDP, DRDIP, RPLRP, AGP, One Wash programs, e.t.c in the regions have already created practical experiences in the review and approval of E&S screening reports and environmental performance monitoring of ESIA/ESMPS. The awareness and application of ESMF, ESSA, ESMSG requirements from the past and present World Bank financed programs in the head offices of REPAs has comparatively increased. To some extent, the REPAs also conduct environmental monitoring of sub-projects based on the approved ESMPs. The REPAs of the five refugee hosting regions are also continuing their efforts to expand the EIA enforcement practices to the public and private sector investment projects. For example the Somali EPMEDA stated that it has already started to implement the ESMS guideline issued by the Ministry of Finance and Economic Development which urges the five identified sectors (i.e. Bureaus of Agriculture, Health, Education, Water resources and Road development) to submit E&S screening reports for their infrastructure development projects.

The involvement and implementation practices of the environmental and social management systems at woreda level environment protection offices vary among the five refugee hosting regions. Whereas the woreda environment protection offices in Tigray region undertake the review and approval of schedule-III (Category-C) E&S screening reports (e.g. review of DRDIP sub-projects) and also carry environmental performance monitoring, similar woreda environment protection offices in Benishangul region do not play any active role in the review, approval and follow up monitoring processes. In Afar region the regional REPA often tries to include the woreda environment protection office during sub-project site visits carried at the E&S screening review stage to facilitate for its engagement in follow up monitoring, but the E&S screening reports are reviewed and approved by the REPA head office.

Despite the improvements gained on the implementation practices and experiences of the five refugee hosting region REPAs, there are shortcomings and gaps which challenge their operational activities. The main gap identified includes:

- With the growing number of World Bank financed program sub-projects in the regions, the number of E&S screening reports being submitted for review and approval to the REPAs are also increasing. As a result most of the REPAs in the five refugee hosting regions are facing shortage of man-power and budget resources to conduct the review process including conducting site visits for verification of screening reports.
- Though few World Bank financed programs being implemented in the refugee hosting regions such as DRDIP and AGP2 have previously provided a motorbike to limited woreda environment protection offices in some regions, both REPA head offices and many other woreda level environment protection offices have shortage of transport facilities which constrain their environmental monitoring activities to follow EMP implementations.
- Lack of coordination between the woreda environment protection offices and REPA head offices in conducting joint coordinated site verification, review, approval and follow up monitoring on sub-project E&S screening as well as ESMPs. Capacity building support to enable planned and coordinated joint activities with woreda environment protection offices will contribute to lessening the shortage in man-power and avoiding conflict of interest issues that may arise at woreda level.
- Shortage of resources for capacity building and training for technical staff in the woreda and regional environment offices and ensure continuity, IT and office logistics, for obtaining environmental monitoring field tool kits and laboratory instruments. Some existing woreda environment protection offices (e.g. Benshangul region woreda EP Offices) have general awareness gap on ESMSG and screening procedures and need for continued awareness raising and training to enable its capacity will be necessary.
- Gaps in awareness of higher management organs on safeguard instruments (ESSA, ESMSG) and associated procedures at woreda and region levels.

8.5 Proposed Institutional Arrangement for Environment and Social Safeguards Implementation of AF Program

The institutional arrangement for the management of environmental and social impacts and risk under MoE and ARRA is found low. The ESMS establishment under MoE as proposed in the GEQIP-E ESSA is not operational, except few steps exerted like preparing the ESMSG, establishing GRM, and providing awareness raising workshop. Therefore, to effectively address identified environmental and social risks and impacts and ensure compliance of the AF activities implementation with the PforR core principles a safeguard specialist should be hired at MoE within the National Refugee Integration Facility to be established in GEQIP-E Coordination Office.

In addition, almost half of the refugee population in Ethiopia is found in Gambella region. On top of this, as discussed above, there is ethnic tension and fragile refugee and host community interaction. Following the endorsed national refugee proclamation by the Parliament, resistance and incidence of demonstration was also observed in Gambella. As a result, to properly manage the integration of refugee and host community, one safeguard specialist is also required in Gambella Region Refugee Integration Facility. In the Regional Refugee Integration Facilities of four regions (Benishangul-Gumuz,

Tigary, Afar and Somali) and all AF implementing WEOs, dedicated safeguard focal persons will be assigned.

8.6 Grievance Redress Mechanism (GRM)

GEQIP-E ESSA report found that the GRM in GEQIP-II is weak and identified the following major shortcomings in the GRM system:

- absence of recorded and compiled data showing the type, volume, frequency and handling of the complaints made;
- Lack of in-built and independent GRM structure established for the purpose of responding to complaints and grievances arising in the implementation of GEQIP sub-project activities.
- Lack of knowledge and awareness on the part of regional and *woreda* implementing agencies (IAs) regarding the rationale and need to have a working GRM system.
- Lack of due attention on the part of MoE to make sure that a functional GRM structure is in place to effectively address the complaints and grievances of affected groups.
- Lack of social development specialists assigned as a focal person at MoE to coordinate and monitor the proper addressing of social issues including complaints and grievances

As a result, GEQIP-E ESSA recommended to strengthen the existing GRM at MoE and its counterparts will be strengthened through (i) establishing GRM committees and uptake locations at all levels (federal, regions, zonal, Woreda and school levels); and (ii) awareness rising trainings and forming GRM committees starting from federal-regional-Woreda-school levels.

To effectively address the gaps identified in the ESSA, ESMSG was prepared as recommended in GEQIP-E PAD's PAP. As a result, to ensure the incorporation of an in-built GRM structure into the program design, with a view to providing an appropriate response to the legitimate complaints and grievances of affected people and groups in a timely, transparent, and cost effective manner was presented in the ESMSG. The ESMSG presented Grievance Redress Procedure to be followed including the use of the Bank's Grievance Redress Service (GRS). The ESMSG clearly presented key considerations in settling conflicts and complaints: (i) Grievance Submission Method; (ii) Registration of Grievances; (iii) Management of Reported Grievances; (iv) Grievance Log and Response Time; (v) Disclosure of the GRM; and (vi) Grievances Reporting Mechanism that also apply for AF (see GEQIP-E ESMSG for detail, Page 42-45).

The finding of this AF ESSA shows there is an attempt by MoE to strengthening the GRM as recommended in the ESSA. The existing department under MoE, namely Ethics and Anti-corruption Directorate and its regional and Woreda sections are given the responsibility to address any compliance or conflict related to GEQIP-E implementation. Capacity development trainings were delivered to the directorate at MoE level and will be cascaded down to Woreda and school levels. In addition, a GRM committee was established at MoE level and official disclosed on MoE's notice board.

For complaints that are not addressed harmoniously at the school, *Woreda* and zonal levels, it needs to be brought to the federal level following the appropriate procedure. It is also important that the GRM needs to be designed to be preemptive and it is necessary to establish a procedure that helps to get feedback by reaching out to the program beneficiaries via mobile technology or in person. The GRM has included disclosure, grievance submission method, registration of grievances, and management of reported grievances, grievance lodge and response time as well as grievances reporting mechanism.

Under ARRA, during consultation and field visits in refugee camps, there is a functional GRM in all camps the will also serve for the AF program. Generally, there are two ways to redress conflicts and complaints: (i) Intra-conflict redress mechanism; and (ii) Inter-conflict redressing mechanism.

i) Intra-conflict Redress Mechanism

Intra-conflict redress mechanism targets managing complaints and conflict occurring within the refugee or within the host communities. Settling disputes or complaints falls either on the hands of ARRA (refugee conflict/complaint) and local authorities (host community conflicts/complaint). ARRA protection unit is responsible in settling internal refugee conflicts and maintain the peace and stability of the camps. In order to settle refugee grievance, in every camp, there is an established system. At lower level, i.e., household level, there are block managers who work closely with residents in each block and settle disputes between neighbors. When cases are beyond their capacity and power, they refer to Zone leaders, and then to the refugee central committee (RCC), established by ARRA and have given responsible to manage the peace and security of the camps. Procedurally, the RCC report to camp managers and then refer to ARRA protection office.

In refugee camps, there is a temporal court system established by ARRA and RCC where minor cases are investigated and decisions are made. When the case is serious, they refer to the national legal justice system. There are also refugee community polices in all refugee camps. The refugee polices are responsible for capturing perpetrators and investigating cases. When they caught criminals or received cases of complaint, they took the case to the refugee temporal court.

There are NGOs working on peace building in refugee camps. For instance, in Gambella refugee camps, IMC and Plan International established peace clubs in schools and provide awareness raising on the importance and benefit of peace.

Basically, host communities complaints and conflict are handled by the local authorities and settlement follows the formal procedure. However, the traditional conflict redress mechanism is given priority. In all refugees hosting region, local communities have their own tradition of managing conflicts. For instance, there are tradition conflict redress mechanisms like “*Afar Ada’a*” in Afar which is led by clan leaders. The *Afar Ada’a* will pass on decision on perpetrators within 40 days after the conflict or criminal act is commuted. The clan leaders have the power to sentence death penalty on perpetrators depending on type of crime committed. However, if the perpetrator of a crime is first captured by government body, the process will be handled or passes through the legal court system.

ARRA Informants indicated that though there are RCCs and community policing in the refugee and host community, most of the conflicts are settled traditionally. There are no conflicts between refugee and host communities in refugee camps as host and refugee communities speak the same language, have the same culture and their way of life is alike. Refugee and host communities use the same market centers and they buy and sell good to each other. Additionally, most refugees in pastoral regions of Somali and Afar are relatives and there is no large refugee and host community conflict.

ii) Inter-conflict Redress Mechanism

Inter-conflict is a conflict that occurs between host and refugee communities. The way in which host and refugee communities conflicts and complaints addressed differs from intra-conflict redress mechanism. There is a jointly established functional Conflict redress committee, named Security and Protection Committee in all refugee hosting areas, commonly composed local government bodies and ARRA to address any conflict between the refugee and host communities.

The Security and Protection Committee is established and strengthened by ARRA, Woreda Police and Security Office, host communities, and refugees. Sub-committees were established at refugee camp level composed of host and refugee community representatives, Kebele administration, community police, Justice Office, and ARRA camp managers/protection officer. Under ARRA, there is a Security and

Protection Unit utterly responsible for managing grievance and provide timely solution for any complaint related to refugees.

Furthermore, conflict and complaints are managed by established community policing in both refugee and host communities. A joint committee meets every two weeks to discuss any security issues in the camp and host communities. Sometimes when the need arises, the committee meets weekly.

ARRA's GRM applies to refugees within the camps and to relations between refugees and host communities. MoE is required under the parent program to ensure a functioning GRM at all levels including in public schools (i.e. outside refugee camp schools). During the AF program implementation process, both GRMs will need to continue to function simultaneously.

There is a GRM in place accessible to children (students) in refugee camps. The children present their complaints, if any, to the ARRA protection officers or school directors if the case is related to education. Then, procedural it reaches to the camp managers. If the case is related to GBV, the children report their cases to the community social workers, and the case will be reach to the highest level. However, at school level there is no well-established and officially recognized GRM system with office and budget. The host community schools with refugees in secondary schools, there are no GRM systems established that treat refugee-host community students conflict/complaint. Similarly, students present their complaints, if any, to school directors. When cases are serious, the cases are reported to ARRA protection/camp manager (when it is related to refugee students) and the host community students' parents to take disciplinary measures.

According to World Bank Grievance Redress, communities and individuals who believe they are adversely affected by a Bank-supported project may submit complaints to existing project-level grievance redress mechanisms or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns and impacts. Project affected communities and individuals may submit their complaint to the Bank's Independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of the Bank's noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the Bank's attention and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's corporate GRS, see <http://www.worldbank.org/GRS>, and Bank's Inspection Panel, see www.inspectionpanel.org.

9. PforR Proposed Program Environmental and Social Benefits, Impacts and Risks

Environmental and Social impacts and risks discussed hereunder are those impacts and risks that will occur or affect the proposed program implementation.

9.1 Environmental and Social Benefits

9.1.1 Environmental Impacts

The environmental and social risks of the proposed AF are connected with the operational activities of sub-projects supported by the program. The environmental and social risks will need to be viewed with a life cycle approach covering the various stages of its development, use and final disposal. Accordingly, the following major environmental and social risks are anticipated to arise during program operation.

i) Safety risks related to storage, handling and disposal of laboratory chemicals

One of the main educational inputs that is totally unavailable or in short supply (i.e. in few school cases) in many of the host community and refugee camp upper primary and secondary schools is laboratory chemicals and hard wares for practical demonstrations. As a result there will be a high probability that school grants can be used for procuring laboratory chemicals and hard wares. Lack of proper storage of laboratory chemicals in the schools can expose the school community to undesired harms. In addition, disposal of laboratory wastes after carrying practical demonstrations in an uncontrolled way can also affect the safety of the school community and the environment. Therefore, unless proper mechanisms are devised to avoid and minimize the occupational and public safety hazards that may occur during storage, use and disposal of the laboratory chemicals, it can pose considerable safety risks to the school community and the environment.

ii) Risk of disposing IT facilities

It is likely that school grants can be used to procure IT facilities by the host community and refugee schools which are noted to be in short supply to establish and equip school IT centers. As a result, the procurement of computers, printers, cartridges, etc. will create a sizable IT waste downstream during operation and disposal. Thus, there needs to be mitigation options to minimize or avoid the impacts of improper IT waste disposal on the environment.

iii) Workers and community safety risk during school expansion construction

Most of the host community and refugee camp schools pose compounds that can allow them to carry laboratory, classroom or toilet facilities expansion within their existing compounds. It is also likely that such construction activities will take place during times of the year when schools are open and operational. The movement of construction vehicles in and out of the school, open ditches excavated for foundations and other related construction activities may pose safety hazards to the school community (i.e. students, teachers & other school staff) and occupational safety hazards to the workers. Thus, there will be a need to minimize the safety risks to the school community and workers that are likely to occur during program implementation.

iv) Risks related to loss of terrestrial vegetation during sport fields preparation

Some host community and refugee schools found in Gambella and Benshangul-Gumuz regions have compounds with natural terrestrial vegetation cover. Opening up spaces for preparation of sporting fields may in some cases entail clearing of terrestrial vegetation found in the area. As a result, there will be a need to minimize or mitigate the impacts of clearing the natural terrestrial vegetation.

v) Risks related to spread of malaria

It is observed that many host community and refugee schools have either inadequate or no water supply in their compounds which students and school staff can use for drinking, washing and other purposes. In these schools, it is likely that the school grants can be used to develop water supply sources or for getting connected to existing supply systems. In either option it will be important to avoid the risk of creating temporary ditches and ponds during construction and operation that will serve as breeding point for malaria mosquito. Avoiding this risk is important because most of the refugee camps and host woredas are situated in the low lands where malaria outbreak is common.

vi) Risks related to weak E&S management capacities

Weak environmental and social management capacities in program implementing agencies like MoE, ARRA, the regional BoEs and zonal/woreda/camp level offices on one side and the environment regulatory authorities like REPAs and woreda environment protection offices on the other will likely expose the proposed AF program to the risk of implementing program sub-projects without putting in place proper safeguard mitigation measures. Important sub-projects with adverse environmental and social impacts will not be screened by the program implementing agencies and get reviewed and approved by the regulatory agencies. Thus there will a need to provide capacity building for environmental and social management in both the implementing agencies and the regulatory bodies to avoid risks to the proposed AF program.

