



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 04/29/2021 | Report No: ESRSC02017



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Lesotho	AFRICA EAST	P175065	
Project Name	Basic Education Strengthening Project (BESP)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	3/30/2021	5/28/2021
Borrower(s)	Implementing Agency(ies)		
The Kingdom of Lesotho	Ministry of Education and Training, Ministry of Social Development		

Proposed Development Objective

To improve student retention and teacher quality in targeted junior secondary schools and pilot specific interventions to strengthen ECCD service delivery.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>7.10</b>

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

No

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

The proposed project will focus on key activities that are priorities for the MoET within the context of its Education Sector Strategic Plan (ESSP) and build on lessons learned and opportunities arising from the current LEQEP and LBEIP projects. These include: (i) improving the retention of students in junior secondary education; (ii) scaling up online teacher training program for junior secondary teachers in Mathematics and Science; and (iii) strengthening the delivery of quality ECCD service, including by expanding reception classes in existing primary schools using cost-effective and innovative approaches. Within this framework, the project will support the following four components:



Component 1 will focus on improving the retention of students in junior secondary education as well as improving quality of teaching in mathematics and science. To this end, the component will focus on expanding cash transfers to poor households to alleviate the economic burden of junior secondary education and motivate children to stay in school. The component will also evaluate and scale up initiatives on peer support groups for adolescent children (e.g. boys' and girls' clubs) to empower adolescents and enable them to make informed choices. In addition, to improve quality of mathematics and science instruction in junior secondary schools, the component will provide support to strengthen online teacher training, building on existing initiatives. Component 2 will focus on strengthening the delivery of quality ECCD programs by piloting different modalities for construction/renovation of reception classrooms in primary schools serving poor communities, supporting the piloting and roll out of the new ECCD curriculum and building monitoring and regulatory systems in the MoET to manage the sub-sector. Component 3 provides project management, capacity building and technical assistance support to enhance the MoET's capacity to implement the project and ultimately deliver high quality basic education.

#### **D. Environmental and Social Overview**

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

The country is entirely surrounded by South Africa. It has a population of about 2.1 million that is growing at a modest rate of 1.3 percent annually. Lesotho is predominantly mountainous, with the highlands and mountain zones covering approximately 59% of the total land area. This land is mostly characterized by steep slopes with fragile soil formations which are extensively degraded. The highlands cover approximately 15% of the country, while the lowlands and Senqu (Orange) River Valley make up approximately 17% and 9% of the country, respectively. In terms of physical characteristics, the topography of some beneficiary schools is mainly mountainous, inaccessible and remote.

The country's population is youthful, with 76 percent being below the age of 36. It is an open economy, traditionally centered on subsistence agriculture, with textiles, water, and diamonds as its main exports. An estimated 57 percent of the population lives below the national poverty line and 34 percent fall below the extreme poverty line. A wide (30 percent) poverty gap, high rates of unemployment, wide prevalence of HIV/AIDS, and climate vulnerability further constrain the scope for inclusive growth and improvements in living standards. The unemployment challenge is more severe among youth living in rural areas, those with low levels of education, and women. While gender gaps in education have narrowed, dropout of girls remains a problem, and tends to increase after primary school as the pressures of poverty, and traditional gender roles, often push girls into early marriage or intergenerational relationships. Further, pregnancy among adolescent girls is observed as a key driver of dropping out of school. The high rate of teenage pregnancy in Lesotho is a key contributing factor for poor outcomes in early childhood. In addition to its negative impact on girls' education (about 11 percent of girls who drop out of secondary education in Lesotho do so as a result of pregnancy) and the resulting risk of HIV/AIDS. With the high prevalence of GBV, high rates of HIV infection, poor quality and limited access to GBV services, and the lack of specific policies or initiatives to address sexual exploitation and abuse (SEA), children may find school unsafe and choose to drop-out.

The number and selection of target schools will be done prioritizing primary schools that are serving poor and predominantly remote rural communities (building on the work already done the under LEQEP and LBEIP projects). Therefore, the specific locations where civil works will be undertaken have not yet been identified. The designs and specifications for the classrooms in each school and the modality for implementation will all be agreed between the



MoET, including the Early Childhood Education (ECE) technical working group, and the World Bank during the preparation of the project.

