EDO STATE GOVERNMENT

WORLD BANK
PROGRAM-FOR-RESULTS FINANCING

EDO BASIC EDUCATION SECTOR AND SKILLS TRANSFORMATION OPERATION (Edo BESST)

FINAL REPORT

ENVIRONMENT AND SOCIAL SYSTEMS ASSESSMENT (ESSA)

MAY 2020
TABLE OF CONTENTS

TABLE OF CONTENTS .............................................................................................................. 2
EXECUTIVE SUMMARY ........................................................................................................ 4
SECTION I: INTRODUCTION .................................................................................................. 12
  1.1 Background and Purpose of the ESSA ......................................................................... 12
  1.2 ESSA Methodology ..................................................................................................... 13
SECTION II: PROGRAM DESCRIPTION .................................................................................. 17
  2.1 Edo State Development Plan- Edo Basic Education Sector and Skills Transformation
    Program (EDOBESST) ..................................................................................................... 17
  2.2 Program Development Objectives (PDO) and Key Results ................................................ 19
  2.3 PforR Program Scope and Boundary ............................................................................ 221
  2.3.1 Result Area 1: Improved quality and accelerated learning outcomes in basic education 21
  2.3.2 Result Area 2: Improved quality and relevance of pre-service teacher education .......... 25
  2.3.3 Result Area 3: Expanded Access to Digital Skills Development . Error! Bookmark not defined.
  2.4 Disbursement Linked Indicators .................................................................................... 27
SECTION III: PROGRAM CONTEXT ....................................................................................... 29
  3.1 Country and State Context ........................................................................................... 29
  3.1.2 Sectoral (or Multi – Sectoral) and Institutional Context ............................................. 31
SECTION IV POTENTIAL ENVIRONMENTAL AND SOCIAL EFFECTS ................................. 36
  4.1 Overview of Program Risks and Benefits ...................................................................... 37
  4.2 Environmental Benefits ............................................................................................... 39
  4.3 Environmental Risks ..................................................................................................... 39
  4.4 Social Benefits ............................................................................................................. 39
  4.5 Social Risks .................................................................................................................. 41
SECTION V: OVERVIEW OF RELEVANT GOVERNMENT ENVIRONMENTAL AND SOCIAL
MANAGEMENT SYSTEMS .................................................................................................... 43
  5.1 Description of policy and legal framework .................................................................... 43
  5.1.1 Environmental Policy and Regulatory Framework .................................................... 43
  5.1.2 Social Policy and Regulatory Framework .................................................................. 50
SECTION VI: SYSTEMS ASSESSMENT AND IDENTIFICATION OF GAPS ......................... 558
  6.1 System Assessment based on Core Principles ............................................................... 558
  6.2 Grievance Redress Mechanism .................................................................................... 62
SECTION VII: CONCLUSION AND RECOMMENDATION ...................................................... 63
  7.1 Environmental Summary and Recommendations ......................................................... 63
  7.2 Social Summary and Recommendations ....................................................................... 64
SECTION VIII: PROGRAM ACTION PLAN.............................................................................. 64
SECTION IX: FINDINGS FROM STAKEHOLDER CONSULTATIONS ...................................... 668
  9.1 Consultation Event for Preparing ESSA (September 16-18 2019) .................................. 668
  9.2 Disclosure .................................................................................................................... 69
APPENDIX 1: DLI Matrix ........................................................................................................ 71
APPENDIX 2: MDAs AND PRIVATE SECTOR GROUPS VISITED IN EDO STATE AS PART OF
THE ESSA FOR EDO STATE ECONOMIC ECONOMIC TRANSFORMATION
PROGRAM PforR– (PROGRAM FOR INVESTMENT AND JOBS) ......................................... 77
APPENDIX 3: STAKEHOLDER ENGAGEMENT WITH EDO STATEGOVERNMENTOFFICIALS
HELD AT THE SSG’S OFFICE, GOVT HOUSE, GRA, BENIN ON 16TH SEPTEMBER, 2019 ....... 79
APPENDIX 4: STAKEHOLDER ENGAGEMENT WITH EDO STATE GOVERNMENT OFFICIALS HELD AT THE SSG’S OFFICE, GOVT HOUSE, GRA, BENIN ON 17TH SEPTEMBER, 2019 ................................................................. 85

APPENDIX 5: STAKEHOLDER ENGAGEMENT WITH EDO STATE GOVERNMENT OFFICIALS HELD AT THE SSG’S OFFICE, GOVT HOUSE, GRA, BENIN ON 18TH SEPTEMBER, 2019 .......................................................................................................................... 94
EXECUTIVE SUMMARY

1. The World Bank is proposing to support the Edo State Government’s development agenda through an Edo Basic Education Sector and Skills Transformation Operation (Edo BESST) using a hybrid Program-for-Results (PforR) instrument (i.e. a PforR with an Investment Project Financing (IPF) component). The Operation focuses specifically on Basic Education Sector and Technical Skills development. The PforR component links the disbursement of funds directly to the delivery of defined results and builds on increased reliance on borrower safeguard and oversight systems. The Program Development Objective of this Operation is to improve teaching and learning conditions in basic education and expand access to quality digital skills development for youth in Edo State. The PforR will support key aspects of the state’s Basic Education and Skills Development program in line with the overall objective of improving teaching and learning conditions in basic education and access to digital skills by youths of Edo State. The proposed amount of the Operation is US$75 million.

2. The Environmental and Social Management System Assessment (ESSA) for the Edo BESST Program PforR (hereafter, the Program) examines the Federal and Edo State Governments existing environmental and social management systems that are the legal, regulatory, and institutional framework guiding the Program, defines measures to strengthen the system, and integrates these measures into the overall Program. The ESSA is undertaken to ensure consistency with six core principles outlined in paragraph 8 of the World Bank Policy for Program-for-Results Financing to effectively manage Program risks and promote sustainable development.

3. These six principles are:
   i. Environment: Promote environmental and social sustainability in the Program design; avoid, minimize, or mitigate adverse impacts, and promote informed decision-making relating to the Program’s environmental and social impacts
   ii. Natural Habitats and Cultural Resources: Avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program
   iii. Public and Worker Safety: Protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the Program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards
   iv. Land Acquisition: Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at the minimum restoring, their livelihoods and living standards
   v. Vulnerable Groups: Give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of the Indigenous Peoples and to the needs or concerns of vulnerable groups including persons with disabilities.
   vi. Social Conflict: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.
4. The ESSA was prepared by Bank staff and consultant through a combination of reviews of existing program materials and available technical literature, interviews with government staff, non-governmental organizations, regulatory agencies and sector experts. As part of the project appraisal process, consultations were conducted with government and private sector stakeholders. The findings, conclusions and opinions expressed in the ESSA document are those of the consultant and Bank Staff responsible derived from various engagements with relevant stakeholders.

5. The scope of the ESSA includes the activities and systems necessary to achieve the Program Development Objective (PDO), and the proposed Program’s Disbursement Linked Indicators (DLIs)/projects results chain defined in the Program Concept Note. The ESSA examined the state existing environmental and social management system including the legal, regulatory, and institutional framework relevant to the PforR Program, defines measures to strengthen the systems, and integrates these measures into the overall program action plan. A scoping analysis was completed to determine the applicability of each of the six P4R Environmental and Social Core Principles to the various Program DLIs and Results Chain. The scoping exercise was subsequently used to structure the remaining analysis of the ESSA which includes the following elements:

- Review of the baseline environmental and social information to understand the context under which the Program activities are undertaken;
- Analysis of environmental and social benefits and risks of the Program activities related to the DLIs;
- Analysis of the Edo state and federal government level systems for environmental and social management for planning and implementing the Program activities for consistency with the applicable Core Principles;
- Identification of procedural and policy gaps with Bank Policy and Directive for Program-for-Results Financing as well as performance constraints in carrying out environmental and social management processes; and
- Development of a set of viable actions to strengthen the systems and improve environmental and social performance outcomes of the Program.

6. The PforR provides multifaceted support to implement policy, regulatory, governance and social accountability measures of the Edo BESST Program. The ESSA analysis has been considered on two levels: (i) the system as written in laws, regulation, procedures and applied in practice; and (ii) the capacity of Program institutions to effectively implement the system.

7. The Edo State P4R Program aligns with the State Development Plan and the Basic Education and Skills Development Program, particularly the objectives to improve the teaching and learning environment for basic education and expand access to digital skills development by youth and thus enhance job creation and manpower development.

8. The Program Development Objective of this operation is to improve the teaching and learning processes in basic education and expand access to digital skills development by youth in Edo State. It will address the issue of quality of education and ensure accelerated outcomes in basic education in Edo State. It will also enhance manpower development through the training of teachers given the fact that teacher quality is a critical factor in enhancing education outcomes and manpower development. It will equally support improved
governance of Edo digital hub and expand the digital skills and digital entrepreneurship trainings for youths.

9. It will support two result areas, namely: Accelerated improvement of teaching and learning conditions in basic education; and Improved access, quality and relevance of digital skills and entrepreneurship training.

10. Progress towards achieving the PDO will be measured through the following results indicators:

   ▪ Quality of teaching practices in primary and junior secondary schools (as measured through EdoBEST lesson observation instrument using a composite score)
   ▪ Proportion of primary and junior secondary school students with access to EdoBEST home-based program to keep learning going outside school;
   ▪ Number of youths receiving high quality, market relevant digital skills and entrepreneurship training including online training (disaggregated by gender)
   ▪ Number of private sector partnerships for training design and delivery of digital skills and entrepreneurship training programs

11. The summary of the Disbursement Linked Indictors for the Edo Basic Education Sector and Skills Transformation Operation is presented in Table ES1.
12. Given that there are only limited physical works involved in this Program, the environmental risk is limited. The key environmental risk envisioned in the program is the generation of e-waste which is associated with DLI1 and DLI2. The environmental benefits of the PforR are also minimal.

13. Social benefits associated with the PforR programme include increased social spending due to the implementation of DLI1, DLI2 and DLI3; better employability due to improvement in literacy and numeracy and overall education outcomes and expansion of digital
entrepreneurship and skills associated with DLI1, DLI2, DLI3, DLI5, DLI7 and DLI8; reduction in number of out-of-school children, reduced poverty and stronger economic growth.

14. While Edo state has achieved gender parity in primary and Junior secondary level, some social risks are still associated with the PforR programme. The social risks are related to core principle 5 that addresses the needs of vulnerable people, including ethnic minorities. The vulnerable groups that warrant careful consideration in the context of implementing EdoBEST and digital skills and entrepreneurship training (DLI1, DLI2, DLI3 and DLI8) include women (especially the girl child), orphans, children from hard to reach areas, and people with disabilities, and certain ethnic groups. There is also potential risk of exclusion of women especially the girl child under the digital skill and entrepreneurship program.