9.1.2 Social Impacts and Risks

9.1.2.1 Social Benefits of the Program

The GEQIP-E AF has the following key benefits for the refugee and host communities upon it implementation.

i) Equitable Access to Education for the refugee and host communities

Equity in access to quality education constitutes a central issue of analysis as per the proposed PforR program. Equity is one of the three 'Result Areas' in the GEQIP-E program. AF will target these priorities for quality education already supported by GEQIP-E in national schools to the refugee schools under DLI9 (Harmonization of services at refugee primary schools). The DLRs will include: (i) timely payment of basic school grant to refugee schools; (ii) in-service training or short courses as part of continuous professional development of teachers at refugee schools; and timely delivery of sufficient textbooks in core subjects to refugee schools.

In addition, under the AF, a new program of upgrading training will be developed especially for refugee incentive teachers through Teachers and Education Leaders Development Directorate within MoE, in consultation with ARRA and REBs, and delivered by regional Colleges of Teacher Education (CTEs) the will ensure quality education access for the refugee students.

ii) Enhanced Gender Equality in Education

The ESSA shows that refugee girls face early marriage, risk of harassment, and though rare, instances of sexual violence that significantly lowers their enrollment particularly at secondary level. Evidence from the baseline study of a recent project in Benishangul-Gumuz, implemented by IRC, also reveals one in five girls experienced early marriage or were cohabiting with a male as if married; and a similar number expressed low expectations about the level of education a girl should complete. Under the proposed AF, a program of life skills and empowerment classes informed by and adapted from the IRC intervention and piloted in additional regions, is another potential area of support for the IPF.

iii. Promoting Social Inclusion and Cohesion among refugee and host communities and students

Among the main activities target in the IPF component of AF is support to new activities designed to address challenge in refugee education as a result of lack of social cohesion in refugee-hosting communities and schools. The activities will be targeted to host communities, with necessary administrative and logistical arrangements to enable participation of refugee students from nearby camps.

Refugees also face significant psychological and emotional trauma as the result of displacement, loss of property and livelihoods, and destruction of social capital through disruption of communities and networks. At the same time, some refugee-hosting regions, particularly Gambella, have experienced significant tensions, and in some situations, violent confrontations between host communities and refugees. The IPF component will also support pilot activities to build socio-emotional strength among school-age refugee children, and social cohesion in refugee communities and between these and host communities. In addition to supporting social inclusion, it is expected that such activities could bring other benefits to refugee and host community children, including enhancement to soft skills such as teamwork and empathy towards each other.

With the intention to tackle ethnic tensions between refugee and host communities in some areas, including violent confrontations in Gambella region, the AF through the IPF component also targets additional activities to build social cohesion and provide integrated social space for both refugee and host community children through a program of sports and other activities.

9.1.2.2 Key Social Risks

i) Weak Environmental and Social Management System (ESMS) in Implementing Agencies

The lessons from GEQIP-II and GEQIP-E implementation shows safeguard implementation issues have been given low attention. GEQIP-E ESSA required MoE to establish the ESMS including functional GRM and preparing an ESMSG within three months of program effectiveness (GEQIP-E was effective on December 21, 2017). Output or indicators that show established ESMS are: (i) putting safeguard specialist in place with well-equipped office and required facility and budget; (ii) strengthen GRM system including up-take locations at MoE and its counter regional parts, and (iii) prepared ESMSG.

However, MoE did not hire safeguard specialist at GEQIP-E coordination office and its regional counterparts except preparation of the ESMSG (finalized on October, 2018) and the strengthening GRM which is still an ongoing activity. The assigned focal person under GEQIP-E Coordination Office has also moved to Ethnic and Anti-corruption Directorate. Hence, there is no responsible person for the implementation of GEQIP-E Environmental and Social safeguard instruments.

ARRA also does not have the experience in Environmental and Social Management of World Bank Supported projects/programs, although TA will be provided via the Economic Opportunity Program, which recently has been agreed on. However, to date it lacks well established ESMS, except an environmental officer at federal and in two zonal offices (Gambella and Dolo Ado). Therefore, during the proposed AF implementation, environmental and social safeguard issues would be given low attention and safeguard activities may be underestimated by the implementing agencies unless safeguard experts/focal persons are assigned in Refugee Integration facility at federal and region levels.

ii) Risk of escalating ethnic tension and conflict of host and refugee communities

As discussed above, there are ethnic based tensions in Gambella and some camps in Benishagul-Gumuz. Informants indicated that this conflict might be manifested among the students in schools during integration if not properly managed during AF implementation. As a result, refugee and host community integration is accepted with fear and suspicion by host communities given a big security concern, and as the majority of refugees in Gambella are from Nuer ethnic groups that are hosted in Anuak dominate areas.

This risk, under the AF program, is targeted to be addressed through activities targeting peaceful coexistence of the refugee and host community under the IPF component that will help social inclusion and cohesion between refugee and host community communities and students, PTAs, and teachers through sport and other pilot activities. Monitoring and active awareness programs that target parents and teachers would also complement this and should be considered.

iii) Prevalence of large incentive unqualified teachers

Refugee schools face shortage of teachers. ARRA has a general principle of employing more incentive teachers for first cycle primary school teachers (grade 1-4) drawn from refugee communities. Consequently, all grade 1- 4 teachers are refugees incentive teachers without certificate. Around 38 percent of teachers in refugee primary schools are incentive teachers. The majority of these teachers are not qualified, even within their home country systems, resulting in a severe lack of appropriately skilled teachers in refugee schools. Incentive teachers are voluntarily refugee teachers and working for a small stipend (805 birr per month). Informants indicated that low payment discouraged them and they are not motivated the properly teach and cultivate their students. There are also incentive teachers in the second cycle primary schools (grade 5-8) in many refugee schools due to shortage of local/national teachers.

The number of certified teachers in refugee schools is quiet small in number. For instance, in Hitsats camp, there are only seven (7 teachers) for about 2,000 students. Additionally, most teachers are teaching courses in which they were not specialized in. For example, there are teachers who graduated in English but teach physics and chemistry classes. The student teacher ratio in Jewi is one to sixty-seven (1 teacher to 67 students). This ratio is much high in Assosa refugee camps, that is, 1 teacher to 108 in Bambasi refugee primary school. Informants have a concerned that integration will cause joining of a large number of refugee students to the host community schools that have relatively better certified teachers which will further exacerbate shortage of classrooms and high classroom-student ratio.

Under the AF, to address knowledge and skill gap of incentive teachers, a new program of upgrading training is designed especially for refugee incentive teachers by the Teachers and Education Leaders Development Directorate within MoE, in consultation with ARRA and REBs, and delivered by regional Colleges of Teacher Education (CTEs).

iv) Risk related to frequent absenteeism and high dropout of refugee students

Dropout rate is high among the refugee schools. For instance, the dropout rate in Bambais Refugee primary school is 10.5%. There are a number of factors forwarded by school directors and teachers which are mainly related to the nature of refugee that contribute to high drop-out rates in refugee schools. The factors include: (i) refugee children regard camps as a temporary stay point to transit to third countries (Europe and America); (2) lack of interest to attend class in the expectation of resettlement to third countries; (3) hot temperature and difficult weather condition causing suffocation due to lack of ventilators and high classroom-student ratio; (4) existence of high number of children who are unaccompanied without someone to care for them; (5) early marriage, and (7) frequent movement

of refugee students with their parents in pastoral areas and in Gambella to meet their relatives in other areas.

Host community and WEOs informants indicated that frequent absenteeism and dropout of the refugee students might affect the learning interest and moral of host community students. The motivation and desire for education of host community students will be impacted by refugee students' lack of interest for education in some areas, particularly in Shire camps.

v) Risk of escalating girls sexual harassment and SGBV

Refugee girls face an elevated risk of harassment and SGBV including early marriage that lowers of enrollment particularly at secondary level. Evidence from the baseline study by IRC, reveals one in five girls experienced early marriage or were cohabiting with a male as if married. The field base assessment also noted that SGBV was prevalent among girls and women in refugee camps, particularly before they cross the border to Ethiopia. However, school based SGBV and refugee camps seem rare, but it may be escalated during integration.

There are cultural practices that violate girls' rights to education like early marriage, besides sexual harassment of girls. Literature shows these practices are violence against girls' right for education. There is early marriage among the host and refugee communities particularly among the Afar, Somali, Nuer and Aguna ethnic groups in Gambella, Berta in Benishangul-Gumuz, Sudanese and South Sudanese refugees in Assosa camp, and Kunama ethnic groups in Shire Camps. Marriage of girls at early age, usually between ages 13-15, resulted in high drop-out rate of girls and significant decrease in the number of girls in high schools.

In the proposed AF, a package of life skills and empowerment classes, informed by and adapted from the IRC intervention and piloted in additional regions (besides Benishangul-Gumuz), is another potential area of support for the IPF.

vi) Lack of support to mother-tongue education

Part of equity is the right to education in one's own mother-tongue, and research shows the benefits for mother-tongue learning. Early reading is a critical skill that serves as a foundation for learning in subsequent grades. Without the ability to read in mother-tongue, children will falter in primary school and perform poorly, often struggling to follow written instructions and communicate properly in the classroom. The early attainment of literacy permits individuals and societies to capitalize on returns to education, increasing demand for advanced skills, and opportunities for macroeconomic growth.

In this respect, the ESSA finding noted that existence of challenges regarding mother-tongue among the Kunama Ethnic groups due to curriculum difference between the Ethiopia and refugee Eritrean Kunama. Eritrea Kunama alphabet is Latin, whereas the Ethiopian Kunama uses the Sabina (Geez) Alphabet as discussed above in community consultation section (refer section 4 discussion above).

Similarly, in Assosa refugee camps, there are South Sudanese, Congolese, Rwandans, and Cameroonians refugees who are counted as ethnic minorities. In Assosa camps, the Benishangul-Gumuz curriculum is used and as most of the refugees are Sudanese and host communities are Berta ethnic group who speak and use Arabic language as a medium of instruction in primary school, the children of these ethnic groups attend their primary education with the medium of instruction being Arabic and English.

Host community high school students want to learn their mother-tongue and prefer schools where their mother-tongue is thought as a subject. For instance, in Sherkole refugee camps, high school (9-10) was built by EOC DICAC for the host and refugee students to attend their class together. But, most host community students do not want to attend this school as their mother-tongue (Arabic) is not thought in the refugee high school. This has made them to travel to Homosha Woreda, about eight (8) kilometers away from their home. Hence, out of 467 students (118 female and 349 male) in the high school only 33.3% (158 students of which 97 male and 15 female) are local community students.

vii) Lack of support to special need education

Despite large number of special need children in refugee camps, ESSA finding shows, special needs education in refugee camps was not given due emphasis. Except the construction of ramps, the physical environment of schools is not conducive for the special need children. Not all special need children are also attending their education. There are no cluster resource centers and special need teachers in refugee camps. Many special need children who attend education and supported by NGOs are those with physical mobility impairment. The visually impaired and those with hearing difficulty are not attending schools as they are not able to travel to the schools, lack of brail, do not understand sign languages, and lack of teachers who will support them.

In addition, most refugees and host community schools' physical environment have ragged topography and their physical environment is difficult for access to special need students. This is because, according to informants, the areas recently selected for school compound and construction are those which are inconvenient for farming and crop production.

Given that special need children are the most vulnerable; and there are no special attentions given to them in refugee camp education, some benefit packages should be designed from the proposed AF like establishment of special need resource centers, conduct awareness raising trainings, and provision of teaching aid materials.

xi) Variation in refugee and host community students' admission system

There is variation in the ways refugee students and host community students are admitted to schools. Every year, the academic calendar for registration and class beginning for the host community students is September (and the latest by October). Once this month is over, any school age children who come to attend school could not be admitted.