Given the complexity and the concentrated number of workers, there is potential for the spread of infectious disease such as COVID-19 during the construction phase. There is also a potential risk of community exposure to COVID-19 infection by the Project workers. The project will exercise appropriate precautions against introducing the infection to local communities. In addition, support for community sensitization, adequate Water, Sanitation and Hygiene (WASH) facilities, procurement of reusable masks and hand sanitizers in schools to support the control of the spread of COVID-19 is planned to be financed separately under the restructuring of the LBEIP. These activities added under the restructuring of LBEIP are meant to provide support for the safe reopening of schools following school closures in March 2020 as a result of the COVID-19 pandemic.

It is expected that the Project will be mainly positive and beneficial for the country as its aim is to improve student retention and teacher quality in targeted schools and to address the equity issues and social inclusion of vulnerable groups.

#### D. 2. Borrower's Institutional Capacity

The Project will be implemented by the MoET, supported by the existing Project Facilitation Unit (PFU) which is responsible for the implementation of the ongoing Lesotho Education Quality Enhancement Project (LEQEP- P156001) and Lesotho Basic Education Improvement Project (LBEIP – P160090) approved under the Environmental Safeguard Policies. The proposed Project will be implemented through the existing PFU. The PFU will be responsible for the preparation and implementation of Environmental and Social (E&S) instruments.

MoET has a long history of implementing World Bank and Global Partnership for Education (GPE) financed projects such as the ongoing Lesotho Education Quality Enhancement Project (LEQEP- P156001) and Lesotho Basic Education Improvement Project (LBEIP – P160090) approved under the Environmental Safeguard Policies. These projects were EA category C and B respectively with minor and reversible environmental and social impacts. This experience has provided the PFU with a capacity to apply World Bank Environmental Safeguards Policies, the development of appropriate safeguards instruments as well as their implementation and monitoring. Currently, the PFU's M&E expert is also serving as the focal person for all social and environmental safeguard related issues. The M&E Specialist has been trained on the World Bank's safeguards policies. However, the Ministry has no previous experience with the World Bank's Environmental and Social Framework (ESF) and does not have qualified and dedicated environmental and social specialists in place. Knowledge and understanding of ESF/ESSs' objectives and requirements of decision makers in MoET, technical and, operational staffs is relatively weak and will have to be supported by appropriate level of sensitization and capacity building intervention at the various levels. Therefore, at Concept Stage, institutional capacity is considered weak.

While in the interim the M&E Specialist will support the project, the PFU will prioritize hiring one Environmental Officer and one Social Officer dedicated to this project prior to Appraisal. Client capacity will be re-assessed during project preparation. Any capacity gaps and strengthening measures, including PFU and other implementing entities training workshops in E&S risk management, for the implementation of the World Bank Environmental and Social Framework will be detailed in the Environment and Social Commitment Plan (ESCP).



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

### A. Environmental and Social Risk Classification (ESRC)

Moderate

#### Environmental Risk Rating

Low

The Project's Environmental Risk Rating is classified as Low due to the nature of the proposed interventions. At earlier stage, the proposed environmental risk rating for the Project was classified as Moderate. This was due to construction works being envisaged, the works have since been removed from the scope of the project, leading to the change in the environmental risk rating from Moderate to Low. Overall, the project activities are focusing on capacity building type of activities including supporting a cash transfer scheme for students from poor households; youth awareness programmes; piloting and evaluating the new ECCD curriculum and mapping ECCD providers; as well as project management support. The Project will not support development of any physical infrastructure. However, under Sub-component 1.3: Strengthening online training models in Mathematics and Science for junior secondary school teachers, there will be some activities involving procurement of some ICT hardware (laptops) to scale up ongoing online teacher training initiatives on math and sciences. Additionally, under the same subcomponent, the Project will support the procurement of portable solar panels for teachers who do not have access to electricity at schools. The repairs, servicing and end-of-life disposal of ICT equipment and solar panels may result in environmental risks related to electronic wastes (e-wastes), hazardous waste and solid wastes if not managed appropriately. Environmental best practices shall be in place for managing repairs and end-of-life disposal of ICT equipment and solar panels involved in the online training programme. The type and amount of such equipment required, the associated cycle of replacement or upgrades, existing e-waste, hazardous and solid waste management measures in project implementing entities, regulatory framework, and in-country capacities, vendors, agencies to manage end of life disposal of electronic equipment, solar panels and parts will be analyzed during project preparation. As such, and in order to ensure the management of e-waste and other hazardous waste, the Project Environmental and Social Management Framework (ESMF) will include a Waste Management Plan (WMP) proportionate to the level of risk. The WMP will include some simple technical guidelines on how to manage and arrange for the disposal of ICT equipment and solar panels (end-of-life and during repairs) in accordance with the requirements of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal which Lesotho is signatory to. All in all, the project activities are not expected to have any major adverse impact on the environment and human health. No long-term or irreversible adverse impacts are expected from project implementation. The potential adverse environmental impacts are minimal and there are no significant adverse risks which are complex, diverse, sensitive or unprecedented. The environmental risk rating will be reviewed periodically throughout the project life cycle to ensure that it continues to accurately reflect the level of risk that the project presents. The ESCP for the Project includes measures to strengthen the MoET and MoSD's capacities to manage Project environmental risks and impacts.