- **Girl Child:** Although the Nigeria Policy on Education stipulates that access to education is a right for all Nigerian children regardless of gender, religion and disability, sometimes the girl child is discriminated against especially due to culture and social norms, for example, UNICEF indicates that over half of girls in Northern Nigeria are out of school. Thus, there could be discrimination of girls in the implementation of EdoBEST and in digital skills and entrepreneurship training. Besides, inadequate sanitation facilities and safety in schools which are not only health hazards for girls but could also affect school attendance of the girl child. However, as Edo state has already achieved gender parity in primary and junior secondary level and EdoBEST is being rolled out to all schools, the risk of the girl child being excluded from EdoBEST (DLI 1 and 2) is minimal.

- **Out-of-School and Orphaned Children:** Out-of-school children, orphaned and vulnerable children (OVC) may not have enough opportunity to benefit from the EdoBEST initiative. Currently, the EdoBEST initiative does not take account of out-of-school children not minding that the primary school completion rate of 70% in Edo State.

- **Children with Disabilities:** Nigeria has signed the UNCRPD which ensures access to education for people with disabilities and as of February 2018, ratified the Discrimination Against Persons with Disabilities (Prohibition) Act. Along with the World Bank’s commitment to ensure all education financed projects are disability inclusive by 2025, best practices suggest ensuring that all education systems are set up to include every learner in an inclusive setting with supports and resources available to help them achieve their learning outcomes.

- **Also,** there could be tendency of sexual harassment by teachers / instructors in the delivery of digital skills and in entrepreneurship training giving the large number of women, girls and young boys involved in the program.

15. System assessment based on the core principles identified some gaps and risks that need to be filled in order to ensure that the Program interventions are aligned with the Core Principles of Bank Policy for Program-for-Results financing. Following the gaps identified, the following recommendations were made regarding the environmental and social systems.

**Recommendation:**

The process for enacting new laws or amending existing laws in Nigeria/Edo State can be tricky, difficult, endless and are clearly beyond what a project can do and outside the span of control of
the World Bank. To mitigate this risk, the ToR of site specific EIAs will be reviewed to ensure that there is consistent with Nigeria’s EIA act and good international industry practice, including ensuring adequate coverage of Social issues.

16. There is also a need to engage suitably qualified environmental and social risk management specialists in the PIU.

17. **Recommendation:** Formulate guidelines and manuals for mainstreaming stakeholder engagement process, and environmental, health and safety issues into the implementation of the Program including gender and disable people organization.

18. **Recommendation:** Conduct annual monitoring of progress on environmental and social issues, especially regarding the compliance of the Program activities with the environmental standards and regulations

19. **Recommendation:** The ESSA recommends that the implementing agency should develop plans and make special provision for orphaned and vulnerable children in Edo State in the implementation of EdoBEST initiatives. The current Edo SUBEB policy should be revised to incorporate this to ensure that this category of citizens is not left out. The ESSA also recommends that EdoBEST provide safe and adequate sanitation facilities that are gender sensitive and accessible to people with disabilities at the training centers including:

   - Provide perimeter fencing to ensure safety after careful consideration of the ownership of the land in the vicinity of the school / training centers. Where the land does not belong to the school, applicable acquisition process in line with P4R core principle will be applied.
   - Increase number of female teachers to provide additional counselling to girls on health and personal development:
   - Increase advocacy programs to raise awareness on the importance of girls’ and boys’ education and education of children with disabilities
   - Provide universal access in all training centers to ensure inclusion
   - Provide sensitization program for parents of children with disabilities on inclusive education
   - Develop curriculum adapted for students with disabilities.
   - Monitoring report will document the information on numbers of students disaggregated according to gender and disability to ensure inclusion as part of broader program annual environmental and social risk management implementation.

20. **Recommendation:** Currently there is no strategy on ground to incorporate the large number of out-of-school children in the EdoBEST program. Although the SUBEB during stakeholder interaction indicated that they have plans to create learning centres in communities to involve out-of-school children, this plan is not robust as there is no strategy guiding it and there is no clear action plan. Thus, there is a need to develop a strategy to incorporate out-of-school children (including children with disability) in the program.

21. **Recommendation:** Incorporate issues of sexual abuse and gender-based violence in training programs for teachers and in the Delivery of Digital Skills and digital entrepreneurship
training. This can be done by sensitizing the teachers and trainees on what constitutes sexual abuse and gender-based violence, displaying of posters and notices in the surroundings on the training centres and in schools including:

- Development of institution code of conduct for teachers and administrative measure mechanism that prohibits GBV and SEA among students and teachers.
- Teachers and staff should be trained on how to respond to students and pupils experience GBV/SEA.
- Identify school-based counselling and referral services by appointing a focal person for GBV/SEA cases.

22. **Recommendation:** Furthermore, given the number of MDAs that will be involved in the execution of the program, the ESSA recommends the creation of an office for interagency coordination (Interagency Coordination Office) in Edo State.

23. The ESSA Analysis presented identifies strengths, gaps and opportunities in Edo State’s environmental and social management system for effectively addressing the environmental and social risks associated with the Program and aligning with the Core Principles of Bank Policy for Program-for-Results Financing. These gaps and opportunities have been translated into a viable strategy to strengthen and monitor environmental and social management capacity and performance of Edo State and incorporated into the Program’s overall Action Plan. The Program’s Action Plan, presented below, covers environmental and social actions linked to the ESSA, and will be part of the credit agreement. These Actions are subject to further refinement during the negotiation process or during implementation, as required.

24. Based on the recommendation, Table ES2 and Table ES3 provides the breakdown of Program Action Plan (for environment management and social management respectively) that could be followed in order to implement the recommendations. The plan includes indicative timeline, responsibility for implementation and indicators for measuring the completion of such actions.
### Table ES2: Program Action Plan for Environmental Management

<table>
<thead>
<tr>
<th>S/NO</th>
<th>Action Description</th>
<th>Due Date</th>
<th>Responsible Party</th>
<th>Completion Measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Formulate guidelines for implementing agency on mainstreaming stakeholder engagement process, and environmental, health and safety issues into waste management. Specifically, Implementing agency will maintain collection bins or electronics take-back booths in specific locations in the institution and transport the collected e-waste to government approved disposal facilities for handling hazardous waste. In addition, there will be a manifest for tracking of the e-wastes to ensure that e-wastes collected arrive at the final disposal sites/facility.</td>
<td>Before start of program implementation</td>
<td>Edo MOE, Edo IPA, SUBEB, implementing agency</td>
<td>Completed guidelines in booklet form disseminated to stakeholders, training provided, and the guidelines operationalized The manual which will be simplified will be used by waste managers/handlers.</td>
</tr>
<tr>
<td>2</td>
<td>Conduct annual review and monitoring of progress on environmental and social risks, especially regarding the compliance of the Program activities with the environmental standards and regulations</td>
<td>Within 12 months of end of each FY</td>
<td>Edo MOE, Edo IPA, SUBEB, implementing agency</td>
<td>Completed report with recommendations about E&amp;S issues, including the progress of the implementation of actions indicated in this table. Follow-up measures to the recommendations taken in the following FY.</td>
</tr>
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</table>

### Table ES3: Program Action Plan for Social Management

<table>
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<tr>
<th>S/No</th>
<th>Action Description</th>
<th>Due Date</th>
<th>Responsible Party</th>
<th>Completion Measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Engagement of Environmental and social specialists</td>
<td>Before Program implementation</td>
<td>Implementing Agency</td>
<td>Inclusion of Environmental and social Specialist in the team</td>
</tr>
<tr>
<td>2</td>
<td>Develop plans to incorporate provisions for orphaned and vulnerable children including strategy to accommodate out of school children in the program and children with disabilities</td>
<td>Continue during program implementation</td>
<td>Edo Ministry of Education- Edo SUBEB / Implementing Agency</td>
<td>▪ Documented Implementation report to include: Provision of adequate safe and adequate sanitation facilities that are gender sensitive and accessible to people with disabilities sanitation facilities at the training center including: Provide perimeter fencing to ensure safety Encourage more female teachers to provide additional counselling to girls on health and personal development: Increased advocacy program to sensitize on importance of girls and boy’s education and children with disabilities Provide universal access in all training centers to ensure inclusion and increase sensitization for parents of children with disabilities on inclusive education Develop curriculum and teaching model adapted for children with disabilities including students outside school. Document the information on numbers of students according to gender and disability to ensure inclusion as part of overall program annual E&amp;S risk management implementation</td>
</tr>
<tr>
<td>3</td>
<td>Develop a plan to deal with issues of sexual abuse and gender-based violence in capacity building programs for teachers and in the Delivery of Digital Skills and digital entrepreneurship training</td>
<td>Prior to program implementation and continue throughout program implementation</td>
<td>Edo Ministry of Education- Edo SUBEB / Implementing Agency</td>
<td>Document detailing the policy of dealing with sexual abuse and gender violence in Edo BEST and digital skill training in place. Development of institution code of conduct for teachers and administrative measure mechanism that prohibits GBV and SEA among students and teachers. Teachers and staff should be trained on how to respond to students and pupils experience GBV/SEA. Identify school-based counselling and referral services by appointing a focal person for GBV/SEA cases. Including guidelines on bullying</td>
</tr>
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SECTION I: INTRODUCTION

1.1 Background and Purpose of the ESSA

25. The World Bank is proposing to support Edo State’s Basic Education and Skills Development Program (Edo BESDP) with a hybrid Program-for-Results (PforR) Operation (Pfor R with Investment Project Financing (IPF) component) focused specifically on Basic Education and Skills Development. The PforR links the disbursement of funds directly to the delivery of defined results and builds on increased reliance on borrower safeguard and oversight systems. The Program Development Objective of this operation is to improve the teaching and learning processes in basic education and expand access to quality digital skills development for youth in Edo State. The PforR will support key aspects of BESDP in line with the overall objective of improving teaching and learning conditions in basic education and access to digital skills by youths of Edo State. The PforR will have two key result areas, namely, (i) Accelerated improvement of the teaching and learning conditions process in basic education through technology and innovation; and Improved access, quality and relevance of digital skills and entrepreneurship training. The result indicators for measurement of the achievement of the PDO is as detailed in appendix 1. The proposed amount of the Operation is US$75 million.