However, in refugee schools because of the nature of refugee, an asylum seeker student who comes lately in the middle of first semester is allowed to join the schooling giving a catch-up or tutorial classes. There are local/ national catch-up teachers hired by NGOs, for instance NRC in Shire refugee camps, who provide tutorial class that help the newly arriving students to catch those in mainstream class. However, such practice is not known and functional in the host community education system that affects the admission of refugee students in the national education who came late after the registration period has passed. This might be a risk that affect refugee and host community education integration unless standard rule will be set and agreed with MoE.

xii) Risk related to classroom standard difference and provision of school feeding and scholastic materials for refugee students

School feeding is provided in all ARAA administered refugee primary schools. In the visited Shimelba and Kebribeyah schools, the refugee and host community students attend their primary education in the

same compound, but in separate blocks. The classrooms for refugee students are built from bricks and well finished with tables and chairs. Whereas, most of host community students' attend their education in shades made of grasses and corrugated iron roofing sheets. There is shortage of desks in almost all host community schools.

Additionally, the refugee students have school feeding, but host community students not. According to informants, these have created psychological and emotional challenges on the host community students as well as their community members in general. This has become a source of grievance and complaint on the local community.

Hence, primary school integration of the refugee and host community students requires supply of school feeding for children of host community. Otherwise, if school feeding is only to be delivered in refugee schools, this might cause a high shift of host community students to the refugee schools that have school feeding. In refugee schools, there are some challenges facing school feeding including poorly prepared feeding places, shortage of washing areas and water, and lack of feeding tables and chairs.

Consulted REB heads and WEOs, in all refugee hosting regions, also noted that alike the refugee schools, school feeding needs to be supplied in host community schools as the host communities are prone to food insecurity. This will help, according to informant, to attract more children to school and reduce the dropout rate.

In secondary schools where the AF will be implementing integration, provision of school feedings, stationary materials and bags, and uniforms only to the refugee will create some difference between the refugee and host community students. Informants indicated that these provisions have some negative impacts on the host community students like discomfort and unhappiness. As a result, provision of scholastic and uniforms need to be extended to host community students.

xiii) Risks related to language barriers including medium of instruction

There is language difference in some refugee camps in Shire and Assosa. In addition, those regions having same language between host and refugee communities have also dialectal and accent differences. Informants indicated that the refugee and host communities need their children to be taught by teachers who well know their culture, dialect, and accent. Here is how the informant from ARRA reported:

Refugees in Tigray region want teachers who know their language and accent. They do not want to lose their cultural identity and accent. Hence, they do not need teachers from host community who speak a different dialect and accent. ARRA tries to manage this problem by assigning incentive refugee teachers who have a better education level, even though he/she do not have a certificate. As a result, most teachers in schools of refugee camps do not have certificate.

Since 2018, in all refugee camps, refugee students are taught using the national curriculum where Amharic is given as a subject in all high schools where refugee students do not read and write Amharic. Teacher and student informants indicated that during the Amharic period, the refugee students leave the class and stay where they like or if they wish they can attend the class. Almost all refugee students do not read and write Amharic language.

Even though the national curriculum of Ethiopia is used, Amharic is not given as a subject in the primary and secondary schools because of shortage of Amharic teachers. This has posed huge problem challenge on the teaching and learning process since teachers are forced to teach Amharic Alphabet in some high schools and in others students leave the Amharic class that caused disturbance to the students. In some

schools, the refugee students are forced to present and attend Amharic class even though they do not understand the language, while host community students were thought. As a result, the refugee students complained that their interest is not respected and this has created a challenge to them. But, Amharic subject is not graded for refugee students as they are not Ethiopian citizen.

Lack of English knowledge and skill among national teachers is a challenge raised by refugee students. Students indicated that teachers do not have English knowledge and they explain course mostly in Amharic. In addition, refugee students explained that some of the textbooks prepared in English like History, have Amharic terms that they do not understand well. A critical problem of English among national teachers is also noted by the school directors and teachers themselves, and demanded short term training or continuous professional development (CPD) for the refugee teachers; and this is targeted in the proposed AF.

xiv) Risk related to National teachers Loss of Salary and Incentive Schemes

As discussed in the consultation section above, national teachers hired by ARRA, besides better salary, have access to residence rooms within ARRA camps and have transportation services. These teachers are concerned with decrease of their salary scale as a result of the GEQIP-E AF’s harmonization and integration goal of refugee education with the national system that transfer refugee teachers into the national payroll. They noted, if they lose the incentive schemes and salary, they will leave their job and join the national schools, particularly urban schools.

9.2 Environmental and Social Risk Rating of Proposed AF Program

The identified environmental and social impacts and risks apply throughout the program life cycle. MoE and ARRA (including their regional, zonal, woreda and camp level institutions) are responsible for environmental and social risk management during proposed program implementation to ensure higher level environmental, social and safety quality in collaboration with Refugee Integration Facility at all levels and support from Refugee Education Steering Committee and other program stakeholders.

The overall risk rating for the propose AF program form environmental and social perspective is estimated as being ‘substantial’. Based on the findings of this ESSA, the risks and proposed mitigation measures discussed above are presented as follows in the Table 9 below:

Table 9: Environmental and Social Risk Rating for Proposed AF Program

No	Risk Description	Risk Management	Risk Rating
1	Weak ESMS in implementing agencies (MoE and ARRA) that would cause inadequate implementation of environmental and social issues and Safety management	<ul style="list-style-type: none"> -Recruit and assign safeguard specialist/focal persons in the national and Regional Refugee Integration Facilities to establish an Environment and Social Management system. -Develop/adapt ESMSG to address identified environmental and social risks -Based on continuing capacity need assessments, the National Refugee Integration Facility will enhance the capacity of existing and newly recruited 	High

No	Risk Description	Risk Management	Risk Rating
		<p>experts on environmental and social safeguard issues of the program.</p> <p>-Facilitate the establishment and functionality of GEQIP-E ESMS including GRM at MoE and its regional counterparts</p> <p>-Program technical staffs at regional, woreda, camp and school levels are required to undertake training on the ESSA</p>	
2	Escalating ethnic tension and conflict of host and refugee communities in Gambella and some refugee camps in Benishangul-Gumuz	<p>- Hire and deploy one safeguard specialist in Gambella Refugee Integration Facility who will work closely with the refugee and host communities to reduce the possibility of conflict.</p> <p>-Allocate budget to promote and work on the benefit of peaceful coexistence</p>	High
3	Lack of support for vulnerable groups in refugee and host community schools (like special need children, unaccompanied children, and ethnic minorities)	<p>-Establish special need resource centers at central location for refugee and host community students and equip with the necessary special need materials and trained professionals</p> <p>- Deliver awareness raising for the community and teachers, and provide material support for in school special need students</p> <p>- Build capacity of social workers and hiring new social workers as required including providing additional top-ups to support unaccompanied refugee minors</p> <p>- Conduct feasibility assessment to support mother-tongue education of vulnerable groups</p>	Moderate
4	Variation in host and refugee community students admission system	-MoE and ARRA should set and agree on the admission of lately arrival refugee students after the year's academic calendar for student registration is over.	Low
5	Frequent absenteeism and high dropout of refugee students	- Given that the refugee school PTAs participation and involvement is weak, ARRA should work to strengthen their	Moderate

No	Risk Description	Risk Management	Risk Rating
		<p>participation to reduce refugee students absenteeism</p> <ul style="list-style-type: none"> - Frequent follow-up of refugee students and provide awareness raising on the impact of absenteeism - Establish psychosocial counseling centers or locations at school levels 	
6	Provision of scholastic materials and uniforms for Refugee students, but denial for host community students attending the same schools with refugees	<ul style="list-style-type: none"> - Provide scholastic materials including school uniforms for host community students to balance service provision for host and refugee students attending the same classes. 	Moderate
7	High tendency of sexual harassment and SGBV including girls early marriage	<ul style="list-style-type: none"> -Establish safe places or wellness centers furnished with sanitary pads and water for host community students in all schools -Strengthen and support girls' clubs established in refugee and host community schools - Prevent early marriage, harassment, and SGBV practice including FGM through awareness raising 	High
8	Lack of proper storage, use and disposal of laboratory chemicals can pose considerable safety risks to the school community and the environment.	<ul style="list-style-type: none"> - Develop ESMSG (or adapt GEQIP-E ESMSG) to manage safe storage, use, and disposal of laboratory chemicals and wastes. - Provide training and ensure distribution of the guideline to the schools covered under the program. 	Moderate
9	Procurement of computers, printers, cartridges etc. will create a sizable IT waste stream during operation and disposal.	<ul style="list-style-type: none"> -Encourage reuse and recycling of the IT consumables and components to minimize quantity of waste generated downstream. -Provide guidance note on sound disposal of IT waste for schools. 	Moderate

No	Risk Description	Risk Management	Risk Rating
10	Opening up spaces for preparation of sporting fields may in some cases entail clearing of terrestrial vegetation found in the existing school premises.	<ul style="list-style-type: none"> - Minimize vegetation clearing activities by limiting site clearing to the required size only. - Encourage tree planting in and around the school compound to rehabilitate lost vegetation cover. 	Low
11	Risk of creating temporary ditches and ponds that breed malaria during development and operation of water supply to schools.	<ul style="list-style-type: none"> -Ensure that construction soil heaps will not form barriers creating stagnant waters -Ensure backfilling of trenches is conducted properly so that it may not allow the stagnation of water. -Ensure water points / public fountains to be erected will have appropriate drainage system that can avoid stagnation of water around it. 	Moderate
12	Risk related to National teachers Loss of Salary and Incentive Schemes	- maintain their current salary. If their salary would be reduced help the national teachers to get their current salary level with top-up payments	Moderate
Overall Risks		Substantial	

10. Recommended Mitigation Measures and Program Action Plan (PAP) to Strengthen System Performance

The following key actions are proposed as mitigation measures to enhance implementing agencies' capacity to properly meet the requirements of World Bank P for R financing.

1. Ensure establishment of Environmental and Social Management System (ESMS) and strengthening its functionality including GRM

The ESMS proposed under MoE was not well strengthened and is found weak. As a result, besides of strengthening ESMS under MoE, due to the complex nature of social issues in refugee hosting regions, a separate safeguard specialist for the proposed AF under Refugee Integration Facility within GEQIP-E coordination office should be well hired to properly address environmental and social issues. The proposed activities include: (i) facilitate the employment of Environmental and Social Safeguard Specialist at national and REBs levels, as required (in Refugee Integration Facility); (ii) assign responsible focal persons at Woreda and school levels as well as in ARRA Zonal offices, and (iii) support capacity development trainings including developing training plan and implement timely on environmental and social safeguard issues.

2. Support for vulnerable groups in refugee and host community schools

The ESSA shows the existence of a large number of vulnerable groups both in the refugee and host community that require special attention. The main vulnerable groups particularly of children are those with special need, unaccompanied refugee children, and ethnic Kunama, Congolese, Rwandese, etc children. As a result, in the AF has to target: (i) establishment of special need resource centers at central location for refugee and host community students and equip with the necessary special need materials and trained professionals; and (ii) conduct feasibility assessment to support for ethnic minorities mother-tongue education and implement the suggestion of the assessment.

3. Balance service provision of host and refugee schools located in the same compound and students attending the same schools

In some refugee hosting regions, refugee and host community students attend their primary education in same compound, but in a different blocks with different quality of classrooms. The classrooms for refugee students are built from bricks and well finished with tables and chairs. Whereas, most of host community students' attend their education in shades made of grasses and corrugated iron roofing sheets. There is shortage of desks in the classrooms. Additionally, the refugee students are provided with scholastic materials including the provision of school uniforms, but host community students not. These variations have a psychological implication on the students and their parents. To achieve the objective of AF and meet refugee and host community education integration as well as peaceful coexistence, social inclusion and cohesion, the service standard and classrooms for the refugee and host community students need to be similar with no variation.

As a result, the following key activity is recommended to bring the service and quality refugee and host community students classroom to same standard: Standardized the provision of scholastic materials including school uniforms for refugee and host community students attending in the same schools.

4. Prevent sexual harassment and SGBV including girls early marriage

Even though school based SGBV was reported are rare, there are also practices that violate girls rights to education like: (i) early marriage; (ii) female genital mutilation (FGM); and (iii) sexual harassment. The following actions are recommended: (1) conduct community dialogue and mobilization to reduce early marriage, FGM and sexual harassment; (2) strengthen and support girls' clubs established in refugee and host community schools; (3) fight harassment, FGM, and early marriage practices through awareness raising at school levels.

5. Strengthen the institutional capacity & coordination of the regulatory agencies

Establish and strengthen coordination between the regional and woreda level environment offices to expedite the review and approval process. Enhance and share good practices and experiences gained from DRDIP implementation in environmental and social management practices, ESMSG applications including E&S screening and approval procedures in the same target regions and woredas.

In order to improve the low level of awareness and implementation practices of safeguard instruments such as ESMSG and ESSA in the Regional and Woreda Education Bureaus and in ARRA zonal and camp level offices; there will be a need to provide continued capacity building training on environmental and social management focused on ESIA methodologies, safeguard instruments such as ESMSGs to ensure presence of adequate capacities in the regions and woreda environment offices which are affected by high staff turn-over. The existing staff of the Environment division in AARA shall also be trained to streamline their skills to undertake environment and social safeguard activities.

6. Strengthen workers and community safety prevention at workplaces

Develop or adapt ESMSG that promotes safe storage, use and disposal of laboratory chemicals in schools. Ensure that measures on occupational health and public safety are integrated within the program

manuals; Include worker and public safety prevention clauses in civil works contracts that ensure provision of continuous safety briefing and training to workers; provision of PPE and use of safety warning signs to prevent workers and community safety.