#### Social Risk Rating

Moderate

Proposed social risk is Moderate. Notably, the social risk rating during earlier concept note stage for the proposed project was Substantial. Currently, a Moderate risk rating is proposed due to following reasons: (i) project activities will no longer include any type of civil works, which means that there will be no risks or impacts associated with ESS5 such as physical or economic displacement; (ii) based on the Bank's GBV/SEA/SH risk assessment rating, the social risks of Sexual Exploitation/Harassment and GBV are rated as moderate; and (iii) project activities, by their very nature, serve as positive extenuation of some of the existing GBV risks in the country (such activities include



assistance to low income households to achieve education outcomes/school retention; providing support to youth clubs within schools that serve as “safe space” to empower adolescent girls and boys to enable them to make informed decisions equipping them with relevant life-skills, information and knowledge, etc.). Thus, the project itself would not directly or indirectly cause or contribute to any of the pre-existing social issues related to gender-based violence, and in fact, would attempt to ultimately contribute to their mitigation through improving educational outcomes and school retention rates for girls and boys. Nonetheless, the project preparation took into account contextual risks of GBV as well as importance of safe environment schools, and a GBV Action Plan (as part of ESMF) has been prepared. The GBV Action Plan is proportionate to the GBV risks posed directly by the project activities (which are low to minimal), as well as cognizant of the broader GBV issues in education sector in Lesotho. Ongoing public health crisis due to COVID-19 also contributes to social risks. Social risks, therefore, mainly emanate on two fronts: (1) limited E&S capacity of the PFUs within MoET and MoSD; and (2) ensuring appropriate engagement with local communities and other relevant stakeholders (including with most vulnerable and disadvantaged groups, and ensuring their genuine stakeholder participation in decision-making processes of the project (especially those related to cash transfer sub-component). The following Standards will be particularly relevant to address social risks -- ESS 1, ESS2, and ESS 10. The Project does not pose any social risks associated with ESS7. The following instruments have been prepared and disclosed: draft Stakeholder Engagement Plan, and Environmental and Social Management Framework (which includes GBV Action Plan and Labor Management Procedures, all proportionate to the project risks). The ESCP for the project also includes measures for monitoring the ESF commitments of both MoET and MoSD, as well as requirements for E&S staffing and collaboration between these two entities with regard to sub-component 1.1 on cash transfer program. Component 3 of the project envisions project management, capacity building and technical assistance support to both PFUs in MoET and MoSD.

## **B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

### **B.1. General Assessment**

#### **ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

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

Regarding environmental impacts, the current proposed project activities will not involve any civil works or construction of physical infrastructures that could potentially result in significant and irreversible adverse environmental impacts and risks. However, under Sub-component 1.3: Strengthening online training models in Mathematics and Science for junior secondary school teachers, there will be some activities supporting to procurement of some ICT hardware (laptops) and portable solar panels. The repairs, servicing and end-of-life disposal of ICT equipment and solar panels may result in environmental risks related to electronic wastes (e-wastes), hazardous waste and solid wastes if not managed appropriately.

Potential downstream impacts of the project include potential environmental impacts regarding community health and safety. Sub-component 1.2 plans for interventions including educational program on health awareness including topics such as basic health, nutrition, hygiene, etc. that will decrease health and safety risks of the target audience of the education programs.