26. The Environmental and Social Management System Assessment (ESSA) for the Edo BESST Program PforR (hereafter, the Program) examines the Federal and Edo State Governments existing environmental and social management systems that are the legal, regulatory, and institutional framework guiding the Program, defines measures to strengthen the system, and integrates these measures into the overall Program. The ESSA is undertaken to ensure consistency with six core principles outlined in paragraph 8 of the World Bank Policy for Program-for-Results Financing to effectively manage Program risks and promote sustainable development.

27. These six principles are:
   i. Environment: Promote environmental and social sustainability in the Program design; avoid, minimize, or mitigate adverse impacts, and promote informed decision-making relating to the Program’s environmental and social impacts
   ii. Natural Habitats and Cultural Resources: Avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program
   iii. Public and Worker Safety: Protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the Program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards
   iv. Land Acquisition: Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at the minimum restoring, their livelihoods and living standards
v. **Vulnerable Groups**: Give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of the Indigenous Peoples and to the needs or concerns of vulnerable groups including people living with disability

vi. **Social Conflict**: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

28. The ESSA analyzes the system for environmental and social management as relevant for the Program vis-à-vis each of these principles. The gaps identified through the ESSA and subsequent actions to fill those gaps directly contribute to the Program’s anticipated results to enhance institutional structures related to the Program activities. The ESSA analysis presents a detailed description of the Program activities and the baseline conditions for existing environmental and social management systems. The Report draws on baseline information and presents an analysis of the existing system vis-à-vis the core principles for environmental and social management in Bank Policy and Directive for Program-for-Results financing and presents a Program Action Plan (PAP) that will be incorporated into the overall Program loan documentation.

1.2 **ESSA Methodology**

29. The ESSA was prepared by Bank staff and consultant through a combination of reviews of existing program materials and available technical literature, interviews with government staff, non-governmental organizations, regulatory agencies and sector experts. As part of the project appraisal process, consultations were conducted with government and private sector stakeholders. The findings, conclusions and opinions expressed in the ESSA document are those of the consultant and Bank Staff responsible derived from various engagements with relevant stakeholders.

30. The scope of the ESSA includes the activities and systems necessary to achieve the Program Development Objective (PDO), and the proposed Program’s Disbursement Linked Indicators (DLIs)/projects results chain defined in the Program Concept Note. The ESSA examined the state existing environmental and social management system including the legal, regulatory, and institutional framework relevant to the PforR Program, defines measures to strengthen the systems, and integrates these measures into the overall program action plan. A scoping analysis was completed to determine the applicability of each of the six P4R Environmental and Social Core Principles to the various Program DLIs and Results Chain as presented in Table 1.1. This scoping exercise was subsequently used to structure the remaining analysis of the ESSA which includes the following elements:

- Review of the baseline environmental and social information to understand the context under which the Program activities are undertaken;
- Analysis of environmental and social benefits and risks of the Program activities related to the DLIs;
- Analysis of the Edo state and federal government level systems for environmental and social management for planning and implementing the Program activities for consistency with the applicable Core Principles;
- Identification of procedural and policy gaps with Bank Policy and Directive for Program-for-Results Financing as well as performance constraints in carrying out environmental and social management processes; and

- Development of a set of viable actions to strengthen the systems and improve environmental and social performance outcomes of the Program.

31. The PforR provides multifaceted support to implement policy, regulatory, governance and social accountability measures of the Edo BESST Program. The ESSA analysis has been considered on two levels: (i) the system as written in laws, regulation, procedures and applied in practice; and (ii) the capacity of Program institutions to effectively implement the system.
Table 1.1: Applicability of Core Environmental and Social Principles (CP) to Edo State Economic Transformation Program Disbursement Linked Indicators (DLIs)

<table>
<thead>
<tr>
<th>DLI</th>
<th>CP1 Environment</th>
<th>CP2 Natural Habitats</th>
<th>CP3 Public &amp; Worker Safety</th>
<th>CP4 Land Acquisition</th>
<th>CP5 Vulnerable groups</th>
<th>CP6 Social Conflict</th>
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<tr>
<td><strong>DLI 1: Proportion of primary schools implementing Edo BEST for improved quality and accountability</strong>&lt;br&gt;The DLI will support the continued expansion and continuation of the program, as well as its evaluation and continual improvement. It will focus on increasing the number of primary schools implementing Edo BEST using technology-enabled scripted lessons, teacher management, and quality assurance and learning materials available and accessible for all students, increased learning outcomes in literacy and numeracy for pupils.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Applicable. The program will measure the number of vulnerable children with access to learning materials (text books, homework book etc.)</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td></td>
</tr>
<tr>
<td><strong>DLI 2: Proportion of JSS implementing EDO BEST for improved quality and accountability</strong>&lt;br&gt;This DLI will focus on increasing the number of JSS implementing Edo BEST with inclusive syllabus. The DLI activities are designed to support from development through implementation and evaluation. The initial activity ensures that a quality program is developed, including syllabus evaluation and preparation, development and production of instructional materials, training programs for teachers and principals, and quality assurance and evaluation programs. This is followed by a comprehensive pilot that includes treatment and control groups to determine the effectiveness of the model and identify areas for improvement. This is followed by scaling up to all junior secondary schools and further evaluation.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Applicable. The program will measure the number of vulnerable children with access to learning materials (text books, homework book etc.)</td>
<td>Not Applicable</td>
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<td><strong>DLI 3: Development and implementation of EdoBEST@Home program to support students outside school.</strong>&lt;br&gt;The DLI will support the development of remote learning programs which offer opportunities to improve the overall education systems by providing remedial and scaffolding support to students outside school (especially those with low achievement) and reaching out of school students by providing the ability to learn anywhere, anytime. In addition, the development and integration of remote learning builds resilience into the system to continue educational delivery in the event of pandemic or natural disaster leading to some or all schools closing such as that occasioned by COVID-19.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Applicable. The program will measure the number of vulnerable children with access to learning materials (text books, homework book etc.)</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td></td>
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<td><strong>DLI 4: Development and implementation of BEMIS system with use in key management functions</strong>&lt;br&gt;The DLI will support design and development of the Basic Education Management Information System (BEMIS), followed by integration of its use for management and decision-making purposes. The DLI will also support the design of a new reward and accountability system with career progression and promotion scheme</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable. No physical works supported by the Program.</td>
<td>Applicable. Opportunities for women and youth and other marginalized groups like children with disabilities to access Program benefits will be considered. Ensure indicators on disability are included in the BEMIS.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td></td>
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<td>DLI</td>
<td>CP1 Environment</td>
<td>CP2 Natural Habitats</td>
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<td>DLI 5: Development and implementation of a Learning Assessment Strategy and System</td>
<td>Not applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
<td>Applicable. Opportunities for women and youth and other marginalized groups like children with disabilities to access Program benefits will be considered.</td>
<td>Not Applicable as there are no physical works supported by the Program.</td>
</tr>
<tr>
<td>DLI 6: Quality assurance (QA) and accreditation of pre-service programs</td>
<td>Not applicable.</td>
<td>Not applicable.</td>
<td>Not applicable</td>
<td>Not applicable</td>
<td>Not Applicable.</td>
<td>Not applicable</td>
</tr>
<tr>
<td>DLI 7: Establishment of Board of Directors to provide strategic and policy guidance including the establishment of a PPP model to encourage and support private sector participation in training delivery at innovation hubs</td>
<td>Not applicable.</td>
<td>Not applicable.</td>
<td>Not applicable</td>
<td>Not applicable</td>
<td>Not applicable.</td>
<td>Not applicable</td>
</tr>
<tr>
<td>DLI 8: Delivery of market relevant digital skills and digital entrepreneurship trainings</td>
<td>Not applicable.</td>
<td>Not applicable.</td>
<td>Not applicable</td>
<td>Not applicable.</td>
<td>Not applicable.</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>
SECTION II: PROGRAM DESCRIPTION

2.1 Government program - Edo state Basic Education and Skills Development Program (Edo BESDP 2020-2024).

32. The BESDP was drawn from the Social Welfare Development pillar of Edo State’s Development Plan, 2017-2020 which was recently updated for the period 2020-2024.

33. The Edo State Development Plan, 2020-2024 is anchored in six pillars which include: (i) Institutional Reforms, which focuses on increased efficiency in governance and administration of justice; (ii) Infrastructural Development, which seeks to reduce the cost of service delivery and improve productivity, including through expanding ICT; (iii) Economic Revolution, which has an emphasis on generating job opportunities through investment promotion in priority sectors and improving the ease of doing business in the state; as well as access to capital, accessible technology, accessible infrastructure, skills development and entrepreneurship development; (iv) Culture & Tourism which focuses on rehabilitation and upgrading of tourism assets and making Edo state a top tourist destination in Nigeria; (v) Environmental Sustainability which focuses on erosion and flood control, effective waste disposal and prevention of environmental degradation; and (vi) Social Welfare Enhancement which focuses on strengthening human capital development (education, innovation & digital skills; health, social protection) in a cost-effective way and stemming of irregular migration and human trafficking.

34. The Social Welfare Development Pillar of the Edo State Development Plan 2020-2024 focuses on three priority areas. These are: (i) Health; (ii) Education, Innovation & Digital Skills; and (iii) Social and Youth Development. This Pillar (Figure 2.1) is essentially the human capital development agenda of the state government, the overarching goal of which is to strengthen the human capital of the state in a cost-effective way through ensuring that good healthcare, education, skills and sports programs of global standards are available to all citizens including persons with disabilities of Edo State with value-for-money delivered, and also improved living conditions attained. Under the Health category, the goal is to achieve improved quality of healthcare service delivery in the state, with adequate personnel and increased use of accessible medical facilities by citizens, while the Social and Youth Development component aims to empower the youth including youth with disabilities to enhance their productivity and increase their participation in all sectors of the state’s economy, as well as increase their participation in sports, which in itself is a productive endeavor. The component also aims to achieve a reduction in the volume of irregular out-migration of youths from Edo state. The Education, Innovation and Skills component aims to foster an inclusive and improved educational system, with high rates of student enrolment at all levels and all abilities, producing successful and employable graduates. The key focus areas of this component are: i. Basic Education – where the government has introduced a wholesale Basic Education Sector Transformation Program; ii. Technical and Vocational Education (TVET), which the government is overhauling through a first step of reconstructing an old Technical College in its capital city of Benin-City to serve as a regional hub for skills acquisition and improvement; and linking TVET delivery to labor market requirements because it recognizes the criticality of building the human capital of its citizens to respond to the requirements of a dynamic private sector-driven jobs market which it seeks
to create; iii. Innovation and Skills Development, with a special emphasis on digital skills and entrepreneurship development; and iv. Teacher Training and Manpower Development whereby the state government is ramping up pre-service and in-service teacher reforms aimed at producing highly-qualified teachers.