Table 10: Recommended Program Action Plan (PAP) on Environment and Social Management

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
1	Ensure establishment of strong Environmental and Social Management System (ESMS) and strengthening its functionality	1. Employment of three Environmental and Social Safeguard Specialists (one at national and one each for Gambella and Benishangul-Gumuz regions) in Refugee Integration Facility as a pre-condition to pilots	Percentage (100%) of staff in place at Refugee Integration Facility	At national and region levels	National Refugee Integration Facility, MoE and ARRA	Within three (3) months after program of program effectiveness	ESMS established Federal & Regional Safeguard staffs in place Safeguard training documents produced	GEQIP-E AF IPF Capacity Building through Refugee Integration Facilities
		2. Assign safeguard focal persons in the four regions (Benishangul, Somali, Afar, & Tigray) and Woreda level as a pre-condition to pilots	Percentage (100%) of focal persons assigned at Woreda and school levels	Regional and Woreda levels	National Refugee Integration Facility, MoE and ARRA	Within three (3) months of program effectiveness	Regional and Woreda Safeguard focal point staff in place	GEQIP-E AF IPF Capacity Building through Refugee Integration Facilities

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		3. Update ESMSG to address identified environmental and social risks	Actions taken to prepare the ESMSG	At national level	National Refugee Integration Facility or hired consultant	ToR within one month of program effectiveness ESMSG prepared within six (6) months of program effectiveness	ToR Produced ESMSG document produced	GEQIP-E AF PAP 3.1
		4. Capacity development through training by developing a training plan and implement in a timely manner on environmental and social issues	Percentage (100%) staffs trained	Federal, regional, Woreda and school levels	National and Regional Refugee Facilities	Training MoE, REB and WEO staff on safeguard instruments (ESMSG & ESSA) and requirements every year throughout program period	Safeguard training documents produced Safeguards training reports every six (6) months	GEQIP-E AF PAP 3.2

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
2.	Strengthening the functionality of existing GRM at federal, regional and camp levels and establishing accessible new GRM for workers on project pilot activities at site level	1. Develop and put in place responsive GRM guidelines and procedures including compensation procedures, timely and appropriate response for grievances	GRM guidelines and procedures produced	Federal, regional, Woreda and school levels	National and Regional Refugee Integration Facilities	Within six months of program effectiveness	GRM guidelines and procedures produced	GEQIP-E AF PAP 3.1
		3. Conduct awareness raising activities for project affected people and communities on GRM guidelines and safety measures using easily accessible media and considering the local context of the targets	Awareness raising activities conducted	Regional, Woreda, School, and camp levels	National and Regional Refugee Integration Facilities	One awareness raising activity conducted per region per quarter	Reports on awareness raising activities including number of participants and gender	GEQIP-E AF PAP 3.2
3	Support for vulnerable groups (i.e., special need)	1. Establish Inclusive Education Resource Centers	Nine (9) Inclusive Education Resource	At camp level depending on the	National and Regional Refugee Integration Facilities, ARRA,	Complete three resource centers at the end of year 1	Nine (9) Equipped and staffed Special needs resource	GEQIP-E RA 2.3 687 Inclusive Education

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
	children, unaccompanied and segregated refugee children, and ethnic minorities) in refugee and host community schools	at central location for refugee and host community students with special needs and equip with the necessary special need materials and trained professionals	Centers established and equipped with the necessary resources and staff	number of special need children	UNHCR, and REBs	Complete three resource centers at the end of year 2 Complete three resource centers at the end of year 3	centers in areas close to refugee camps for utilization both by the refugee and host community students Report on number of children served annually by each center (broken down by gender and vulnerability category)	Resource ¹⁷ Centers to be established for special need children/ students Intermediate Results Indicator 8.11a and 8.11b
		2. Include vulnerable school children with non-special needs to share Program benefits	Inclusion of vulnerable school children	School level	National and Regional Refugee Integration Facilities, ARRA, and REBs	Y1-4 Annual	Report on types of benefits delivered and number of beneficiaries by gender and vulnerability	GEQIP-E PAP 3.3.

¹⁷ 9 Inclusive Education Resource Centers should be established for special need students in areas close to refugee camps for utilization both by the refugee and host community students

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		3. Deliver awareness raising for the community on opportunities for special needs education and teachers on ways to make their classrooms and content more accessible to special needs students	Awareness raising activities conducted	School level	Regional Refugee Integration Facilities	Y1-4	One awareness raising activity per camp per year	GEQIP-E AF IPF capacity building component
		4. Support for ethnic Kunama, Murule, and others on mother-tongue education	100% ethnic minorities mother-tongue education feasibility assessment conducted Feasible mother tongue programs implemented	Shire, Gambella and Assosa Camps	Hired consultant	Year one (1) and two (2) of the Program	Prepared ToR year 1 Produced Feasibility assessment report in year 2 Implementation of the results of the assessment in year 2	GEQIP-E AF IPF capacity building component

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		5. Effective use of community organizations, women groups, youth groups and other community forums to facilitate community conversations in targeting vulnerable groups	Dialogues with community organizations, women groups, youth groups and other community forum	Woreda and school level	Regional Refugee Integration Facilities	Y1-4	One dialogue per camp per year	GEQIP-E AF IPF capacity building component
4	Balanced service provision and quality of classroom difference among host and refugee schools and for students attending the same schools in the same compound	1. Develop guidelines ¹⁸ on school and student level support) with the aim of both maximizing enrollment and standardizing conditions and their impacts between refugee and host students.	Guidelines produced	School level	National and Regional Refugee Integration Facilities, ARRA, UNHCR, and REBs	Year one (1) of the program	Guidelines for standardizing service provisions developed.	GEQIP-E AF IPF capacity building component

¹⁸ The standardization guidelines should be aligned with current MoE minimum standards and balance the differing socio-economic situation of refugees & host communities with the need for balanced service provision to enhance social cohesion. The guidelines may cover areas such as school facilities, classroom equipment, teacher/student ratios, school feedings & school support such as scholastic materials and school uniforms.

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
5	Conduct social and environmental due diligence assessment and prepare and implement Action Plan on feasible corrective measures	1. Conduct social and environmental due diligence assessment and implement identified mitigation measures, if any, to address any legacy issues related to land acquisition for construction of secondary schools on newly acquired land supported by UNICEF and DICAC to ensure the acquired land is in compliance with World Bank PforR financing Core Principle 4: Land Acquisition	100% due diligence conducted	Woreda and School levels	Refugee Integration Facility or Hired Consultant	<p>Within one month of program effectiveness</p> <p>Within six months of program effectiveness</p> <p>Year One</p> <p>Annual reports on corrective measures</p>	<p>Prepared TOR</p> <p>Produced Due Diligence Assessment Report</p> <p>Action Plan on feasible corrective measures</p> <p>Reports on corrective measures (based on the finding of the due diligence assessment) implemented, if any.</p>	<p>AF Environment and Social Commitment Plan, point 7</p> <p>IPF Capacity building component</p>

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
6	Prevention of SGBV, FGM and harassment including girls' early marriage	1. Conduct community dialogue and mobilization to reduce early marriage, FGM and sexual harassment	Number of community dialogues	Camp and School levels	National and Regional Refugee Integration Facilities, ARRA, UNHCR, MoE, and REBs	One community dialogue every quarter in the five regions throughout program period (four community dialogue in every region per year)	Community dialogue and mobilization conducted	GEQIP-E AF IPF capacity building component through pilots and placement of communications specialists within Regional Refugee Integration Facilities
		2. Conduct communications campaign to raise awareness on sexual harassment, FGM, SGBV and early marriage practices	Communications campaign conducted	Woreda, school and community levels	National and Regional Refugee Integration Facilities (Communications Specialists)	Y1 TORs and campaign plan Y2 implementation of campaign Y3 report and lessons learned	Prepared TORs Campaign plan developed Report on impact and lessons learned from communications campaign	GEQIP-E AF IPF capacity building component through pilots and placement of communications specialists within Regional Refugee Integration Facilities

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		3. Strengthen and support girls' clubs established in refugee and host community schools	Number of girls' clubs strengthened and supported	School level	National and Regional Refugee Integration Facilities, ARRA, UNHCR, MoE, and REBs	Ten girls' clubs strengthened and supported every year throughout program period (two girls' club per refugee hosting region per year)	Established girls' clubs	GEQIP-E AF IPF capacity building component to custom girls' clubs guidelines
		4. Prepare Code of conduct on SGBV for teachers in refugee and host communities to sign as part of the teacher upgrading and training activities of the project.	Established SGBV code of conduct	School level	National and Regional Refugee Integration Facilities ARRA, MoE and REBs	Code of conduct will be prepared in Year one (1) of the Program period Teachers undergoing upgrading training will sign code of conduct each year thereafter	SGBV code of conduct Report on the number of teachers signing the code of conduct	GEQIP-E AF PAP 3.5
7	Strengthen the institutional capacity & coordination of	1. Provide continued training to all	Number of trainings given to Regional,	At regional, zonal, and	National and Regional Refugee Integration	Three staffs per year per region throughout	Adequate capacities on GEQIP-E AF	

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
	the environment and social regulatory agencies with special focus on EIA and Environment monitoring directorates at regional and woreda offices	staff of ESIA, Environment and social monitoring directorates of regional and woreda level environment protection offices on GEQIP-E AF safeguard instruments such as ESSA, ESMSG, etc to help support its implementation and monitor progress	zonal, woreda environment staffs of BoE, REPA. ARRA trained on ESSA, ESMSG and EIA methodologies.	woreda levels	Facilities, REPA and woreda level offices	program implementation.	safeguards instruments in the regions and woreda environment offices created Reporting annually on number of personnel trained	

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
8	Strengthen workers and community safety prevention at workplaces	1. Develop/ adapt safety manuals on safe storage, use and disposal of laboratory chemicals in schools (linked with ESMSG) ensure availability of first aid kits in labs and provide safety training to relevant school staff.	Safety manuals on chemical storage, use and disposal prepared, training, first aid kits distributed to schools	MoE and REBs	National and Regional Refugee Integration Facilities, and Federal and regional Ministry and Bureaus of Labor and Social Affairs	Prepared together with the ESMG indicated in Action item one, sub item three.	ESMG report inclusive of community and workers safety management procedures Reports on occupational health and safety kits distributed to workers involved in use and disposal of chemicals in schools	GEQIP-E AF PAP 3.6

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		2. Provide training to increase supervisory capacity of Woreda offices and coordination with Labor and Social Affairs offices to inspect occupational health and safety	Training provided occupational health and safety	Woreda	National and Regional Refugee Integration Facilities in coordination with Labor and Social Affairs offices	Five (5) staffs trained in each five refugee hosting regions every year (25 staffs very year)	Annual reports on occupational health and safety trainings	GEQIP-E AF PAP 3.6.
		3. Include worker and public safety prevention clauses and sanctions for not implementing in the civil works contracts	Percentage (100%) of civil work contracts with safety clauses added	Civil work at woreda, school and camp level	National and Regional Refugee Integration Facilities, and regional and woreda social affairs office level	During program implementation	Annual reports from contractors on H&S	GEQIP-E AF PAP 3.6.
		4. Increase protection capacity of local ARRA offices for the security of	Protection capacity increased	Zonal and camp level	Zonal and camp level ARRA	Capacity building applications submitted every year	Annual ARRA request to Regional Integration Facility for	GEQIP-E AF IPF capacity building component

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		education personnel as necessary					capacity building funding on school level protection Annual reports on funded activities	
9	Strengthen prevention of impacts to natural habitats and PCRs	1. Strengthen the guidance for management and conservation of natural habitats and physical cultural resources as well as chance find procedures by ensuring its incorporation in the ESMSG.	Update ESMSG consisting of management and conservation of natural habitats and physical cultural resources as well as chance find procedures prepared and distributed	National and regional level	Contractors	Reports two months before and two months after sports pilot activities	Reports on prevention of impacts to natural habitats and PCRs from contractors before and after pilot activities	GEQIP-E AF IPF within sports pilot activities
10	Mitigate risk of tensions within and between host and refugee communities	1. Strengthen redressal mechanisms utilized in mitigating local tensions	Redressal mechanisms strengthened	Woreda level	Regional Refugee Integration Facilities, MoE, and ARRA	Within six months of program effectiveness	Budget in place report	GEQIP-E AF IPF within social cohesion pilot activities and capacity building component

No	Action Items	Activities/Actions	Progress Indicator	Level of application	Responsibility	Timeline	Output	Addressed in the PP
		2. Involve students within the running of the GRMs to ensure child-friendly nature.	Established student run conflict management	School	National and Regional Refugee Integration Facilities, MoE and ARRA	Within six months of program effectiveness	Annual report on involvement of students in GRMs	
		3. Integrate social cohesion into all community dialogues and awareness raising activities	Dialogues include elements of social cohesion enhancing content	Woreda and school level	National and Regional Refugee Integration Facilities	See timelines for community dialogues & awareness raising activities at PAP 2.3, 3.2., 3.4 and 6.1.	Reports on community dialogues and awareness raising activities, disaggregated by sex Reports on community participation in projects disaggregated by sex	GEQIP-E AF IPF capacity building component
		4. Prioritize areas with particular tensions for IPF pilot activities	Prioritized and promoted pilots	Woreda and school level	National and Regional Refugee Integration Facilities, MoE and ARRA	Year 1 (as part of design and site selection for pilot activities)	Reports on Prioritized and promoted pilots Implemented	GEQIP-E AF IPF capacity building component through pilot activities

11. Stakeholders Consultations and Disclosure

11.1 Consultations

The preparation of this ESSA involves stakeholders' consultations. For the ESSA preparation, the Bank has hired environmental and social consultants. The consultants undertook recurrent meetings and consultations in five refugee hosting regions with different stakeholders, including implementing agencies (IAs) and relevant institutions at national, regional and woreda levels, DPs, Civil Society Organizations involved in refugee Education, and beneficiaries who are familiar with the program and likely to be impacted or benefit from it.