To mitigate for potential adverse environmental impacts, the MoET and MoSD will prepare an Environmental and Social Management Framework (ESMF) by project appraisal. The ESMF will include a Waste Management Plan (WMP) proportionate to the level of risk. The WMP will include applicable technical guidelines on how to manage e-waste and hazardous waste including storage, collection, transport, reuse, recycling, and disposal in accordance with the



requirements of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal which Lesotho is signatory to. The ESMF will also include Labor Management Procedures (LMP) and GBV Action Plan. Furthermore, the ESMF will include a negative list and provide guidance on screening for potential risks and on managing unavoidable environmental and social impacts. Any sub-project classified as Substantial or High Risk will be ineligible. The draft ESMF will be publicly disclosed, both in-country and on the World Bank's website before appraisal.

An inclusive stakeholder engagement plan (SEP) has been prepared in consultation with relevant stakeholders. However, the COVID 19 pandemic poses a challenge for stakeholder engagement and disclosure of information, and stakeholder engagement and consultation processes will be guided by the World Bank's "Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings" (March 20, 2020) and the MOET and MoSD guidelines. An updated SEP will identify vulnerable and disadvantaged groups, and explore differentiated methods to enable their effective participation in decision-making processes of the project (especially those related to cash transfer sub-component).

A draft Environmental and Social Commitment Plan (ESCP) has been prepared by the Recipient. The ESCP sets out the substantive measures and actions that will be taken by the MoET and MoSD to meet environmental and social requirements. The MoET and MoSD will monitor the environmental and social performance in accordance with the ESCP.

**Areas where "Use of Borrower Framework" is being considered:**

Recipient Framework is not being considered under this project.

**ESS10 Stakeholder Engagement and Information Disclosure**

The Ministry of Education and Training will engage in meaningful consultations with all stakeholders during project preparation and throughout the project life cycle as per ESS10 requirements. An inclusive stakeholder engagement plan (SEP) will be prepared in consultation with relevant stakeholders. To ensure inclusive engagements consultations will also target vulnerable groups, especially the remote rural communities, elderly, children with special needs, persons with disabilities, women, female headed households and orphans and vulnerable children. The SEP will ensure timely, relevant and accessible information (format and location) to stakeholders with particular focus on groups that are more at risk of exclusion from project activities (such as communities in remote inaccessible rural areas and vulnerable groups). The SEP will include and maintain a description of all stakeholder consultations, questions/opinions received as well as summary of responses provided. It will also indicate communication channels for all stakeholders and will include the roles and responsibilities of stakeholders in the implementation of the project. The SEP will be disclosed on the Ministry's website and on the World Bank's external website prior to appraisal.

The SEP will include a culturally appropriate and accessible GRM (in format and location) as an effective channel for receiving feedback, managing and resolving complaints arising due to project activities. The GRM will also accommodate SEA/SH reporting and a referral pathway for survivors.

As the COVID-19 pandemic poses a challenge for stakeholder engagement and disclosure of information, as stakeholder engagement and consultation processes cannot be conducted in a traditional way. Consultations will therefore, be conducted inline with guidelines set out in the World Bank's "Technical Note: Public Consultations and



Stakeholder Engagement in WB-supported and operations when there are constraints on conducting public meetings” (March 20, 2020) MOET and WHO guidelines.

## **B.2. Specific Risks and Impacts**

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

### **ESS2 Labor and Working Conditions**

ESS2 is relevant to the project interventions. The project is expected to employ direct and contracted workers. While the number of workers cannot be estimated at the current stage, no large-scale labor influx or labor camps are expected. As Lesotho has high levels of unemployment and unskilled construction labor is expected to be readily available in project communities and the project will prioritize recruitment of local unskilled labor. The project will also utilize community construction committees to minimize labor influx. Activities to be supported under the project are expected to have minimum adverse impacts in terms of labor and working conditions as stipulated in ESS2 and in accordance with the requirements of national laws and regulations (Lesotho Labor Code).

There is potential risk of community exposure to the spread of infectious disease such as COVID-19 during the construction phase. The project will exercise appropriate precautions against introducing the infection to local communities. MoET has prepared a COVID-19 Method Statement based on the World Bank safeguards interim note for COVID-19 considerations in construction/civil works projects to guide safe planning and implementation of construction works. Furthermore, as a first step in ensuring safe re-opening of schools, MoET has developed the following two key documents: (i) Operating Guidelines for The Containment and Management of COVID-19 For Schools and School Communities and (ii) School Reopening Strategy in Response to Novel Corona virus (COVID-19) in line with WHO guidelines.