**Figure 2.1: Edo State’s Social Welfare Development Pillar**

![Social Welfare Development Diagram](image)


35. The BESDP was therefore developed as an umbrella framework to capture the state government’s approach to basic education and skills development and consequently, employability. The program comprises of the government’s vision and plans to enhance the quality and delivery of basic education and technical skills (formal technical & vocational as well as rapid up-skilling - digital and others). It is formalized through a rolling medium-term sector strategy (MTSS) process which allocates budgetary resources to the components over a medium-term horizon. The key reform areas of BESDP is shown in Figure 2.2. The budget for the Government program over the next five years (2020-2024) is estimated at US$348 million.
1.2 Program Development Objectives (PDO) and Key Results

36. The Program Development Objective of this operation is to improve the teaching and learning processes in basic education and expand access to digital skills development by youth in Edo State. The proposed Program aims to achieve its PDO by addressing binding constraints that hinder education quality improvement and market-relevant skills development.

37. Progress towards achieving the PDO will be measured through the following results indicators:

i. Quality of teaching practices in primary and junior secondary schools (as measured through EdoBEST lesson observation instrument using a composite score)

ii. Proportion of primary and junior secondary school students with access to EdoBEST home-based program to keep learning going outside school;

iii. Number of youths receiving high quality, market relevant digital skills and entrepreneurship training including online training (disaggregated by gender)

iv. Number of private sector partnerships for training design and delivery of digital skills and entrepreneurship training programs

38. Figure 2.3 provides a graphical presentation of the detailed linkage between challenges, activities and expected results/outcomes of the Program.
Figure 2.3: Theory of Change

<table>
<thead>
<tr>
<th>Development Challenge</th>
<th>Program Activities</th>
<th>Intermediate Outcomes</th>
<th>PDO</th>
<th>Long Term Impact</th>
</tr>
</thead>
</table>
| Improved teacher development and curriculum | - Teacher training and intensive coaching  
- Instructional leadership and management training of principals  
- Continuous Professional Development of lecturers  
- Implementation of new pre-service curriculum and programs  
- COE Quality Assurance Framework accreditation process | - Improved teaching and learning conditions  
- Better school and teacher management  
| Enhanced School Infrastructure | - Improved facilities  
- Provision of new technology and materials in classrooms | | | |
| Strengthened Community Participation and Partnerships | - Capacity building of School Based Management Committees. | | | |
| Enhanced organizational development for SUBEB and LGAs | - Technology-enabled workplace  
- Improved data collection and analysis | | | |
| Strengthening the management and governance structure for Ed创 Innovates | - Finance Institutional and governance set-up and implementation arrangements  
- Establishment of governance structures to ensure alignment with the innovation hubs goals, resources and decision-making process. | | | |
| Improving access to quality and market-relevant digital skills training | - Establishment of two new digital hubs with private sector  
- Curriculum development and training programs designed with the private sector to ensure linkages with industry and relevance of content.  
- Host private providers of digital skills training services.  
- Digital skills training for linking at least 70 percent of youths trained at the hub to employment opportunities. | | | |

Source: World Bank Project Task team
1.3 **PforR Program Scope and Boundary**

39. The PforR (The “Program”) consists of the Basic Education and Digital Skills & Innovation components of the BESDP. Accordingly, the Program consists of two results areas, namely: (i) Accelerated improvement of the teaching and learning process in basic education through technology and innovation and (ii) Improved Access, Quality and Relevance of Digital Skills and Entrepreneurship Training. Figure 2.4 is boxes showing the PforR program scope while Table 2.1 shows the BESDP indicating government program and program supported by PforR.

*Figure 2.4: Boxes showing PforR program scope. (Green-colored boxes highlight the PforR Program Scope)*
## Table 2.1: BESDP indicating Government Program and Program Supported by PforR

<table>
<thead>
<tr>
<th>Government program</th>
<th>Program supported by the PforR</th>
<th>Reasons for non-alignment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Edo State Basic Education &amp; Skills Development Program</td>
<td>Edo Basic Education Sector &amp; Skills Transformation Program</td>
<td>The PforR Program is a subset of the Government program.</td>
</tr>
<tr>
<td>To increase learning gains in literacy and numeracy through the empowerment of public primary school teachers in Edo State and enhance the skills of Edo’s youth for employability and job creation.</td>
<td>To improve the teaching and learning processes in basic education and expand access to digital skills development by youth in Edo State.</td>
<td></td>
</tr>
</tbody>
</table>

### Interventions

#### 1. Basic Education Reforms
- Governance & Institutional Reform
- Teacher Development & Curriculum
- Community Participation & Partnerships
- School Infrastructure
- Organizational Development for SUBEB and the 18 Local Government Education Authorities (LGEAs)

#### 2. Skills Development

- **Formal TVET**
  - Renovation and upgrade of TVET Colleges
  - Establishment Private Sector Partnerships for TVET colleges for curriculum development, etc.

- **Short-term Skills Development**
  - Digital Skills, Entrepreneurship & Innovation
    - Provision of clusters for digital skills & entrepreneurship training, start-ups and business incubation.
    - Establishment of stronger institutional and governance arrangements for digital skills & entrepreneurship trainings.
    - Curriculum development and digital training programs designed with the private sector to ensure linkages with industry and relevance of content

- Other Skills
  - Provision of high-quality work-readiness and employability skills training for youth in other areas: baking, hairdressing, tailoring, etc.
  - Matching qualified Edo youths with job openings

### Duration

<table>
<thead>
<tr>
<th>Title</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>To improve the teaching and learning processes in basic education and expand access to digital skills development by youth in Edo State.</td>
<td>2020-2024</td>
</tr>
</tbody>
</table>

### Geographic coverage

<table>
<thead>
<tr>
<th>Title</th>
<th>Geographic coverage</th>
</tr>
</thead>
<tbody>
<tr>
<td>To improve the teaching and learning processes in basic education and expand access to digital skills development by youth in Edo State.</td>
<td>All the state</td>
</tr>
</tbody>
</table>

---

### 2.3.1 Result Area 1: Accelerated improvement of the teaching and learning process in basic education through technology and innovation

40. This results area basically supports Edo Government’s EdoBEST program which aims to substantively overhaul the basic education sector in Edo state. It aims to improve learning outcomes in basic education through the implementation of a set integrated reforms and interventions developed under the EdoBEST program, focusing on the development of a highly-skilled, motivated teaching workforce. It leverages technology, empowers teachers to improve learning outcomes, and involves intensive training and ongoing support, the provision of teacher guides, the used of positive classroom management techniques and real-time monitoring of lessons.

41. The Program aims to carry out a range of reforms and strategic interventions, including: (i) leveraging technology to equip government to harness data intelligence to drive planning while building institutional capacity to use data, (ii) using technology to deliver quality real
time content to teachers and training them to effectively manage teaching and learning using classroom data collected in real time, (iii) using technology to drive efficient quality assurance systems and helping to build the frameworks to support teaching and learning, and (iv) supporting non-teaching staff in their role, particularly for reporting and documentation.

42. In primary schools, Edo State has been implementing the Edo BEST program to improve teacher effectiveness and learning outcomes in 80 percent of primary schools in the State. The remaining 20 percent of primary schools tend to be the hardest to reach due to remoteness, lack of capacity and other constraining factors. The proposed Program will support the roll-out to all remaining primary schools in the state.

43. In junior secondary schools, the Program will support the design, pilot and expansion of a range of integrated strategic interventions to improve teacher effectiveness. They will involve extensive preparation activities involving (i) a school census, (ii) a teacher, student and school resource evaluation, (iii) syllabus/curriculum evaluation and preparation\(^1\), (iv) development, production and distribution of instructional materials, (v) school leadership capacity evaluation, (vi) adaptation/development of training/coaching systems, (vi) Implement induction training, (ix) community engagement, and (x) building a support team. The rollout to schools will include an initial phase that will include at least 30 schools, followed by subsequent cohorts that is expected to reach all Edo junior secondary schools within three years. Extensive monitoring and evaluation of the program will be conducted as part of a feedback loop for continuous improvement.

44. The key elements of the reforms and interventions are presented in the following sub-results areas:

**Sub-results area 1: Strengthened governance and institutional framework**

45. Under this sub result area, the program will strengthen core institutional and governance activities. Planning and budgeting will be strengthened as part of the development and implementation of a Basic Education Management Information System (BEMIS). The system will be designed to provide key information for use in the planning and budgeting process. The BEMIS system will also support performance monitoring of the education system, including school level and administrative elements. Key Performance Indicators (KPIs) will be defined and tracked to identify which areas of the education system are performing well and which require improvement.

**Sub-results area 2: Improved teacher development and curriculum**

46. This sub-results area will include a set reforms and strategic interventions focusing on pre-service teacher training, in-service teacher training and support, and curriculum development.

47. *For pre-service reform*, the Quality Assurance process will be critical in ensuring the new National College of Education (NCE) programs meet minimum standards and are able to become accredited. The Program will support the establishment and functioning of the Quality Assurance process.

48. *For in-service teacher and support*, the program will support the following strategic

\(^1\) A key focus of this would be to strengthen vocational education elements in the secondary school curricula as the state sees it as critical to the development of entrepreneurship and self-reliance among young Nigerians.
interventions: (i) rollout of Edo BEST to junior secondary schools and (ii) Roll-out to the remaining 20 percent of primary schools that have not yet implemented the Edo BEST primary school model.

49. *For curriculum development*, the program will support syllabus evaluation and preparation.

**Sub-result area 3: Strengthened community participation and partnership**

50. This sub-results area aims to strengthen school-based management capacity and community participation and School Based Management Committee (SBMC) development. The Program will support the development and rollout of a school-based management capacity (SBMC) development that will serve to build awareness and support for education reforms at the community level and allow for support and monitoring of the program through the community.

**Sub-result area 4: Enhanced organizational Effectiveness at SUBEB and LGAs**

51. Under this sub-results area, the Program will support organizational strengthening that will promote efficiency, effectiveness and sustainability. Long-term sustainability of Edo BEST will require capacity building of SUBEB personnel, particularly in order to take over key responsibilities that are currently undertaken by the technical firm. The capacity building and transition process has already begun, and the Program will continue to support this transition. The sub-results area will also support SUBEB’s move to a more technology enabled workplace.

52. *Result area 1 is summarized in the 5 pillars of Edo BEST* as illustrated in Figure 2.5 below. The key activities that the Program will support is in bold.