The stakeholder consultations was conducted with relevant institutions to ensure the proper identification of environmental and social risks and propose appropriate recommendation measures over the program period. The stakeholders meetings and consultations have been conducted as one to one discussion, group discussion, and meetings at all levels with decision makers, experts, communities and refugee RCC members. The consultation with stakeholders explored the potential environmental and social impacts and risks of the AF program, the capacity of implementing agencies in mitigating the negative environmental and social impacts and risks associated the proposed program. Also, the consultation aims ensuring that the priority concerns of stakeholders are taken full account during program implementation.

National consultation with the relevant stakeholders on the draft ESSA was made following the guidelines of the Bank Policy on Information Access (for detailed national level consultation summary see annex 5).

11.2 Disclosure

Draft ESSA report was publicly disclosed following the guidelines of the Bank Policy on Information Access at the WB external website and in country by MoE and ARRA for review by relevant institutions prior to the stakeholders' consultation. National ESSA stakeholders' consultation was held on April 02, 2019; attendees will be from MoE, ARRA, REBs, Zone ARRA Mangers/education specialists, MoEFC, MoLSA, WB, Regional Environmental Authorities, DPs, and beneficiary representatives. The MoE will re-disclose the final ESSA after the WB's review and guidance of the revised ESSA. The World Bank will also re-disclose the final ESSA on the WB external website and request MoE for the in-country disclosure.

References Materials

ReDSS..... Local Integration Focus: Refugees in Ethiopia. Gaps and opportunities for refugees who have lived in Ethiopia for 20 Years or more.

UNHCR. 2018. The Comprehensive Refugee Response Framework (CRRF): Progress and Strategy in Ethiopia. NCRRS / CRRF Ethiopia.

IGAD. 2017. Djibouti Declaration on Regional Conference on Refugee Education is made by IGAD member states. Regional Quality Education Standards and Inclusion into National Systems for Refugee Children in line with the CRRF, SDG4 and Agenda 2063 on Education.

UNHCR. 2018. Comprehensive Refugee Response Framework (CRRF) Ethiopia; Brief Note.

UNHCR. 2018. Snapshot: Ethiopia's New Way of Working.

Annexes

Annex 1: Nine pledges Ethiopia made:

1. To expand the “out-of-camp” policy to benefit 10% of the current total refugee population.
2. To provide work permits to refugees and those with permanent residence ID.
3. To provide work permits to refugees in the areas permitted for foreign workers.
4. To increase enrolment of refugee children in preschool, primary, secondary and tertiary education, without discrimination and within available resources.
5. To make 10,000 hectares of irrigable land available, to enable 20,000 refugees and host community households (100,000 people) to grow crops.
6. To allow local integration for refugees who have lived in Ethiopia for over 20 years.
7. To work with industrial partners to build industrial parks to employ up to 100,000 individuals, with 30% of the jobs reserved for refugees.
8. To expand and enhance basic and essential social services for refugees.
9. To provide other benefits, such as issuance of birth certificates to refugee children born in Ethiopia, and the possibility of opening bank accounts and obtaining driving licenses.

Annex 2: Key Informant Interview, Discussion and Consultation Checklists

I) Guiding Semi-structures Interview Checklist for Federal IAs (ARRA & MoE)

A. Organization and Implementation structure related to environmental and social safeguards

1. Does your organization have prior experience working with any project/program supported the WBG? If yes, what is the name of the project? For how many years your organization has been implemented it? Do you know Bank’s social and environmental policies?
2. Does your organization have a department or any unit responsible for environmental and social management? If yes, what is the level of existing institutional capacity? Do you have the necessary resources committed for the department /unit (budget, qualified staffing, offices facilities, equipment and supplies etc)?

Probe: Does the organization have built sufficient in-house capacity? If not, what reliable alternative arrangements (e.g., coordination with other agencies, use of qualified consulting services) are available to promote effectiveness of the safeguard policies? If not, is there a need for supplementary support?

3. Does your organization have legal and regulatory frameworks in place for environmental and social management issues? If yes, what are these frameworks (collect hard or soft copy)?
4. As the proposed Program (GEQIP-E AF) will depend on inter-agency collaboration for delivery of services, what structural arrangements should be in place to ensure effective and timely coordination to address environmental and social issues?

Probe: Does a coordinating body need to be empowered to resolve coordination issues or delays in required actions? Does the Program consider activities and interests of other stakeholders that may affect environmental or social management?

5. Do you have policies and institutional frameworks in place to respond to the refugee educational needs and promote effective integration of the national education service delivery to the refugee communities?

Probe: Do services provide to in-camp schools and mainstream schools without any discrimination? Do these services access to all groups equally regardless of their background, including the vulnerable and marginalized groups (women, students with disabilities, disadvantaged socio-economic groups and lagging regions, and historically underserved peoples?

6. What is the existing level of institutional capacity and structure in order to scale up the Bank's support by providing quality education to refugees and host communities?

Probe: How committed are the institutions involved in delivering educational services to refugees and host communities, equitably? What factors hinder for the provision of equitable services to in camp schools as compared to schools in host communities? How these gaps can be narrowed?

7. How committed are the institutions involved to support the strategy of harmonizing and integrating refugee education into the mainstream national education management system?

B. Procedures and Processes of ESSA

1. Does your organization have the practice of screening environmental and social issues before implementing project/program activities?

Probe: *Is screening for, and estimation of, environmental and social effects a part of initial Program design? Does this screening process consider opportunities to enhance the range and reach of Program benefits?*

2. Is the scope of screening broad enough to cover all potentially significant environmental and social issues? Where relevant, are such concerns addressed in a manner consistent with commonly accepted good practice?
3. Does your organization have monitoring arrangements specifically include all relevant aspects of environmental and social management? Do screening and design processes yield appropriate information for establishing social and environmental reference points for performance comparison purposes?
4. Are there "adaptive management" practices in place to respond to unanticipated environmental or social management issues that may arise during project/program implementation?
5. Does your organization have accessible **grievance redress mechanisms**, with established procedures for submission of grievances? Do established grievance procedures accept and process grievances relating to environmental and social management issues? Are there established routines and standards for responding to grievances received?

C. Key social factors:

1. Are there vulnerable groups? groups (e.g., the poor, the disabled, children, the elderly, or religious or ethnic minorities to enjoy equitable education) What are the causes of vulnerability that hamper participation of socially marginalized or disadvantaged? Possible measures to mitigate the disparities in opportunity and access to educational benefits? Are steps already in place to ensure that these groups equally benefit from the program?
2. Do you think that the Program activities will create risks of, or exacerbating, **social conflict**?
3. What are the **potential adverse social impacts** associated to the proposed program activities that hinder the delivery of equitable education services to refugees and the host communities?

Probe: *In case such risks are anticipated, what systems exist for managing these (e.g. infrastructural improvements, translation/adaptation of educational materials, making sure textbooks do not contain discriminatory material, the prevention of ethnic conflicts?)*

4. Are there special need children in camps? What specific strategies are adopted to include **special needs** students living in the refugee camps and host communities?
5. Is there gender disparity in camp-based schools and host community schools? If yes, is this significant? What are the causes of **gender disparities** in the enrollment of students for refugee education as well as host communities?

Probes: *Do you have gender disaggregated data on the enrollment of students (from pre-school, primary school, secondary school,) in both refugee and host community's schools?*

6. What measures needs to be taken to **enhance access to benefits** by girls, students with disabilities, people with special needs and other vulnerable groups from both the refugees and host communities?

7. Is there gender based violence or sexual exploitation in schools and refugee camps? Is yes, who are the perpetrators? How do you rate the level of women and girl students' exposure to physical, sexual, and psychological violence and abuses in both schools for refugee and host communities?
Probe: *Do you receive cases reported in association with **GBV** or **sexual abuses**? Which form of **violence against women** is prevalent in the schools settings for refugees and host communities?*
8. What mitigation measures are in place or do you propose to alleviate all forms of violence against women and girls in school and camps?
9. Are there mechanisms at different levels to **manage grievances/complaints** arising from quality of service, program benefit sharing, GBV/sexual abuse and exploitation, etc?
10. Do you think that the program will be successful? If no, what do you recommend towards strengthening the existing approach to addressing **integration of education** for refugees and the host communities? Is there an incentive scheme/package to encourage or motivate staffs to serve in camp schools?
11. Do you have any additional comments or opinions that you want to add?

II) Key Informant Interview Guiding Questions for IAs (Woreda Administration and Education Offices)

1. What is your role regarding the administration and management of refugees?
2. Does the Woreda administration extends basic services such as education, health, water, etc to the refugees living in your area?
3. Have you ever accepted refugees in your office who require administrative support with different matters? If so, what are the services they required?
Probes: Services like birth certificate for their newly born children in Ethiopia, driving licenses, work permits, request for farmland and other requests to participate in labor market?
4. Did you experience any pressure due to the continual influx of refugees in the area? If so, what are the pressures caused by refugees in the Woreda?
5. Was there any conflict that happened between refugees and the host community?
Probes: If any conflict, what was the cause? Was it on the sharing of resources, access to basic services like schooling, or competition in the labor market, etc?
6. How was the conflict between refugees and host communities solved? Are there mechanisms/system in place to resolve any conflict between the refugees and host communities?
7. Compared with camp-based schools, how are the Woreda education office school services to the local communities?
Probe: building standard schools, class room number, qualified staffing, teaching materials, and other educational facilities and infrastructures?
8. What is the support your office obtains from ARRA, development partners, NGOs and other donors involved in supporting for refugee school?
9. Have you received any reported incidents of sexual harassment or gender-based violence in the relation between and among the refugees and host communities?
Probes: Do your office provide grievance redressing services which is easily accessible to students to lodge such cases and get speedy justice?
10. What efforts have exerted or being used by your office to harmonize the delivery of services in camp-schools with the national educational system service delivery?
Probes: harmonization of teachers' training? Provision of text-books and educational materials? Accreditation of refugee educational certification? National educational policies and strategies, including curriculum development? Teaching-learning evaluation and learning assessment against the national quality standards?

11. What do you think will be the barriers that hinder the integration of refugee education with the conventional /national education system?
Probe: Factors like social, cultural, religious, political, legal, economical and others.
12. What mechanisms need to be put in place to solve the barriers?
Probes: arranging any social events (sporting activities, etc)?
13. What did you do to make refugees feel at home getting rid of any psychological and emotional trauma, while the host communities accept refugees willingly sharing the available resources?
14. How do schools both in the refugee camps and host community discharge wastes associated with the water supply and sanitation?
Probes: Do all schools have well designed sewerage system or waste management plan? Do both the sewerage and water supply lines free from any leakage and contamination?
13. Do camp-schools and the conventional schools apply proper safety measures in the laboratories?
Probes: How safe the laboratories are operating? Do schools have incineration strategy for outdated laboratory items?
14. Do you have any comments or ideas you like to add on behalf of the local government, in order to improve the integration of refugees with the host communities?

III) Key Informant Interview Guiding Questions for ARAA Regional Branch Offices

15. What are services your organization for the refugees?
Probe: does your organization have adequate capacity and resources to fulfill the growing demands of refugees?
16. What is the role of regional ARRA branch office in refugee students' education?
17. Do all refugee children attend school? Does your organization have the required resource for refugee students? What are the materials your organization provides for student? is it enough?
18. Compared with the host community, do you think that the refugees have better school environment like student classroom ration, chairs and tables, textbooks, reference books, number of teachers, health and sanitation in school, etc
19. To what extent your office integrate with development partners, NGOs and other donors involved in supporting for the effective delivery of refugee school programs?
20. Have you received any reported incidents of sexual harassment or gender-based violence in the school or camps? Were there incidents of sexual harassment relation between and among the refugees and host communities?
Probes: Do your office provide grievance redressing services which is easily accessible by both refugees and the host communities to lodge such cases and get timely justice?
21. What efforts have exerted or being used by your office to harmonize the delivery of services in camp-schools with the national educational system service delivery?
Probes: harmonization of teachers' training? Provision of text-books and educational materials? Accreditation of refugee educational certification? National educational policies and strategies, including curriculum development? Teaching-learning evaluation and learning assessment?
22. What do you think will be the barriers that hinder the integration of refugee education with the conventional /national education system?
Probe: Factors like social, cultural, religious, political, legal, economical and others.
23. What mechanisms need to be put in place to solve the barriers?
Probes: arranging any social events (sporting activities, etc)?
24. What did you do to make refugees feel at home getting rid of any psychological and emotional trauma, while the host communities accept refugees willingly sharing the available resources?

25. How do schools both in the refugee camps and host community discharge wastes associated with the water supply and sanitation?

Probes: Do all schools have well designed sewerage system or waste management plan? Do both the sewerage and water supply lines free from any leakage and contamination?

26. Do camp-schools and the conventional schools apply proper safety measures in the laboratories?

Probes: How safe the laboratories are operating? Do schools have incineration strategy for outdated laboratory items?

27. Do you have any comments you like to add in order to improve the integration of refugees with the host communities?

IV) Key Informant Interview Guiding Questions for School Directors, Teachers, and Students

1. How many refugee or host community students are attending in this school?

2. When do they start to attend education together?

3. How is the standard of the education service delivery?

Probe: building standard, class room number and size, qualified staffing, teaching materials, and other educational facilities and infrastructures?

4. How was the relationship between the children's/ students of refugees and host communities?

Was there any conflict that happened between refugees and the host community?

Probes: If any conflict, what was the cause? Was it on the sharing of resources, access to basic services like schooling, or competition in the labor market, etc? How was the conflict solved? Is there mechanisms/system in place to resolve any conflict between the refugees and host communities?