There could be some GBV/SEA/SH risk at workplace during construction phase. Mitigation measures relating to occupational health and safety will be documented in the labor management procedures (LMP) that will be incorporated in the ESMF to protect workers from risks in the workplace. The mitigation measures will incorporate the World Bank Group's General Environment, Health, and Safety Guidelines (EHSs) and other Good International Industry Practices. A detailed GBV/SEA/SH action plan will be prepared as part of the ESMF and will include codes of conduct, training and awareness raising on GBV/SEA/SH issues and prevention, as well as a referral pathway for survivors. These will be prepared by the Borrower and/or the contractor prior to the commencement of civil works.

Mitigation measures relating to occupational health and safety will be documented in labor management procedures (LMP) to protect workers from risks associated with exposure to hazards encountered in the workplace. The mitigation measures will incorporate the World Bank Group's General Environment, Health, and Safety Guidelines (EHSs), and other Good International Industry Practices. The LMP will include mitigation measures to prevent and minimize the risk and spread of the COVID-19 virus in the Project's workplace. A separate worker Grievance Redress Mechanism will be established and a focal point will be appointed to receive and address workplace grievances. The workers' GRM will be outlined in the LMP.





The PFU will ensure that all procurement documents, supervising firms and civil works contracts comply with the Environmental, Social, Health, and Safety (ESHS) mitigation measures based on the WBG Environmental, Health and Safety (EHS) Guidelines, ESMF, SEP, RPF and other relevant instruments. Preventive and protective measures to avoid and minimize risks related to occupational health and safety (OHS) will be defined in the ESMF and subproject instruments, as well as the manner and timeline of training of project workers. Maintenance of training records; documentation and reporting of occupational accidents and incidents will be set.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

ESS3 is currently considered relevant to the Project. The Project is not a potentially significant user of energy. However, project activities will contribute to better resource efficiency as the construction/renovations will include energy efficiency measures like improved insulation and heating efficiency. Anticipated sources of pollution during construction/renovation of reception classrooms in primary schools include dust, noise, erosion and runoff, and handling and disposal of solid and hazardous materials and wastes. The project will not be significant user of water or material resources, apart from that needed for minor civil works.

Noise will potentially result from the use of construction machinery and vehicle movements. Nevertheless, the relatively short-term and small-scale nature of the works indicate that noise levels will not be excessive or cause long-term nuisances. However, the construction/renovations works will present short-term nuisance to the neighboring local communities at some of the project sites. The Environmental and Social instruments such as ESMF and site-specific ESMPs to be prepared will include mitigation measures to minimize and manage the noise levels by applying standard restrictions to hours of site work. When the construction/renovation works take place within schools attended by students, class hours will also be taken into consideration in the management plans.

Air emissions: It is anticipated that during project implementation, airborne emissions will be generated due to transport vehicles, and dust generated by digging activities. Those most likely to be affected are workers and people living within the proximity of construction and/or rehabilitation sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of airborne emissions during construction/renovations. Residual impacts are expected to be limited in scope and duration. The project is not anticipated to be a significant emitter of greenhouse gases (GHGs).

Waste management: Construction/renovations works will generate household wastes from workers and construction wastes which will primarily include excavated soil, wood, cement, and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. The waste generated by construction and/or renovation works, the quantity of which should not be significant, will be eliminated on sites in accordance with the waste management plan for which mitigation measures have been prepared.

Water management: Construction and/or rehabilitation activities may require a higher level of demand for dust control and worker consumption during the construction phase. The ESMF will include measures to ensure that water demand for the project is not sourced in such a manner that may cause adverse impacts to other community users with special attention to be paid to avoid any negative impact and conflict resulting from the use of the water. The project is not anticipated to be a significant user of water.



### **ESS4 Community Health and Safety**

ESS4 is relevant to the project interventions. Given the small-scale nature of civil works, the impact and risk on communities' health and safety is expected to be minor and manageable, since the project's civil works will mainly be undertaken in or around existing schools, it is important to maintain the health and safety of students, teachers and school staff, visitors and nearby communities throughout the construction phase. Construction can also disrupt the learning process through dust emission, noise, increased generation of solid waste, etc. Potential threats to people and communities may be posed by uncovered excavated sites, trenches, open holes, open electric cables, etc. Partition of construction area by putting in place fences, signaling, mitigation measures to control excessive noise and dust levels, and secure access to the area for the workers and public use will be ensured. During rehabilitation and construction of new classrooms, it is anticipated that access to schools will be restricted during construction. These activities are also likely to result in increased traffic and affect road safety. To safeguard the occupational health and safety of students, school staff, project workers and the local communities, preventive measures will be included in the ESMF and subsequent site-specific ESMPs.