**Figure 2.5: Pillars of EdoBEST**

<table>
<thead>
<tr>
<th>Pillar 1</th>
<th>Pillar 2</th>
<th>Pillar 3</th>
<th>Pillar 4</th>
<th>Pillar 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Governance and Institutional Development</td>
<td>Teacher Development and Curriculum</td>
<td>Community Participation and Partnerships</td>
<td>School Infrastructure</td>
<td>Organizational Development for SUBEB and the 18 LGEAs</td>
</tr>
<tr>
<td>• Education policies and Strategy</td>
<td>• Pre-Service Teacher Development</td>
<td>• Community Participation &amp; SBMC Development</td>
<td>• School Infrastructure</td>
<td>• Workforce Management</td>
</tr>
<tr>
<td>• Planning and Budgeting</td>
<td>• In-Service Teacher Development</td>
<td>• CSO-CGP Development</td>
<td>• Inclusive Sports &amp; Recreation</td>
<td>• Training and capacity building</td>
</tr>
<tr>
<td>• Performance Monitoring</td>
<td>• Teaching Management System</td>
<td>• Civil Society and Private Sector Partnership</td>
<td>• Accessible School Health Facilities (universal access)</td>
<td>• Technology enabled workplace</td>
</tr>
<tr>
<td></td>
<td>• Head Teacher training</td>
<td>• Disabled people’s organizations</td>
<td></td>
<td>• Using quality disaggregated data to drive decision making</td>
</tr>
<tr>
<td></td>
<td>• Quality Assurance</td>
<td>• Inclusive Education for all</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 24 of 105
2.3.2 Results Area 2: Improved access, quality and relevance of digital skills and entrepreneurship training

53. This Results Area consists largely of supporting expansion of *Edo Innovates* program. An increasing number of youths are acquiring digital skills, yet they remain unable to gain employment mainly because these digital skills are not market relevant. Universities, vocational schools and in some instances innovation hubs in Edo State offer outdated digital skills training that do not meet the private sector needs or demands. Oftentimes, private sector companies are forced to re-train employers to meet their objectives. Attracting private sector partners is core to the Edo Innovates programme however this can only be achieved with a clear institutional and governance framework that creates an enabling environment for private sector participation. This framework is currently lacking in Edo as the Edo Innovates hub is currently managed by a Hub Manager under the Edo Skills Development Agency. It is essential that a governance and institutional framework is developed and established for Edo Innovates to ensure that digital skills development and innovation is aligned with the State Government’s goals, resources and decision-making process. The absence of e-learning platform limits access to the digital skills programme. Currently the digital skills training is only available to youth who are able to access the Edo Innovates hub. Those who are limited by geographic, disability, and gender related cultural issues are unable to take advantage of the digital skills training programmes which may also be limited by space and accessibility.

54. Despite significant progress under Edo Innovate to expand access to digital skill training, the current system is inadequate to provide market-relevant skills training for youth. To enhance the quality and relevance of digital skills training, the Program aims to carry out a range of reforms and strategic interventions focused on governance reforms and the provision of market-relevant skills training programs. The key elements of the reforms are presented in the following sub-results areas.

*Sub-results Area 2.1: Strengthened management and governance structure for Edo Innovates Hub*

55. The objective of this sub-area is to establish and strengthen the institutional and governance framework for the Edo State Innovates Hub. A clear institutional framework and governance structure is essential for the Edo Innovates hub to ensure that digital skills development and innovation is aligned with the State Government’s goals, resources and decision-making process. Furthermore, the absence of e learning platform limits access to the digital skills programme. Institutional and governance set up will include the a) establishment of governance board to provide strategic, policy and reform guidance as well as competitive grant selection awards for the innovation hubs; b) restructuring of the Edo Innovates hub, and c) the establishment of two new digital innovation hubs across the state. These hubs will be managed in partnership with the private sector for sustainability, curriculum relevance and maintain industry linkages; a) establishment of an agency for online work with global freelancing platforms and b) Support to Government on necessary policy reforms to support the growth of the digital ecosystem.
Sub-results Area 2.2: Improved Access to Quality and Market Relevant Digital Skills Training

56. The objective of this sub-result area is to empower the youth of Edo state by equipping them with digital skills and digital entrepreneurship to leverage digital technologies to drive innovation, entrepreneurship, digital startups and job creation. The ultimate aim is to develop the digital leaders of tomorrow who will utilize digital tools and solutions to contribute to the development of the digital economy by innovating to create and sustain markets and address development challenges. startups. The digital skills result area will support institutional and governance set up, policy reform and training implementation arrangements. Key principles will be considered including funding model and fund-raising strategy, balance between disruptive innovative and market creating innovation, the establishment of governance structures to ensure alignment with the innovation hubs goals and to encourage PPPs, resources and decision-making process, development of clear innovation strategies, purposes and goals, identification of clear innovation tools, development of a diverse community, creation of jobs and businesses, development of robust curriculum that reflects private sector demand, delivery of high-quality digital skills training, soft skills training and creation of online work agencies.

57. This Program will support narrowing the gender and disability divide for digital skills. A key part of the digital skills programme especially for women and people with disabilities is the provision of soft skills training to ensure well rounded youth who can communicate, be team players and be able to sell their products or services.

58. Implementation arrangements for skills training include: a) curriculum development and training delivery with the private sector to ensure linkages with industry and relevance of content b) design of digital skill and entrepreneurship training programme in partnership with the private sector c) private sector partnerships for jobs, venture capitalist and internships d) train the trainer model to develop the local eco system e) competitive grants for entrepreneurs and innovators and f) establishment of a Learning Management System (LMS) for the online administration and management of courses, curriculum and performance assessment and g) launching of e learning platforms to increase the scope and access to the digital skills training.

59. The budget for the Program is estimated at US$287 million over the 2020 to 2024 period, of which IDA financing would be US$75 million, or 26 percent of the Program budget. The specific expenditure categories included in the Program are goods and services, the wage bill, and capital expenditures. The activities under the Program will be funded from the budgets of SUBEB, Ministry of Education, and the Skills Development Agency. The Program will include expenditures for junior secondary teachers’ salaries, training, school grants, accessible teaching and learning materials, goods, consultant services, operational expenditures and modest accessible construction works. For the skills development results area, it will include expenditures for digital equipment, ICT and digital skills trainings and certifications, start-up grants.

Excluded Activities

60. The Program will exclude activities that do not meet World Bank policy on eligibility for PforR financing. Specifically, the borrower shall ensure that the Program excludes any activities which, in the opinion of the World Bank, are likely to have significant adverse
impacts that are sensitive, diverse or unprecedented on the environment and/or requires significant land acquisition / resettlement of affected people, as defined in the World Bank policy on PforR financing, as well as works, goods and consultancy contracts above the Operations Procurement Review Committee Thresholds. The World Bank will support Program execution to ensure compliance with PforR policy requirements during implementation. As the focus of the PforR is on supporting Edo State systems, the exclusion of the above activities will not impact the achievements of the results under the Program.

2.4 Disbursement Linked Indicators

61. The Program includes seven Disbursement Linked Indicators (DLIs) that have been selected for their high relevance and capacity to positively impact the achievement of the objectives of the Program. These DLIs were selected through extensive consultations with the government. The summary of the Disbursement Linked Indictors for the Edo Basic Education Sector and Skills Transformation Program PforR is presented in Table 2.2.
## Table 2.2: Summary of Disbursement Linked Indicators for Edo Basic Education Sector and Skills Transformation Program (PforR)

<table>
<thead>
<tr>
<th>DLI</th>
<th>Definitions</th>
<th>Amount in US$</th>
</tr>
</thead>
<tbody>
<tr>
<td>DLI 1: Proportion of Primary schools implementing EdoBEST for improved quality and accountability</td>
<td>The DLI will support the continued expansion and continuation of the program, as well as its evaluation and continual improvement. It will focus on increasing the number of primary schools implementing EdoBEST using technology-enabled scripted lessons, teacher management, quality assurance and learning materials available and accessible for all students, increased learning outcomes in literacy and numeracy for primary school pupils.</td>
<td>$15m</td>
</tr>
<tr>
<td>DLI 2: Proportion of JSS implementing EdoBEST for improved quality and accountability</td>
<td>This DLI will focus on increasing the number of JSS implementing Edo BEST. The DLI activities are designed to support from development through implementation and evaluation. The initial activity ensures that a quality program is developed, including syllabus evaluation and preparation, development and production of instructional materials, training programs for teachers and principals, and quality assurance and evaluation programs. This is followed by a comprehensive pilot that includes treatment and control groups to determine the effectiveness and inclusivity of the model and identify areas for improvement. This is followed by scaling up to all junior secondary schools and further evaluation.</td>
<td>$15m</td>
</tr>
<tr>
<td>DLI 3: Development and implementation of EdoBEST@Home program to support students outside school</td>
<td>The DLI will support the development of remote learning programs which offer opportunities to improve the overall education systems by providing remedial and scaffolding support to students outside school (especially those with low achievement) and reaching out of school students by providing the ability to learn anywhere, anytime. In addition, the development and integration of remote learning builds resilience into the system to continue educational delivery in the event of pandemic or natural disaster leading to some or all schools closing such as that occasioned by COVID-19.</td>
<td>$10m</td>
</tr>
<tr>
<td>DLI 4: Development and implementation of BEMIS system with use in key management functions</td>
<td>The DLI will support design and development of the Basic Education Management Information System (BEMIS), followed by integration of its use for management and decision-making purposes. The DLI will also support the design of a new reward and accountability system with career progression and promotion scheme.</td>
<td>$5m</td>
</tr>
<tr>
<td>DLI 5: Development and implementation of a Learning Assessment Strategy and System</td>
<td>The DLI will support development of learning standards, particularly for key stages of Primary 3, Primary 6 and Junior Secondary 3 in literacy and numeracy. A detailed learning assessment strategy is to be defined that includes how students in Edo will be assessed, method of ensuring comparability of results across years, the method for sample selection, frequency, key dimensions for analysis (e.g. gender, urban/rural, disability, etc.), how results will be analyzed and disseminated, and use of results in decision making to improve teaching and learning.</td>
<td>$5m</td>
</tr>
<tr>
<td>DLI 6: Quality assurance and accreditation of pre-service programs</td>
<td>This DLI is focused on ensuring that high quality, inclusive programs are implemented and eventually accredited. The activities revolve around a system of quality assurance, where the COEs will form Quality Assurance units, undertake the comprehensive QA self-assessment using the QA toolkit developed by NCCE, which is designed specifically to evaluate the programs in relation to obtaining accreditation and identify gaps and areas for improvement. The DLI also focuses on undergoing program accreditation and require that the programs obtain at least provisional accreditation. Key supplementary activities that will be undertaken following the Teacher Development Programme (TDP) will also be supported through the DLIs: (i) a continuous professional development certification (CPDC) program will be implemented to ensure teacher educators understand the new inclusive programs and methodologies and (ii) the formal establishment of linkages and partnerships between the MOE, SUBEB, the new COE and the EdoBEST Schools. The final DLI activity is tied to the outcome of producing graduates from the new programs.</td>
<td>$5m</td>
</tr>
<tr>
<td>DLI 7: Establishment of a Board of Directors to provide strategic, policy guidance including establishment of PPP model to encourage and support private sector participation in training delivery at innovation hubs</td>
<td>This DLI is essential to ensuring that EDSG promotes good governance, encourages private sector participation and implements high-quality digital skills and digital entrepreneurship training programmes. This DLI will lead to the establishment of partnerships to leverage the resources and expertise of global and regional tech companies, foundations, and innovation networks to attract new skills development and entrepreneurship programs to Edo State.</td>
<td>$10m</td>
</tr>
<tr>
<td>DLI 8: Delivery of market relevant digital skills and digital entrepreneurship trainings</td>
<td>This DLI is the core of this results area. This DLI will ensure that the curriculum and content of digital skills entrepreneurship training programs meets the skills gap and is aligned with private sector needs.</td>
<td>$5m</td>
</tr>
</tbody>
</table>
SECTION III: PROGRAM CONTEXT