5. Is there gender based violence or sexual exploitation in schools and refugee camps? Is yes, who are the perpetrators? How do you rate the level of women and girl students' exposure to physical, sexual, and psychological violence and abuses in both schools for refugee and host communities?

Probe: Do you receive cases reported in association with GBV or sexual abuses? Which form of violence against girls is prevalent in the schools settings for refugees and host communities?

6. What efforts need to be exerted to harmonize the delivery of services in camp-schools with the national educational system service delivery?

Probes: harmonization of teachers' training? provision of text-books and educational materials? accreditation of refugee educational certification? national educational policies and strategies, including curriculum development? teaching-learning evaluation and learning assessment?

7. What do you think will be the barriers that hinder the integration of refugee education with the conventional /national education system?

Probe: Factors like social, cultural, religious, political, legal, economical and others.

8. What mechanisms need to be put in place to solve the barriers?

V) Key Informant Interview Guiding Questions for Refugee and Host Community Key Informants

A. Questions for Refugee Key Informants

1. How impacted are you and your family due to the displacement from your country of origin?

Probe: Do you experience any social, psychic and emotional impacts of displacement?

2. Are there social service giving infrastructures such as schools, water points, sanitation centers, health centers, marketing spots, etc. in refugee camps and in the area?

Probe: If so, are they adequate enough to you? How was their status (sustainability, quality, accessibility, affordability, fairness, etc.)?

3. Do host communities share with you the available social infrastructures available in the camp or outside the camp without any discrimination?
4. Are there NGOs or private organization operating groups in this area? If so, what are they? What services do you get from them? Do these services shared to all of the residents equally?
5. Are there specific vulnerable groups (minorities, women, FHHs, etc) in the camp? Do they have equal access to basic services /facilities in the camp? If no, how they should be treated? What do think should be done for them to enable them share project benefits?
6. **Social cohesion and social conflict:** How is your relation with the refugees and host communities? Are there any open conflicts among the Refugees and between the Refugees and local communities?

Probe: If any, what do you think are the causes for these conflicts? How was the conflict redressed? Do they have traditional ways of conflict resolution? If so, how it operates?

7. How easy or difficult it is to access educational services to you or your children? What makes it easy/difficult?

Probe: How do you get to educational services? Do you require transport? What do you need in order to get access to these services?

8. What are the things required to make easy access to education services?

Probes: What prevents you from being involved in camp and outside camp schools, participate in various school clubs or other extracurricular activities?

9. Have you ever observed any act of **sexual abuse/gender based violence/any form of violence against women** in the camp or schools in the camp?

Probe: who are the survivors (age, ethnic group, education level, etc)? who are the perpetrators? When and how is the act committed? Are survivors aware of their rights to get protected from all forms of violation or discriminations? Are there responsible bodies to receive and redress reports related to violence (functionality, accessibility, affordability, fairness and effectiveness?

10. Have you ever observed any act of child labor exploitation/ abuse or child trafficking in the camp or in the host community?

Probe: If so, who are the perpetrators? When and how is the act committed? Are there exist NGOs or civic societies that advocate child rights and raise awareness to refugee communities and families about child rights protection?

11. Have you noticed any behavior or act of students in relation to drug or abusive substance use among the students and the refugee community?

12. How do you think that all the refugee members participate in the Program design and implementation? Do men and women equal saying and discuss together?

13. How best be the refugee community could be managed to be involved in the **monitoring and evaluation** of the Program?

14. Have you ever come across any type of discrimination against the refugee by the local people?

Probe: What are the bases for discrimination? Is that due to your religion practices, language difference, or cultural differences or what?

15. Have you ever experienced/observed violence based on gender, physical abuses or other forms of violence in schools?

Probe: If yes, what type of violence (physical, sexual, psychological and economic)? Is there a responsible body where the survivor can lodge grievances related to such violence acts?

16. What do you recommend to be done to enhance the relation and integration of refugees and host community?

17. Are there any other comments you would like to add about the overall integration of refugee education in the camp schools with the national education system?

B. Questions for Host Community Key Informants

1. When do the refugees come here? How do you find their presence in the area? Do you see them as a threat or opportunity?
2. How is your relationship with the refugees? How is the relationship of your community members with the refugees? Do you have any interaction or close contacts with the Refugees? Is there intermarriage relationship with the Refugees?
3. What is your attitude towards the Refugees? Is negative why? Is this with regard to their differential language, religious and cultural practices?
4. What is the refugees' attitude towards the local communities? Is negative, what is the reason? Is this due to language, religious and cultural difference or any other reason?
5. What are the social service giving infrastructures in your area? (Schools, water points, health centers, marketing centers, etc?)

Probe: If so, are they adequate enough? How was their status (sustainability, quality, accessibility, affordability, fairness, etc.)? Do the refugee share or use these social service infrastructures with the local community? If no, what is the reason?

6. Have you share or use the services from refugee camps? If so, what are these benefits or services you get or share?
7. Do your kids or community children attend school with refugee children? If no, what are the reasons? Do think that refugee and host community children can attend schools together if allowed? If no, what are the reasons? What should be done to enable refugee and host community children to attend school together?
8. Did the refugees have brought any pressure on you? (on the land, social services, job opportunities, etc)

Probe: Did you face land scarcity or social service deterioration due to the arrival of the Refugees? How and why?

9. Are there specific vulnerable groups (minorities, women, FHHs, etc) in your community? What is their relation to the host and refugee communities? Do they have equal access to basic services with other community members? Do you think that they will benefit as equal as other on the project? If no, how they should be treated?
10. How do you compare the situation in terms of social service deliver in the area before and after the coming of the Refugees?
11. If the proposed project requires some land for subproject activity implementation, how would it acquire? Do you think that community members could voluntarily donate? If so, what procedures would be followed to ensure voluntary donation by landholders?
12. Are there physical cultural resources in the community? If so,
 - i. The name, type, age, ownership, short description of the cultural resource, etc.
 - ii. What is the nature and extent of potential impacts on these resources (this should include locally recognized sacred and religious place.
 - iii. How will it be monitored, and managed? What activities need to done to protect the cultural heritages?
13. Are there any open conflicts between the local population and the Refugees in the area? If any, what do you think are the causes for the conflicts? Does the community use traditional conflict management mechanism to resolve any conflicting situation that may arise between and among the refugees and the host community?

14. Have you ever observed any act of **sexual abuse/gender based violence**/any form of **violence against women** in the community or schools?

Probe: who are the survivors (age, ethnic group, education level, etc)? Who are the perpetrators? When and how is the act committed? Are survivors aware of their rights to get protected from all forms of violation or discriminations? Are there responsible bodies to receive and redress reports related to violence (functionality, accessibility, affordability, fairness and effectiveness)?

18. Have you ever observed any act of child labor exploitation/abuse or child trafficking in the camp or in the host community?

Probe: If so, who are the perpetrators? When and how is the act committed? Are there exist NGOs or civic societies that advocate child rights and raise awareness to refugee communities and families about child rights protection?

19. Have you noticed any behavior or act of students in relation to drug abusive or substance use among the students and the community?

15. How do you think that all community members participate in the Program design and implementation? Do men and women equal saying and discuss together?

16. How best be the host community could be managed to be involved in the **monitoring** and **evaluation**?

17. What do you recommend to be done to enhance the relation and integration of refugees and host community?

18. Are there any other comments you would like to add about the overall integration of refugee education in the camp schools with the national education system?

Annex 3: Sample GEQIP-E ESSA Stakeholders Consultation Participants' Photo



Annex 4: List of Consulted Persons for Data Collection

A. Participants at Federal Level (MoE and ARRA)

**GEQIP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Date: *04/02/2019 - eds/els* Attendance Sheet *ARRA Head Office & MoE*

No	Name	Position/Organization	Responsibility	Phone Number	Signature
1	<i>Mahmoud Deyou</i>	<i>ARRA</i>	<i>Program Head</i>	<i>094 14 17 66</i>	<i>[Signature]</i>
2	<i>Askenafi Demelto</i>	<i>ARRA</i>	<i>Program Implementation</i>	<i>0912994692</i>	<i>[Signature]</i>
3	<i>Albera Hiluway Faw</i>	<i>ARRA</i>	<i>Project M&E and Evaluation</i>	<i>0913992399</i>	<i>[Signature]</i>
4	<i>Berhanu Araya</i>	<i>MoE-Counselor</i>	<i>St. Expert</i>	<i>0911898261</i>	<i>[Signature]</i>
5	<i>Abenayegabai hulkirias</i>	<i>MoE-SARIE</i>	<i>Team Leader</i>	<i>0911360309</i>	<i>[Signature]</i>
6	<i>Berhan Haala</i>	<i>MoE/RCO</i>	<i>RCO</i>	<i>0961642121</i>	<i>[Signature]</i>
7	<i>Tamirat Faysa</i>	<i>MoE</i>	<i>"</i>	<i>0911025230</i>	<i>[Signature]</i>
8	<i>Hadiya Chanyay</i>	<i>MoE/PCO</i>	<i>"</i>	<i>0911228157</i>	<i>[Signature]</i>
9					
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B. Participants in Afar

GEQIP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process

Attendance Sheet

Date: 31/12/2018

AFAR-BERAHLE

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Meseroratu Gishabane	ABBA	Camp Coordinator	0913160843	
2	Fitum Mengata	ABBA	Program Officer	0920543820	
3	Yohannnes Ebrahira	AREP	Protection officer	0920103211	
4	Ghedeina Gishassie	ABBA	Teacher	0924289145	
5	Giber Yitamu	ABBA	Teacher	0934280460	
6	Zewedu Woldehaiman	ABBA	Director	0938910308	
7	Alwasak Bata	OSD	P. coordinator	0914285487	
8	Birkant Yimer	Education office	report	0813059477	
9	Daata Satek	Education office	inspector	0912909477	
10	Ferkant Kebede	Media Edu. office	Trng	0929610159	
11	Ahmed Assen	21 22 23	Coord. Proc. cumm	0913363222	
12					
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**GEIIP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Date: 01/01/2019

Attendance Sheet

Bereale Community (Host)

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Zacharie NAYI	NCVIA TDR			Aus
2	Odouard NAYI	NCVIA TDR			Odouard
3	Odouard NAYI	NCVIA TDR			NAYI
4	Odouard NAYI	NCVIA TDR			NAYI
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**GEOP-F Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet

Date: 01/01/2019

BERAHLE

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Sulemana Ati	MBerhale Camp	Relaxa Centre Committee (Rec)	09148472855	
2	Shirif Madderin	"	"	092422007	
3	Hussien Hadyegam	"	Rec	0953178411	
4	Abdulahmanmushm	"	Rec	-	
5	Daya Alkefar M	"	Rec	095011159	
6	Amina F Sha F	"	"	-	
7	Yysha Eteme F	"	"	-	
8	Yysha Eteme F	"	"	-	
9	Yysha Eteme F	"	"	-	
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C. Participants in Gambella

**GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Date: 10 January 2019 - 11/01/2019

Attendance Sheet

Gambella, Tawi & Itang

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Megere Derba	ARPA Gambella	Regional Coordinator	0964992338	
2	Yohannes Barasa	ARPA	Coord officer	0913428028	
3	Desinet Daniel	ARRA	Environment officer	0922478906	
4	Shebe Bekamu	ARPA	Protection	0913628136	
5	Maber Klor	REB Gambella	Head	0125234211	
6	Chola Ayek	REB	Plan head	0913078822	
7	Lucasid Yedia	REB	Plan head	0911485619	
8	Beid Gab	KECB Gambella	Directorate	0911383496	
9	Tariku Teshome	GLWLE office	Plan head	0917834999	
10	Uluyin Aman	GLWLE office	Office head	0916130162	
11	Bealio Yhames	ARPA Tawi	School Director	0910948682	
12	Gatisech Ker	Educational Affairs	Office head	09173, 2484	
13	Chor Okello	Agri/FAO/ARSP	TR DTR coord	0904471906	
14	AGIRA OBAULT	Educative Plan program	Plan head	0917482438	
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GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process
Attendance Sheet

Date: 12/01/2019

Tevi Refugee Camp / Gambella

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	KOAND KORYOM	RCC	Chairman	0996022532	
2	Gabriel Bietong	RCC	DEPUTY	09745654124	
3	Peter Paw caafin	RCC	Secretary	0969683342	
4	BOI GATWED DUDON	RCC	Food/Supplier	0953674654	
5	Nyadens Jock	W/A Member	Member	098851899	
6	Nyadwed Pueli	Community	Member	092259812	
7	Nyabotk Tiedh	RCC	Member	0904129924	
8	Gadgon Gaddin	RCC	Health SWASH	0988552018	
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**GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process
Attendance Sheet**

Date: 12/01/2019

Gambella Town Host Community

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Alaya Lero	Jawi	Advocate		
2	Ojulu Okide	"	"	0901284434	
3	Abella Hetta	Jawi	"		
4	Abey Abaku	"	"		
5	Abey Ayago Okal	"	"		
6	Akie Chew	"	Resident		
7	Abalu Onud	"	"	0947824387	
8	Okoro Enud	"	"	0965825735	
9	Ajide Aweta	"	Resident		
10	Osak Ojulu	"	"		
11	Osalu Okoro	"	"		
12	Obang Okal	"	"	0912122814	
13	Oyewayo Chew	"	"		
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**GEIPE Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet

Date: 14/01/2019

Tang Host Community

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Sally J. MORTON	h & p dental	SPCL	0912225034	
2	W L Koo	TRP	TRP	0917834670	
3	KOD JCS	"	"	0935133428	
4	King Lam	"	"	0906907100	
5	TSI TSI	"	"	0916130412	
6	Tom Tang	"	"	0969553150	
7	JJ JC	TRP	"	0917216897	
8	PC Wong	TRP	"		
9	PPPA PJ	"	"	0917488006	
10	CCCP CC	"	"	0938853888	
11	YS P. G. S.	"	"	0949011858	
12	Wong W	"	"		
13	PPPA PJ				
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**GEOIP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet

Date: 14/01/2019

I Tang Primary School

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	GRACH CHUOL LUTH	I Tang 16/2 primary	Director	0932483029	<i>[Signature]</i>
2	ATUWOK DONOLO	School	Teacher	0917994188	<i>[Signature]</i>
3	GALE RAI PAH	>>	Teacher	0945653608	<i>[Signature]</i>
4	TARDU-DETALESA	>>	Teacher	0932482034	<i>[Signature]</i>
5	BIRHANY WIDANA	>>	Teacher	0942343932	<i>[Signature]</i>
6	IKANENDI SIMPUSOH	>>	>>	0967091398	
7	MUJU YOHANES	>>	77	0912843930	<i>[Signature]</i>
8	ESATAKE TERFERA	>>	>>	0917318124	<i>[Signature]</i>
9	YISELAKE-BUCKA	>>	>>	0928884878	<i>[Signature]</i>
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D. Participants in Tigray

GEQIP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process
Attendance Sheet

Date: 02/09/2019 Tigray Regional Afar Regional

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Berke Eskela	TEPLAKA	Key Lead	034441560 berkeeskela@gmail.com	
2					
3	Balata Weljicaw	TPEB	D. B. Head	0914300527	
4	Meryem Jaqo	APRA	Program	091004969	
5	Sakawde Basaw	APRA	Program	09117204720	
6	Mohammed Kamil	AFAR	AFAR	0915084683	
7	Abdulkadir Mohamed	AFAR	AFAR	0935212066	
8	Mohamed Hussein	AFAR	AFAR	0961881242	
9	Taha Ahmad	AFAR	AFAR	0911815245	
10	Habib Mohamed	AFAR	AFAR		
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Date: 28/12/18

GEOP-F Additional Finance ESSA Update
 Stakeholder and Community Engagement/Consultation Process

Attendance Sheet

Hiwotba and Shimelba Refugee Camp

No	Name	Institution/Organization	Responsibility	Telephone/Mobile/land	Signature
1	Hadish Abraham	RCC	Health Secretary	09 4850 0063	
2	Medisa Abjaha	RCC	SHO & head	09 5351 4969	
3	Yosief Gyara	RCC	Chair man	09 145165 93	
4	Dergis mantay	RCC	Chairman	09 12 88222	
5	Tadesse Zeneber	RCC	Secretary	09 4850 6324	
6	Kele FOSHO	RCC	VP	09 3700 5648	
7	Munjab Ayekale	RCC	Vice chair person	09 5353 5042	
8	Mengstlech Erknessant	RCC	Pract. Executive	09 2419 3362	
9	Somere Kaddayochiel	RCC	-	09 4265 3859	
10	Abraham Tesfay	RCC	Chair person	09 194505 08	
11	Tesfu. Brianwa	RCC	-	09 4262 3698	
12	Medhawi KFIQ	-	-	-	
13	Mager Givwoy	-	-	09 4850 2665	
14	Takle Tesfanduel	RCC	-	09 4507 6449	
15	Alkamu Getachew	RCC	-	-	
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Skimelba & Hitesats Refugee Camps

GEQIP-E Additional Finance ESSA Update Stakeholder and Community Engagement/Consultation Process

Attendance Sheet

Asgele Tesemla & Tatyay Adyabo Wore

Date: 23/12/2018 - 30/12/2018

No	Name	Institution/Organization	Responsibility	Telephone/Mobilemail	Signature
1	Klentien Skistman	AREA Shire	Finance Specialist	0910193493	
2	Efrem Ayfer	ARRA Shire	Education Officer	09155719966/hayfer@arran141@gmail.com	
3	Assefa Mekeemem	ARRA Shire	head officer	09218383728	
4	Tesfayon Tesfay	ARRA Shire	social worker	0814780947	
5	Tsegay Beyene	ARRA Shire	social worker	0914781616	
6	lipalem loben	ARRA Shire	education officer	0920533395	
7	ellwudet Hailu	ARRA Shire	education officer	0914781617	
8	Gostam Barhan	ARRA Shire	protection	0912298804	
9	Tsewot Tsewot	ARRA Shire	education officer	0914781612	
10	Maklem. Maklem	ARRA Shire	teacher	0914781665	
11	Mekraem Abit	ARRA Shire	education officer	0914784039	
12	Yemane Bishane	ARRA Shire	education officer	09088816968	
13	Fitsum G/M	ARRA Shire	education officer	0910996081	
14	Kach Mesmasse	ARRA Shire	education officer	0920186028	
15	Mheresa Yaha	ARRA Shire	education officer	0931743190	
16				0910010222	

17. Tsefayon Negu Asst. program officer (ARRA)

E. Participants in Somali

**GEIP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet

Date: 23/01/19 Somali-Region Jigjiga

No	Name	Institution/Organization	Responsibility	Telephone/Mob/Email	Signature
1	Muhammad Jilal	AREA DISTRICTA	Zone Coord	muhammad.jilal@yaleu.com	
2	Muhammad Nur	RESD/Environmental	Coordinator	0911977395	
3	Muhammad Adam	REB	GEIP-E	0915217819	
4	Muhammad Adnan	environmental (private)	Bureau head	0921555780	
5	Muhammad Adnan	Environment/Forestry	Forest Director	0915744572	
6	Muhammad Adnan	Education office	Head office	0915044103	
7	Muhammad Omar	WED	Superior	0915208202	
8	Muhammad Ali	WED Ashara	Expert	0915222714	
9	Fanhan Mohamed	WED Ashara	Expert	09168853639	
10	Ali Farhan Rose	WED Ashara	Expert	0915044442	
11	Tesfay Maham	Ashara baysa shari	Vice Director	0922918257	
12	Muhammad Jilal	Area Ashara	Coordinator	0911592542	
13	Muhammad Adnan	Area Ashara	Head coordinator	0919035154	
14	Muhammad Adnan	ARBA Kharsh	Protection	0911987504	
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GEVIF-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process

Attendance Sheet

Date: 24/01/2019
Samal Region: Awebarre Refugee Camp
RCC

No	Name	Institution/Organization	Responsibility	Telephone/mobile	Signature
1	Abdirizak Mohamed Uthman	Refugee Control Comm	Chair lady RRC	0982310712	[Signature]
2	Abol Mohamed Samatar	RRC	Vice Chair - RRC	09335543779	[Signature]
3	Hassan Abdi Adelle	RRC	Secretary	0989370963	[Signature]
4	Mohamed Ali Yusuf	RRC	RRC Member	0935717839	[Signature]
5	Samir Allahman Ali	RRC	RRC Member	0927354986	[Signature]
6	Haris Umar Abdi	RRC	''	0966673670	[Signature]
7	Rukyas Hassan Adilaw	RRC	''	0931301646	[Signature]
8	Estimo Ateu Abasaw	RRC	''	0925293134	[Signature]
9	Yahye Mohamed Akeir	RRC	''	0933214544	[Signature]
10	Taka Abdullahi Ali	Morasa Acs		0932838035	[Signature]
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**GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet

Date: 24/10/2019

Ethio-Somali Region

Awdare Host Community

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Nuru Nour	Aw-dare of Baldare	Kebele Chairman	0906825316	
2	Abdi Barqa	Aw-dare of Baldare	Public Relation	0923 9071	
3	Basir Nour Saad	Awdare of Baldare			
4	Aden Ali Hadi	Awdare of Baldare			
5	Mohammed Ali Kamil	"			
6	Bale Mohammed	"			
7	Aden Hamud Mikid	"			
8	Aras Akis	"			
9	Ali Muste Abaw	"			
10	Abdi Mohammed	"			
11	Mohammed Hassan Higo	"			
12	Muhter Ahmed	"			
13	Mariam Ahmed Amin	"			
14	Hadiya Nur Dida	"			
15	Yusef Deleger	"			
16	Dayle Mohamed	"			

**GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet *Semaki Region* *Kebitbangk Host Community*

Date: *25/01/2019*

No.	Name	Institution/Organization	Responsibility	Telephone/Mobile	Signature
1	<i>Nim Cahya</i>	<i>Education</i>	<i>Deputy</i>	<i>0815394189</i>	<i>[Signature]</i>
2	<i>Kedjarada</i>	<i>Education</i>	<i>Deputy</i>	<i>0815394189</i>	<i>[Signature]</i>
3	<i>Muhammad</i>	<i>PROTB</i>	<i>Finance</i>	<i>0913123515</i>	<i>[Signature]</i>
4	<i>Chairman</i>	<i>Karakalle</i>		<i>0911089448</i>	<i>[Signature]</i>
5	<i>Aden</i>	<i>Community</i>			<i>[Signature]</i>
6	<i>Aden</i>				<i>[Signature]</i>
7	<i>Aden</i>				<i>[Signature]</i>
8	<i>Fadli</i>				<i>[Signature]</i>
9	<i>Yasan</i>				<i>[Signature]</i>
10	<i>Yasan</i>				<i>[Signature]</i>
11	<i>Fadli</i>				<i>[Signature]</i>
12	<i>Fadli</i>				<i>[Signature]</i>
13	<i>Sals</i>				<i>[Signature]</i>
14	<i>Adi</i>				<i>[Signature]</i>
15	<i>Makam</i>				<i>[Signature]</i>
16	<i>Khadia</i>				<i>[Signature]</i>

**GEIPE Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Date: *25/01/2019* Kebriberah Camp PCC meeting

No	Name	Institution/Organization	Responsibility	Telephone(Mob/Email)	Signature
1	mo hamed Hassan	PCC	Chairman	0911985177	<i>[Signature]</i>
2	Abdelmoneem Ahmed	"	Member	0915784317	<i>[Signature]</i>
3	Sahar eld Ahmed	"	Member	0915105395	<i>[Signature]</i>
4	Dhurh Hassan Ali	"	"	0931507211	<i>[Signature]</i>
5	Heebe bechuruel	"	"	09 Mo Phone	<i>[Signature]</i>
6	KedITA Abdu	"	"	0937467753	<i>[Signature]</i>
7	Aspha Mohamed Elwan	"	"	0913832458	<i>[Signature]</i>
8	Nizam Mohamed	"	"	0939183657	<i>[Signature]</i>
9	Tinaw Mohamed	"	"	0968814234	<i>[Signature]</i>
10	Fadwan Amir	"	"	Mo Phone	<i>[Signature]</i>
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F. Participants in Benishangul-Gumuz

GEIIP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process

Date: 16/09/2019
Benishangul-Gumuz - Assosa

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Asteremariam Belay	AKRA Assosa	MP & ODP	09153 81834	
2	Zelachgn Endare	AKRA Assosa	Educator	0926569199	
3	Egziye Berhane	GDOP Woreda	Comm. Director	0911 91 3470	
4	Mahmod Albedil	Environment office	office lead	091122428	
5	Telal Ibrahim	Education House	Expert	090317070	
6	Jemal Endari	Education	Expert	090309970	
7	Desalegn Tinasu	Education	Phd student	09171158245	
8	Alem Abebe	Education	Expert	0911189300	
9	Belay Adhisu	EFLAC/Homsa	Expert	0920460550	
10	Biruk Kebede	AKRA Assosa	Program	09153 1308	
11	Assefaw Alem	AKRA Assosa	Coordinator	09153 1308	
12	Feyselem Ganie Alem	DICAC/RKD	Director	0916069109	
13	Tamara Kuroi	Education Bureau	Bureau head	0912004392	
14	Abelchewmariam Alem	Education Bureau	Director	0920264925	
15	Abdulkadirin Sada	BOELI	Nice & G. team	09132 47324	
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**GEIOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet

Sherkole Refugee Camp

Date: 12/01/2019

No	Name	Institution/Organization	Responsibility	Telephone(Mob)/email	Signature
1	Gabriel Meik	RCC Sherkole camp	Chairperson	0939348953	
2	Abraham Nsr Atengom	Head of Zone leader	Zone leader	09673941226	
3	Abraham Abol P. eeg	RCC Sherkole camp	Administrative officer	0911231920	
4	MAMISO Babukim	RCC Sherkole camp	Block chief	0989448796	
5	NIKIRIHO FIDELE	RCC Sherkole camp	Block chief	0975262649	
6	PHILIP BAKOMEZA	Zone leader/HR	Zone C	0915921438	
7	SAMIRAH AYHIRA	W. HR	W. ASS	0949482865	
8	SYLWE T. HILONTA	W. ASS	Zone G	0973992393	
9	Samuel Akat	Z. leader	Zone F	097224900	
10	Odette Muriyga	W. Ass. Sherkole Camp	Secretary	0005603826	
11	Olivia JUSTIN	RCC	Fg	0989485690	
12	SAKIWA-OLIVE	W. A	ZONE G	0937999412	
13	HUSSEN Babekir	RCC	F1	0962826654	
14	MARITHE AYODIA	W. ASS	F	0935296347	
15	ALIVIA	W. ASS	B		
16	KARIBALLE TIVATUA	RCC Sherkole	CA	0922229848	