Given the complexity and the concentrated number of workers, there is potential for the spread of infectious disease such as COVID-19 during the construction phase. There is also a potential risk of community exposure to COVID-19 infection by the Project workers. The project will exercise appropriate precautions against introducing the infection to local communities. MoET has prepared a COVID-19 Method Statement based on the World Bank safeguards interim note for COVID-19 considerations in construction/civil works projects to guide safe planning and implementation of construction works. Furthermore, as a first step in ensuring safe re-opening of schools, MoET has developed the following two key documents: (i) Operating Guidelines for The Containment and Management of COVID-19 For Schools and School Communities and (ii) School Reopening Strategy in Response to Novel Corona virus (COVID-19) in line with WHO guidelines.

Construction works may expose children and communities to risks of GBV/SEA/SH which can be exacerbated by the presence of construction workers. A Sexual Exploitation and Abuse/Harassment assessment will be undertaken and an action plan will be prepared prior to appraisal to address GBV/SEA/SH risks. The project ESMF will include mitigation measure for prevention and minimization of GBV/SEA/SH. The site specific ESMPs will also include GBV/SEA sensitivity and appropriate measures to address this risk. The project GRM will include GBV-SEA/SH considerations and a referral pathway for survivors.

Through ESS10, stakeholder engagement will be carried out in line with international good practice as set out by WHO and captured in WBG guidance to limit COVID-19 exposure, including the measures and actions described under ESS10 above.

### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

ESS5 is not relevant to the Project. The project will not finance any civil works, and there are risks or impacts, such as economic or physical displacement, associated with ESS5.



**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

ESS6 is considered not relevant since the Project activities will not have any impact on biodiversity and living natural resources.

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

ESS7 is not relevant to the Project as there are no groups in Lesotho meeting the criteria as set out in ESS7.

**ESS8 Cultural Heritage**

ESS8 is not relevant since the Project will not have any impact on tangible or intangible cultural heritages.

**ESS9 Financial Intermediaries**

ESS9 is not relevant to the Project for the suggested project activities.

**B.3 Other Relevant Project Risks**

No other relevant risks anticipated currently.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?** No

**Financing Partners**

N/A

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

**Actions to be completed prior to Bank Board Approval:**

Draft ESMF and SEP will be prepared and disclosed prior to Appraisal and final instruments will be consulted, finalized and disclosed by Approval. The ESCP (draft will be disclosed prior to Appraisal) and final ESCP will be consulted, finalized, adopted and disclosed by Approval.

Public Disclosure



ESMF will contain LMP and GBV Action Plan.

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

- (i) Periodic reporting on E&S (ii) Incident notification (iii) E&S staffing and budgeting (iv) Grievance management (v) - Implementation of
  - Environmental and Social Management Framework (ESMF)
  - Labor Management Procedures
  - GBV Action Plan as part of ESMF
  - SEP Implementation throughout project implementation
  - Appointment of E&S specialists
  - Capacity building plans for staff from MoET and MoSD and CCCs

**IV. CONTACT POINTS**

**World Bank**

Contact:	Elizabeth Ninan Dulvy	Title:	Senior Education Specialist
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Telephone No:	5369+87092 / 1-202-4587092	Email:	eninan@worldbank.org
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Contact:	Louise Victoria Monchuk	Title:	Senior Economist
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Telephone No:	5369+3208 / 27-12-742	Email:	vmonchuk@worldbank.org
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**Borrower/Client/Recipient**

Borrower: The Kingdom of Lesotho

**Implementing Agency(ies)**

Implementing Agency: Ministry of Education and Training

Implementing Agency: Ministry of Social Development

**V. FOR MORE INFORMATION CONTACT**



## **The World Bank**

Basic Education Strengthening Project (BESP) (P175065)

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The World Bank  
1818 H Street, NW  
Washington, D.C. 20433  
Telephone: (202) 473-1000  
Web: <http://www.worldbank.org/projects>



**VI. APPROVAL**



Task Team Leader(s):	Elizabeth Ninan Dulvy, Louise Victoria Monchuk
Practice Manager (ENR/Social)	David Seth Warren Recommended on 26-Apr-2021 at 17:27:7 GMT-04:00
Safeguards Advisor ESSA	Peter Leonard (SAESSA) Cleared on 29-Apr-2021 at 10:21:33 GMT-04:00