3.1 Country and State Context

62. Nigeria continued its recovery from the 2016 recession, recording an estimated 2.2 percent growth rate in 2019. The collapse of global oil prices during 2014–16, combined with lower domestic oil production, led to a sudden slowdown in economic activity. Nigeria’s annual real GDP growth rate, which averaged 7 percent from 2000 to 2014, fell to 2.7 percent in 2015 and to -1.6 percent in 2016. Growth rebounded to 0.8 percent in 2017, improved to 1.9 percent in 2018, and further to an estimated 2.2 percent in 2019. The recovery, earlier expected to remain slow due to continued weak economic diversification and productive investments, is now expected to reverse, due to the impact of the Corona Virus Disease (COVID-19) epidemic on Nigeria’s fiscal and external positions, with real GDP growth now projected to hover around 1 percent over the medium-term.

63. With population growth (estimated at 2.6 percent) outpacing economic growth in a context of weak job creation, per capita incomes are falling. Today, an estimated 100 million Nigerians live on less than US$1.90 per day. Close to 80 percent of poor households are in northern Nigeria, while employment creation and income gains have been concentrated in central and southern Nigeria. Unemployment is high (23 percent), with a further 20 percent of the labor force under-employed. Nigeria’s economic and demographic outlook makes job creation an urgent task.

64. The Federal Government has been implementing an Economic Recovery and Growth Plan (ERGP) from 2017 and is expected to continue through 2020. The ERGP set out to restore macroeconomic stability in the short-term and to undertake structural reforms, infrastructure as well as human capital investments to diversify the economy and set it on a path of sustained inclusive growth over the medium- to long-term. It had an ambitious target of achieving 7 percent real annual GDP growth by 2020, to be initially driven by the oil sector and then increasingly by strong non-oil sector growth. Among other things, the ERGP recognizes that the shifts in the global economy, the emergence of new sectors and the digital revolution have changed the skills required of the work force and that Nigeria has to reposition its education sector to prepare its young people to cope with the changing technological and economic environment. Thus, the ERGP aims to ensure quality universal education for Nigerian children and youth, increase the number of youth and adults with the skills required to secure employment and/or become entrepreneurs and prioritize education for girls.

65. Currently, Nigerian children lag their peers in human capital formation—as measured by the World Bank’s Human Capital Index (HCI)—suggesting that the future productivity of the labor force is at risk. The HCI measures the amount of human capital that a child born today can expect to attain by age 18. It conveys the productivity of a country’s next generation of workers compared to a benchmark of complete education and full health. According to the HCI, a child born in Nigeria today will be 34 percent as productive when she grows up as she could be if she enjoyed complete education and full health. In the HCI, Nigeria ranks low at 152 out of 157 countries. To address these alarming HC challenges the Government has made an urgent Call for Action which includes (i) supporting a differentiated results-based approach by states to address human capital (HC) challenges (ii) fostering a national
dialogue around potentially sensitive topics including demography, teacher reform, and
careers’ empowerment and (iii) using technology and working with non-state actors to
implement at scale. The World Bank has committed to support the Government’s Call for
Action on HC, which includes empowering States, like Edo, to identify and implement high
impact results-based programs aimed at improving their most pressing education health
outcomes.

66. Edo State is one of thirty-six Nigerian states and is in the south-south region of the country
with an estimated population of 4.6 million, about half of which are young people under 30
years of age. Over the last decade, the State demonstrated practical commitment to economic
reform and improved service delivery as it launched multiple economic, social and structural
reforms from 2009, and was thus selected by the World Bank in 2010 as the second
subnational in Nigeria for a Development Policy Financing (DPF) engagement. In addition
to efforts to overhaul its infrastructure (particularly schools and roads - including
construction of an urban storm water drainage system), the State embraced extensive fiscal
and public financial management (PFM) reforms (budget management, cash management,
payroll sanitization and expenditure control, tax administration and public procurement) and
land administration reforms (set-up of a Geographic Information System for land
management and reduction in land transaction fees); resulting in better public service
delivery and stronger development outcomes in Edo State.

67. The Government of Edo has outlined its vision and strategy for further reform and
transformation in an Edo State Development Plan, 2017-2020 (updated for 2020-2024). This
was sequel to it identifying the key outstanding development challenges faced by the State.
Amongst the key challenges identified were high youth unemployment and
underemployment (15.3 percent and 19.3 percent, respectively). Thus, one of the
government’s key goals was to create more and better jobs for its youth and reduce its
peculiar irregular migration problem. The government’s expressed vision is “To develop a
modern and progressive Edo State where every citizen is empowered with opportunity to
live life in its fullness”. While the government embarked on initiatives to enhance the
business environment and promote investments in the State in order to boost job creation, it
simultaneously recognized that there was a strong need to build the requisite human capital
to feed the current and future labor markets given the significant, observable deficiencies in
the quality of foundational education and advanced skills delivery in Edo State. Thus, human
capital development (and in particular, education and skills development) was placed at the
heart of Edo’s vision and strategy.

68. In framing its education and skills development agenda, Edo State government, was mindful
of the need to focus on both foundational education as well as mid-level and advanced skills,
all required to build a modern work force. Drawing from the Social Welfare Enhancement
Pillar of its State Development Plan, Edo State government has developed a Basic Education
and Skills Development Program (BESDP) that consists of its plans to reform the delivery
of basic education and job-relevant skills at the post-basic level to enable easy transition of
youths to the labor market. It recognizes that a comprehensive focus on improving the
acquisition of foundational education and skills will increase the pool of productive workers
for industry and enhance the chances that labor market entrants will transition into good jobs.
Thus, the two areas of focus in the BESDP are Basic Education and Skills Development for
youth (with an emphasis on digital skills which is seen as critical for the rapidly-changing
world of work).

### 3.1.2 Sectoral (or Multi-Sectoral) and Institutional Context

69. Quality education and skills development are fundamental elements of the human capital development required by developing economies like Nigeria. They are key drivers for reducing poverty, fostering economic growth, achieving gender equality and social development. Basic education is a critical foundation for building other levels of professional qualifications and skills. This includes senior secondary, middle-level technical and vocational qualifications, advanced university degrees, as well as lower-level skilled and semi-skilled craftsmanship. This implies that countries require a balanced, multi-faceted education and skills development system that combines education and training at basic and secondary levels, technical and vocational education and training (TVET) institutions, universities, as well as a recognition of less formal skills development. Furthermore, in the 21st century, with technology reshaping the skills needed for work, professionals at all levels need to be digitally literate and acquainted with the dynamics of modern technological progress. The global use of technology has not only broadened the scope of skills needed, but also changed the way jobseekers can connect to the labor market. Digital skills can empower and create new opportunities for persons who have difficulties in accessing traditional job markets, notably women and persons living with disabilities.

70. Nigeria’s education and skills development system combines education and skills training at the various levels. It is managed by the three tiers of government - federal, state, and local - with both the public and private sectors as service providers. Education is organized along the lines of a 1-6-3-3-4 system: first, is basic education which consists of one pre-primary year, six years of primary, and three years of junior secondary education. The next three years are senior secondary education, followed by four years of tertiary education. Basic and senior secondary education remain mostly under the jurisdiction of the state and local governments, while the Federal Government is responsible for the administration of federally-owned universities and Federal Unity Colleges that were set up to serve as model secondary schools. The Federal Ministry of Education (FME) has a policy formulation and coordination mandate, the National Council on Education (NCE) coordinates policy making across the different tiers of Government, and the Universal Basic Education Commission (UBEC) is the executive agency of the Federal Government responsible for basic education policy implementation. The skills development system is multi-pronged and differentiated: while universities, polytechnics and specialized colleges and institutions offer formal tertiary education to train professionals and technicians, the skills development space at lower levels is more diverse. It comprises mainly: (i) formal TVET, provided as part of the formal secondary education system in Technical Colleges (TCs) and Vocational Enterprise Institutions (VEIs); (ii) job-related non-formal training, often of shorter duration, serving various segments of the labor market; and (iii) informal apprenticeship training provided in the informal economy. A differentiated institutional framework governs and manages the different skills sub-systems, comprising institutions such as the Federal Ministry of Education (FME) with its Technology and Science Education Department (TSED), state-level TVET agencies, the National Board of Technical Education (NBTE), the Industrial Training Fund (ITF) and others.

71. In Edo State, education and skills development is multi-faceted and is managed by state-level Ministries, Departments and Agencies (MDAs). These MDAs include: (i) Edo State Ministry
of Education (SME), which is responsible for the formulation of education policy for the state as well as management and supervision of all educational institutions; (ii) the State Universal Education Board (SUBEB) which is responsible for basic education policy implementation in the state; (iii) Post-Primary Education Board (PPEB) – responsible for monitoring and supervising teachers/learning activities at the Senior Secondary School level in the state; (iv) Board for Technical and Vocational Education (BTVE), responsible for the oversight of formal Technical and Vocational Education & Training (TVET); (v) Directorate for Adult and Non-Formal Education (under the Ministry of Education) – responsible for the oversight of non-formal adult education programs; (vi) State Library Board – responsible for the promotion of a reading culture among the people of the State and establishment and management of public libraries; and (vii) Skills Development Agency, established in 2018 and responsible for promoting and coordinating all activities relating to non-formal skills development in the state.