7 AYAR AJITH RCC Sherkole F 0932946404
 18 - Ambassador Mohamed RCC Sherkole F 0933393483

**GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet

Date: 12/01/2019

Host Community: Kimb Hamza Kehole - SherKole

No	Name	Institution/Organization	Community Responsibility	Telephone/Mob/Email	Signature
1	Selenidin Henry	RCE SherKole camp	Members	0947836075	[Signature]
2	Alhadi Reyib	SherKole Kehole	Resident	0942086306	[Signature]
3	Mohamed Nur	SherKole Kehole	>>	-	[Signature]
4	Alaught Eitel	>>	>>	0943284910	[Signature]
5	Ahmed Kelifa	>>	>>	09403015806	[Signature]
6	Tobaku Muhayida	SherKole Kehole	Resident	0989945252	[Signature]
7	Yasaw Yirawaa	>>	>>	-	[Signature]
8	Bakrit Atas	>>	>>	-	[Signature]
9	Asif Aifa	>>	>>	-	[Signature]
10	Mohammed Mustafa	>>	>>	090134035	[Signature]
11	Alvas Alkid	>>	>>	-	[Signature]
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**GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Date: 04/02/2019 - as held **Attendance Sheet** **Consentation in ARA Head office & MOE**

No	Name	Institution/Organization	Responsibility	Telephone/Email	Signature
1	Melrose Davies	ASSA	Program Head	0944 9411 66	
2	Ashrafat Basheke	AFPA	Program Implementation	0912394632	
3	Ahona Haimu Far	AFPA	Project M&E Officer/Head	0913900070	
4	Berhanu Archay	MOE-COASAC	S-Support	0911828361	
5	Ademayehu Wolketes	MOE-SME	Team Leader	09113602309	
6	Berhanu Hailu	MOE/PCO	PCO	0961642121	
7	Tamrat Tayen	MOE	"	0911025230	
8	Haddise/Hengay	MOE/PCO	"	0911228157	
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**GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Date: 18/01/2019

Attendance Sheet - Bambasi Wondolamba Lomaha Camp

No	Name	Institution/Organization	Responsibility	Telephone/Mobile/Email	Signature
1	Aiwadi Mertani	Wondolamba	Lead office	0912900099	
2	Pirwaning Jekson	WDDIP	Coordinator	09118900321	
3	Bambasi Dendib	Bambasi Milliteria Land Use	0919171633		
4	Heseg Bekele	Kantor wilayah ofra	planner	0990085993	
5	Godna Amawari	Rivulet's office	curriculum	0919053413	
6	Harnid Redwan	Wondolamba export	Justin export	0918080480	
7	Aisyah Reha	Wondolamba	supervisor	0960867816	
8	Meskeron Angari	ARRA Muehal	HR	0911303085	
9	Tilahun Gusae	ARRA	acting program	0917856989	
10	Xepinet Girma	ARRA	S/Principal	0913999412	
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**GEOP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Attendance Sheet

Date: 18/01/2019

Rambasi Wamba Camp

No	Name	Institution/Organization	Responsibility	Telephone/Job/Email	Signature
1	E Sam Seliman	Rambasi Camp	Recoraman	0505202145	
2	Atsani Aralan	Rambasi Camp	Recoraman	0965681378	
3	Etjarmam Rebat	Rambasi Camp	Rec	0945340935	
4	Abdolahiz Zambhi	Rambasi Camp	Rec	0970449164	
5	Ahmad Nassari	Rambasi Camp	Rec	0165440983	
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**GEQIP-E Additional Finance ESSA Update
Stakeholder and Community Engagement/Consultation Process**

Date: 18/01/2019

Responsible Attendance Sheet

Wamba Host Community

No	Name	Institution/Organization	Responsibility	Telephone/Email	Signature
1	ALY KALUS	WOMPA	MEMBER	0928588829	<i>[Signature]</i>
2	SELEMON IYOHAN	SS			
3	AGNABDY WAZLA	SS		098741646294	<i>[Signature]</i>
4	BEAYK WAZLA	SS			<i>[Signature]</i>
5	KALLA AJOAT	SS			<i>[Signature]</i>
6	ALANOTOP BARRET				<i>[Signature]</i>
7	MESA JAMA				<i>[Signature]</i>
8	JIMO BERTER				<i>[Signature]</i>
9	ABUHAN IYOHAN				<i>[Signature]</i>
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Annex 5: ESSA Consultation Summary Note

The consultation on the ESSA was conducted at Magnolia Hotel, Addis Ababa, Ethiopia on April 02, 2019. The consultation participants were from the federal implementing agencies (ARRA and MoE) and five refugee hosting regions of Ethiopia. They were drawn from federal ARRA, ARRA zonal branch offices, MoE, RBEs, WEOs, host communities, and other stakeholders namely EOC-DICAC, UNHCR, UNICEF, and RaDO. A total of 31 people (29 male and 2 Female) took part in the consultation.

Ato Jacob Wondimu, World Bank Senior Environmental Specialist led the consultation workshop introducing the agenda of the day. He invited Simon Sottas, World Bank Social Development Specialist to make a welcoming and opening speech. In his speech, Simon emphasized that the World Bank is committed to ensure environmental and social sustainability of its programs and projects. He further noted that World Bank, besides the current AF program, has other programs like DRDIP and EOP that has been implemented to support the refugee and host communities in Ethiopia.

In addition, he stressed that the aim of the workshop is to get feedback and inputs from the participants on the ESSA, that will be used to further improve the ESSA, particularly the environmental and social risks of the proposed program. He encouraged participants to raise any concerns and questions they have on the ESSA. He said the team will respond the questions which are within the scope of the World Bank team in the consultation, and those questions beyond the mandate of the team will be presented to the task team. He requested active participation and a fruitful day for the participants.

Following Simon's speech, the participants have made self-introduction. They introduced their names, the region where came, and their duties and responsibilities in their organization.

Sophie Lashford, GEQIP-E AF team member, presented the AF program objective and its components. Sophie stressed that GEQIP-E AF aims to improve internal efficiency, equitable access, and quality in general education. Sophie presented the AF PforR components (Part 1: Harmonization of services at refugee primary schools; Part 2: Integration of refugee secondary education schools) and the IPF components (Part 1: Innovation to address key challenges in refugee education; and Part 2: Enhanced capacity for harmonization and integration). Sophie delivered a detailed presentation on each of these components.

Following Sophie's presentation, there was a question and answer session. The discussion was a varied one, given that many participants came from different departments to those previously consulted with (given their social and environment expertise).

Questions covered the change is mandate for both ARRA and NGOs, why this was pursued and its impact. The team pointed to the Government of Ethiopia's international and domestic commitments and changing policy on refugees and the consecutive consultative meetings that the AF team held during subsequent missions with ARRA and other stakeholders. There was some clarification that only secondary schools are to be transferred under the program design.

There were a series of questions on the logistics and content of the program, such as the management of school grants, which the team indicated is expected to be handled by the Government through the

MoU to be signed by MoE and ARRA. It was noted that construction is essential, although this is not supported by the AF and beyond the AF program boundary. Participants urged the expansion of the inclusion of special needs children in the program.

After the question and answer session, Moges Woyessa, social development consultant, presented World Bank PforR Programs Financing Policy and the ESSA Process, followed by the Key ESSA Findings. Consecutively, Zereu Gerday, environmental consultant, presented the Program Action Plan (PAP) of the ESSA.

Discussion with participants followed on the future prospects of refugees and its implication for curriculum, to which an MoE participant was able to outline the policy and reasoning for using national curriculum, agreed on by IGAD and the Djibouti Declaration. There was also some concern over how catch up classes, currently available for students who arrive part way through a school year or after a break, might work under a changed system.

With regards to the high-risk rating, the team outlined some of the pilot activities in the program design and the specific risks they would target. There was an extended back and forth on the risk rating for SGBV, with specialist protection and gender participants (from government and civil society) countering some participant suggestions that the risk should be downgraded in the ESSA. This was echoed by the team, who pointed to global and national evidence that contextualizes the lack of reporting at camp level. Global literature shows that because of the fear from survivors and also confidentiality issues, most GBV cases are not reported. A code of conduct for teachers on SGBV was suggested by participants.

The data in the previous draft of the ESSA on unaccompanied and separated children was pointed out as out of date and further details were offered via email. In terms of early marriage, it was urged that community mobilization and dialogue be included as well as a facilities-based approach (as per the previous draft). In terms of IERCs, it was encouraged that access to mainstream IERCs should be maximized, rather than refugee-specific ones being built. Teacher training and classroom support for special needs students was also seen as an effective method.

There was some discussion about the findings of the ESSA that schools closed for ration distribution and whether that was the same in each region and how that might be solved in the future, given budget constraints. School feeding similarly was viewed as a budget challenge but essential for access to education, although it is not part of the program design.

It was pointed out that ethnic tension as well as other risks, vary by region and should not be seen homogeneously. Participants stressed the importance of peace building and peace education and hoped that it would be included. The team discussed the social cohesion pilots.

Land acquisition was also raised as an issue, particularly in Gambella. The team indicated that where these issues were within the program boundary focusing on the program activities then due diligence would be expected. High deforestation was another concern and participants urged mainstreaming of

energy saving activities. It was also pointed out that the school environment needs improvement. In terms of monitoring the environmental side of these risks, participants shared that the ARRA environment unit has been working on monitoring of environmental activities performed by partners, but not involved in environment protection activities. If ARRA is going to be involved in environmental protection activities, ARRA will need to deploy more staff.

Some clarification was also sought on how risk ratings were established. Finally, international experience and best practice was asked for in implementing this program.

In the afternoon, group discussion was conducted by grouping the participants into five by their region. The national participants were distributed to join the regions. The groups discussed on the following topics: (i) level of awareness and enforcement of legal frameworks by the implementing agencies applicable to GEQIP-E AF; (ii) institutional commitments and current capacity for the implementation of safeguards in MoE and ARRA; (iii) major environmental and social impacts and risks of GEQIP-E AF; (iv) soundness and applicability of recommended mitigation measures/actions; (v) their final observations and recommendations.

The participants noted that the implementing agencies have the awareness of the legal frameworks of the country but they do not have the experience of implementing it due to low capacity and decision makers' limited commitment. They all agreed on the identified environmental and social risks and their rating, except that one group that noted the SGBV risk should be moderate. Concerning the soundness and applicability of the proposed mitigation measures, they agreed that the mitigation measures are good, but some items will require huge cost that will be beyond the capacity of the government to implement. This specific feedback was noted.

Action items of the previous PAP that were identified as being beyond the government capacity to implement by the participants were: (i) establish special need resource centers at central location for refugee and host community students and equip with the necessary special need materials and trained professionals; (ii) employing new social workers and providing top-ups for supporting unaccompanied and separated children; (iii) provide scholastic materials including school uniforms for host community students to balance service provision for host and refugee students attending the same classes; and (iv) establish safe places or wellness centers furnished with sanitary pads and water for host community students in all schools; and (v) maintain refugee national teachers current salary and if their salary would be reduced help the national teachers to get their current salary level with top-up payments.

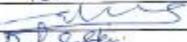
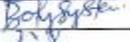
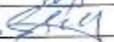
One group proposed the provision of pocket money for high school refugee students who are traveling long distance to reach their schools to cover their transportation cost. But other participants indicated this will not be accepted by the government and they noted that UNHCR and ARRA should find another solution for this problem of refugee children. Overall, the discussants reflected their observation as the procedure followed the World Bank is very good and will be a model for other organization working to ensure environmental and social sustainability.

Finally, the workshop was finalized with a closing speech made by Sophie Lashford representing the Education team. She thanked all the participants for their active participation and all their comments,

suggestions and feedbacks. She noted that their comments and feedback are good inputs for the program and will be considered to finalize the ESSA as well as the AF program PAD.

UNHCR protection colleagues were unable to join the ESSA consultation but the draft was shared via email and detailed comments, including from the child protection lead, were obtained and integrated.

Annex 6: List of National ESSA Stakeholders Participants

Attendance List				
No.	Name	Region	Position	Signature
ARRA				
1	Abebe Bogale	Jijiga	REB	
2	Abdiladif Yahya Abebe	Jijiga	HC	
3	Ali Ahmed Mohammed	Afar	HC	
4	Asmeraw Belay	BG/Assosa	REB	
5	Bol Yiech Lua	Gambella	HC	
6	Deginet Daniel	Gambella	REB	
7	Ephrem Hagos	Tigray/Shire	REB	
8	Girma Workiyie Mersha	Afar	REB	
9	Hussein Mohammed Mershele	Tigray/Shire	HC	
10	Mohammed Assen	Dollo Ado Dadato	REB	
11	Tesda Berhanu Welde	Tigray/Shire	HC	
12	Girumay Kalkos	Mulki's Abacha (1st) Sav. HC		
13	ARTEW ASSEFA	Addis	progrm	
14				
15				
16				
17				

Ministry of Education				
1	Ahmed Mohamud	Afar	HC	
2	Taaha Ahmed Humad	Afar	REB	
3	Habtamu Alene Bemanjo	BG/Assasa	REB	
4	Mussa Asdik	BG/Assasa	HC	
5	Layekun Getaneh	Gambella	REB	
6	Okugn Dman Okane	Gambella	HC	
7	Abdulhakim Mohammed	Somali	RFR	
8	Ahmed Ali Madar	Somali	HC	
9	Eyasu Redae Gebru	Tigray	REB	
10	Yohannes Shereraw Fisseha	Tigray	HC	
11	Ato Abdisa Roba	A.A	Inclusive director	
12	Birhan Hailu	A.A	GEQIP coordinator	
13	Getachew Admasu	A.A	Focal person	
14	Solomon Meskintu	A.A	DICAC - program	
15	Abdisa Roba	A.A	"	
16	Yohannes Meskintu	RDC	W/y/c/development	
17				
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20				
21				
22				
23				

Ministry of Environment				
1	Ahmed Aden Abdulahi	Somali		
2	Elesamali mohammed Elesamali	Afar		
3	Gebremedhin Tesfaye	Tigray/Mekelle		
4	Rwash Tut Gak	Gambella		
5				

UN + NGO
 Rehabilitation and Development organization

	Akliw Assefu	R-Do	Addis	
	Damagh Minogue	UNICEF	Addis	