72. Edo State, like much of Nigeria, has a challenging education and skills development backdrop. Earlier government administrations in Edo State focused most of their reform efforts in the education sector on improving school infrastructure, enrolments and attendance. Thus, while Edo State has significantly expanded access to education and closed gender gaps (see Table 1), quality of education has remained weak. The low quality of education delivery in Edo State has resulted in weak formation of modern workforce skills as the education system produces youths who do not have job-relevant skills. Consequently, unemployment and underemployment rates in Edo State were 22.2 and 18.8 percent, respectively, as of 2017 and reached 25.1 percent and 18.4 percent, respectively, by the third quarter of 2018. Many of Edo’s youths have over-time embraced illegal out-migration as a coping mechanism, with several migrating illegally to countries in Europe through North African routes (notably Libya) in search of better economic opportunities, while others have fallen victim to human trafficking under the guise of getting them employed in lucrative jobs abroad. Edo State accounts for the highest proportion of known irregular migrants from Nigeria as over 60 percent of migrant returnees from Libya in early 2018 were from Edo State. A survey of these Edo State migrants revealed that most are in the youth age bracket (15-34 years), seeking decent jobs and economic prosperity. Most of the returnees cited family pressure and economic reasons - lack of jobs at home in Edo State as key reasons influencing their decisions to migrate illegally. Some were also trafficked. As of 2017, the government found the following weaknesses in the education and skills development system, which were affecting the quality and effectiveness of education and skills delivery in Edo’s public schools/institutions and were having a more than proportionate effect on children from poor communities:

- **Weak governance, accountability and institutional oversight:** There were inadequate accountability and incentive mechanisms in the state. Institutional linkages from the state to district and sub-district levels for planning, monitoring and management of schools and teachers were deficient. The Inspectorate lacked adequate resources to monitor schools and teachers. Theoretically, each Local Government Education Authority (LGEA) has its own team of inspectors who are to collaborate with state-level MoE inspectors. In practice, this does not occur. Processes for monitoring teachers and evaluating their performance were also suboptimal, as inspections and evaluation processes were ultimately of little material consequence. Edo’s education system is structured to collect data about teachers but not to act on such data. Strong administrative and governance mechanisms are required for
effective management of teachers. Teacher management and monitoring systems that can link data on teachers with their training and professional development needs were lacking. Policy makers and teacher educators therefore were unable to use information to track and plan their teacher development/training strategy. The Directorate of Research and Training, the nodal agency for teacher education, was understaffed.

- **Inadequate budgeting and planning:** The budgeting process in the education sector was perfunctory, and there were no incentives to make it evidence-based or to justify or track expenditures. Senior DPRS officials were not scrutinizing submitted budgets, suggesting a lack of planning oversight. Staffing decisions were made with insufficient information about sector needs or available resources to meet those needs, leading to operational and human resource challenges. Educational Resource Centers (ERCs) are responsible for the planning and provision of instructional materials to all schools, but lack the necessary capacity, data and resources.

- **Teacher quality and effectiveness:** The system was characterized by overworked and poorly trained teachers using outdated teaching methods which fail to prepare the children for the requirements of the 21st century. Edo education policy has pursued the admirable goal of education for all in primary schools. These policies have been ineffectively operationalized, however, leading to overcrowded classrooms and the recruitment of untrained teachers. Due to these shortcomings, the profession has come to be viewed as an ‘all-comers job’, negatively influencing public perceptions of teachers. Many teachers, therefore, feel unsupported, underappreciated, and pressured by unrealistic expectations. Teacher absenteeism was high and there was no mechanism to ensure teachers were in school. Very little professional development was given. The ERCs are intended to manage teacher training, with a focus on educational technology, but have lacked the resources and capacity to do so.

- **Poor School Leadership:** In order to guide the process of enlisting and guiding the talents and energies of teachers, pupils, and parents toward achieving common educational aims, school leadership programs can play a vital role. A school principal has many tasks, including finances, managing teachers, and engaging communities/parents in the education system. Heads of schools in Edo lacked the skills necessary to manage schools better, interact with the parents/community for the necessary stakeholder consultations and help teachers improve student learning. School leadership programs have been undertaken to effectively link head teachers to the school development and teacher empowerment processes.

- **Infrastructure:** Despite previous efforts, school infrastructure across the state remains sub-optimal and inadequate. Many primary schools and junior secondary schools are old, with dilapidated buildings, leaking roofs, cracked walls, sagging ceilings, and broken windows; facilities such as library resources as well as computer and science laboratories are inadequate; number of classrooms are insufficient, leading to over-crowding; there is a lack of school buses in most schools (only 5 percent of schools have a school bus or vehicle).

- **Quality data to drive decision making:** The Department of Planning, Research, and Statistics (DPRS) faced numerous challenges, beginning with the lack of channels to collect and share data with other MoE offices and key sector stakeholders. The Department was lacking data on teachers other than the number in each school and their genders—and even
the quality of that information is suspect. This data deficit stems from an absence of mechanisms that allow the Department to enforce the completion of the census forms.

- **Systems of Information and communication:** There was a lack of structured, regular means of communications between key education officials and the institutions they represent, impeding knowledge sharing in the public education system. The public education system in Edo had few functional mechanisms to ensure its various initiatives are delivering on their stated objectives. Project timelines are irregularly adhered to, staff performance metrics are non-existent or not enforced, and job performance and correlated results are not systematically measured and monitored.

- **Use of technology:** Technology has typically been very limited in both administrative and educational aspects, is seen in Edo to have great potential for ICTs to support the delivery of quality education in Edo. A key benefit of integrating ICTs into programmatic efforts is the dialogue it facilitates. Given Edo’s recent advances in open government, and the Directorate of Information and Communication Technology (DICT’s) role in building the Education Management Information System (EMIS), the use of technology for use in addressing many system issues mentioned above. Still, the EMIS has been limited and technology has not (until recently) been integrated into the classroom.

- **System to increase the supply of quality teachers:** The teacher education system in Edo was dysfunctional. The Colleges of Education (COEs) in Edo have not been fully operational in recent years and have not been producing the teachers needed to support quality basic education in the state. The programs of the COEs are mostly unaccredited and are not in line with the NCCE’s recent curriculum reforms. The educational instructors are not trained to deliver new pedagogical approaches. The government envisions to develop the State Universities into world-class institutions; and train teachers to meet the 21st century requirements.
Table 3.1: Edo State Education Indicators

<table>
<thead>
<tr>
<th>Education Indicator</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net Attendance Ratio (Primary) (%)</td>
<td>91.4</td>
</tr>
<tr>
<td>Out of School (Primary) (%)</td>
<td>8.6</td>
</tr>
<tr>
<td>Net Attendance Ratio (Secondary) (%)</td>
<td>78.9</td>
</tr>
<tr>
<td>Out of School (Secondary) (%)</td>
<td>4.9</td>
</tr>
<tr>
<td>Primary School Entry (%)</td>
<td>66.7</td>
</tr>
<tr>
<td>Primary School Completion Rate (%)</td>
<td>70.4</td>
</tr>
<tr>
<td>Transition Rate to Secondary School (%)</td>
<td>64.2</td>
</tr>
<tr>
<td>Percent who reach grade 6 of those who enter grade 1(%)</td>
<td>100.0</td>
</tr>
<tr>
<td>Gender Parity Index (Primary)</td>
<td>1.0</td>
</tr>
<tr>
<td>Gender Parity Index (Junior Secondary)</td>
<td>1.0</td>
</tr>
</tbody>
</table>

Source: MICS 2016-2017

73. The low quality of education delivery in Edo State resulted in weak formation of modern workforce skills as the education system produces youths who do not have job-relevant skills. Consequently, unemployment and underemployment rates in Edo State were 22.2 and 18.8 percent, respectively, as of 2017 and reached 25.1 percent and 18.4 percent, respectively, by the third quarter of 2018. Many of Edo’s youths have over-time embraced illegal out-migration as a coping mechanism, with several migrating illegally to countries in Europe through North African routes (notably Libya) in search of better economic opportunities, while others have fallen victim to human trafficking under the guise of getting them employed in lucrative jobs abroad. Edo State accounts for the highest proportion of known irregular migrants from Nigeria as over 60 percent of migrant returnees from Libya in early 2018 were from Edo State. A survey of these Edo State migrants revealed that most are in the youth age bracket (15-34 years), seeking decent jobs and economic prosperity. Most of the returnees cited family pressure and economic reasons - lack of jobs at home in Edo State as key reasons influencing their decisions to migrate illegally. Some were also trafficked.

74. The Government of Edo, in a bid to tackle the high unemployment/underemployment and irregular migration problem, has prioritized education quality and skills development for its young population. It thus carved out an Education and Skills Development Program from its State Development Plan under which it has outlined a strategy to significantly strengthen the quality of foundational (basic) education as well as improve access and quality of technical skills for youths to enable them transition readily into the job market. This consists of formal technical and vocational education and training (TVET) as well as rapid and informal upskilling technical and vocational programs. Because of the realization that technology reshaping the skills needed for work, it has further prioritized digital skills and entrepreneurship training for youth in the package of rapid upskilling programs. It has committed significant amounts of its own budgetary resources to basic education sector reform, TVET reform and digital skills, entrepreneurship and innovation development since 2017.

75. The Government of Edo plans to expand its interventions in basic education, TVET and digital skills, entrepreneurship and innovation. It has requested for Bank technical and financial support for this. This PforR Program aims to support the Government of Edo’s
efforts to improve basic education and digital skills development, as another pipeline Bank
operation - Innovation Development and Effectiveness in the Acquisition of Skills Project
(IDEAS) is to support Edo and five other Nigerian states to improve the delivery of TVET.

76. The landscape for skills development (i.e. rapid upskilling vocational programs) is somewhat
disorganized and unstructured in Edo. However, while the digital skills and innovation space
in particular is nascent, active strides are being made to create opportunities for digital skills
training and job creation through innovation. The State Government has kick started the
growth of the innovation space by establishing tech hubs, tech startups and tech programmes.
To date, the Government owns the biggest tech hub in Edo State and continues to show its
commitment by providing grants to start ups with the most recent grants being issued in
November 2019. Whilst Lagos and Abuja have the highest concentration and focus in the
innovation space, Edo State is actively taking strides to become a tech hub as well. However,
thus far, it is not so clear, how much the digital skills and incubation trainings being offered
are resulting in job creation and employment. The Government has recognized the
importance of leveraging private sector participation to improve the quality of the programs.
Currently, the lack of a framework to attract private sector is significantly impacting the
structure of their involvement. Considering the high youth population seeking employment,
leveraging technology for e-learning platforms is also essential for the youth to access these
trainings.

77. Edo State government recognizes that higher and more efficient investments in the quality
of foundational education and skills are necessary to enable Edo boost employability
amongst its youth and harness the demographic dividend. It thus carved out a Basic
Education and Skills Development Program (BESDP 2020 -2024) from its Development
Plan (with a keen focus on Basic Education and Digital Skills). The priority placed on Basic
Education and Digital Skills by the ESS led the State to launch two flagship initiatives - a
Basic Education Sector Transformation (Edo BEST) program in April 2018 and a Digital
Skills, Entrepreneurship & Innovation program (‘Edo Innovates’) in June 2018. The
Government of Edo has requested the Bank’s technical and financial support to implement
its BESDP from 2020-2024 and in particular, its Edo BEST and Edo Innovates initiatives
SECTION IV: POTENTIAL ENVIRONMENTAL AND SOCIAL EFFECTS

4.1 Overview of Program Risks and Benefits

78. The PforR is multi-pronged program with the aim of improving systems linked to the Edo State’s Education and Skills Reform Program. Given its proposed activities and target, the Program has the capacity and potential to generate positive outcomes and benefits especially social benefits that will result from improved quality of education and enhanced delivery of digital skills. The overall objective of the program is to improve teaching and learning conditions in basic education and expand access to digital skills and digital entrepreneurship development by youth in Edo State.

79. There are no direct physical works involved in this Program thus the environmental risk is limited. Table 4.1 below includes a description on the range of key environmental and social risks and benefits that are connected to the PforR.
<table>
<thead>
<tr>
<th>DLI</th>
<th>Environmental Benefits</th>
<th>Environmental Risks</th>
<th>Social Benefits</th>
<th>Social Risks</th>
</tr>
</thead>
</table>
| **DLI1:** Proportion of primary schools implementing EdoBEST for improved quality and accountability | Negligible | • Generation of e-waste | • Increased school enrolment  
• Enhanced student learning outcome  
• Reduced school dropout rate  
• Social Accountability  
• Job creation  
• Economic growth | • Vulnerable children may be affected, for example, they may be denied access to education materials (text books and home-work book). |
| **DLI2:** Proportion of JSS implementing EdoBEST for improved quality and accountability | Negligible | • Generation of e-waste | • Increased school enrolment  
• Enhanced student learning outcome –  
• Reduced school dropout rate  
• Social Accountability  
• Job creation  
• Economic growth | • Vulnerable children may be affected, for example, they may be denied access to education materials (text books and home-work book). |
| **DLI3:** Development and implementation of EdoBEST@Home program to support students outside school | • | • Ensure accessibility to education and inclusion  
• Encourage and enhance student learning | | • Vulnerable and students with disability may be excluded if the program does not take into consideration their need |
| **DLI 4:** Development and implementation of BEMIS system with use in key management functions | Negligible | • Negligible | • Enhanced school management  
• Enhanced educational outcomes  
• Economic growth | • Negligible  
• Children with disabilities might not be accounted for, therefore, their needs not being taken into account |
| **DLI 5:** Development and implementation of a Learning Assessment Strategy and System | Negligible | Negligible | • Transparency in student’s assessment  
• Enhanced learning outcomes  
• Job creation  
• | | • Negligible  
• Children with disabilities might not receive the individual supports they need to achieve their learning goals/job opportunities |
| **DLI 6:** Quality assurance and accreditation of pre-service programs | Negligible | Negligible | • Improved quality of teaching and teachers  
• Enhanced student learning outcome –  
• Reduced school dropout rate  
• Social Accountability  
• Economic growth | • Negligible  
• Potentially exclusion |
| **DLI 7:** Establishment of Board of Directors to provide strategic, policy guidance including establishment of PPP model to encourage and support private sector participation in training delivery at innovation hubs | Negligible | Negligible | • Job creation  
• Reduced crimes especially human trafficking and irregular migration  
• | | • Low  
• Elite capture  
• There is possibility of gender-based violence  
• There is possibility of workers health and safety issues due to PPP |
| **DLI 8:** Delivery of market-relevant digital skills and digital entrepreneurship training | Negligible | • Negligible | • Job creation  
• Job creation  
• Reduced crimes especially human trafficking and irregular migration  
• Economic growth | • Possibility of gender-based violence  
• Possibility of discrimination against vulnerable groups. |
4.2 Environmental Benefits

80. The environmental benefits of the PforR program are minimal.

4.3 Environmental Risks

Pollution and Waste Management
DLI 1: Primary schools implementing EdoBEST for improved quality and accountability;
DLI 2 Proportion of JSS implementing EdoBEST for improved quality and accountability

81. The Edo BEST program involves distribution of computers, tablets and other digital devices to teachers who are trained under the program and others that will participate in the program. Given the rate at which new devices are developed and old ones become unserviceable are discarded, these computers, tablets and digital devices will constitute e-waste and become a risk to the environment and persons if not properly handled. However, given that the quantity of e-waste is expected to be is small, the management would be consistent with international best industry practices and Basel convention on transboundary movement of hazardous materials. Specifically, the e-waste management under this project shall include, minimization, segregation, labelling, storage evacuation and disposal in government approval facility for handling hazardous wastes. In addition, there will be a manifest for tracking of the e-wastes to ensure that e-wastes collected arrive at the final disposal sites/facility.

Public and Worker Health and Safety
DLI 7: Establishment of Board of Directors to provide strategic, policy guidance including establishment of PPP model to encourage and support private sector participation in training delivery at innovation hubs

82. Public and Worker health and safety concerns relate to private sector involvement and job creation in Edo State as a result of the PPP model at the innovation hub. Concerns regarding public and worker health and safety also extend to the adequacy of protections under general labour laws and regulations including hiring practices, terms of employment, working conditions, etc. which are examined below under social risks.

Biodiversity and Ecosystems
83. Not applicable because this project is not expected to have any direct or indirect impacts on habitats or biodiversity that they support.

4.4 Social Benefits

Increased Social Spending
DLI 1: Proportion of primary schools implementing EdoBEST for improved quality and accountability; DLI 2: Proportion of JSS implementing EdoBEST for improved quality and accountability; DLI 6: Establishment of Quality assurance and accreditation of pre-service
84. One of the major features of the Edo State Development Plan is to enhance basic education and expand access to digital skills development. The P4R is supporting implementation of EdoBEST in basic education and the establishment of a PPP model to encourage and support private sector participation in training delivery at the innovation hub. The establishment of PP model will lead to increased government revenue especially from benefits that will accrue to the state from PPP. Also, the implementation of DLI 1 and 2 will result to improvement in social spending in education. Moreover, an increase in internally generated revenues would in turn allow Edo State to increase capital expenditures, with a focus on social sectors (e.g. health; education; women, youth and socially excluded sectors of the community).

Job creation and training
DLI 1: Proportion of primary schools implementing EdoBEST for improved quality and accountability; DLI 2: Proportion of JSS implementing EdoBEST for improved quality and accountability; DLI 4: Development and Implementation of Basic Education Management Information System (BEMIS); DLI 6: Establishment of Quality Assurance and Accreditation of Pre-service Programs; DLI 7: Delivery of Digital Skills and digital entrepreneurship training.

85. The P4Rs focus on improving teaching and learning conditions in basic education and expand access to digital skills development involving youth in Edo State. Giving the aim of basic education as outlined in the National Policy on Education which is to eradicate illiteracy, ignorance and poverty, improving teaching and learning will ultimately lead to the creation of more jobs. Also, the expansion of digital entrepreneurship and skill in the State will lead to creation of more jobs in the digital economy. Already and based on Edo State’s Skills Development Agency data, 77,200 jobs were created by November 2018 with a forecast of creating an additional 70,000 jobs in 2019, 75,000 in 2020 and 100,000 in 2021². In addition, with private sector participation in training delivery at the innovation hub, there will acquisition of more skills and ultimately, job creation.

Improved Education Outcome and Reduced Number of Out-of-School Children
DLI 1: Proportion of Primary schools implementing EdoBEST for improved quality and accountability; DLI 2: Proportion of JSS implementing EdoBEST for improved quality and accountability; DLI 3: Development and implementation of EdoBest at home program to support student outside school; DLI 4: Development and implementation of Basic Education Management Information System; DLI 5 Development and Implementation of a Learning Assessment, Strategy and System

86. Edo BEST initiative which Edo State government is partnering with a private firm, Bridge Technologies International, is using technology to enhance teacher performance. The program was launched with the aim to improve teacher (pre-service and in-service) performance giving the fact that teacher performance in inextricably linked with learning outcomes. Currently, under the program, the state has recorded marked improvement in

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² Based on a report from Edo State Skills Development Agency
literacy and numeracy level among pupils and teachers by teaching at the right levels. There has also been marked improvement in enrolment as according to Edo SUPEB, 2018-2019 pupil school enrolments scaled up to 20,000. Scaling up of the program especially with the delivery of learning materials to students that will be achieved in DLI 1 and 2 and enhanced school management and accountability that will be achieved in DLI 3, there will be further be further improvement in learning outcomes and increased enrolment which will also bring about reduction in the number of out-of-school in the State, reduced poverty and economic growth. Currently it is estimated that there are over 10 million out-of-school children in Nigeria.

4.5 Social Risks

87. The social risks have been linked to the Disbursement Linked Indicators (DLIs) and categorized by the 6 core principles of the PforR financing.

Land related risks

88. Given that none of the DLI’s is related to land acquisition and use, land related risks are not envisaged in the Edo State Basic Education Sector and Skills Transformation (EDOBESST) Program PforR.

Conflict

89. Given the DLI’s conflict are expected to be negligible.

Vulnerable Groups

DLI 1: Proportion of Primary schools implementing EdoBEST for improved quality and accountability; DLI 2: Proportion of JSS implementing EdoBEST for improved quality and accountability; DLI 7: Delivery of Market-relevant Digital Skills and digital entrepreneurship training

90. There are no groups in Nigeria that meet the World Bank’s criteria for Indigenous Peoples. Thus, this section has adapted Core Principle 5 to look at the systems that address the needs of vulnerable people, including ethnic minorities.

91. There are some vulnerable groups that warrant careful consideration in the context of implementing EdoBEST and digital skills and entrepreneurship training (DLI1, DLI2, and DLI7). These include women (especially the girl child), orphans and people with disabilities, and certain ethnic groups.

   o Girl Child: Although the Nigeria Policy on Education stipulates that access to education is a right for all Nigerian children regardless of gender, religion and disability, sometimes the girl child is discriminated against especially due to culture and social norms. For example, UNICEF indicates that over half of girls in Northern Nigeria are out of school. Thus, there could be discrimination of girls in the implementation of EdoBEST and in digital skills and entrepreneurship training. Besides, inadequate sanitation facilities and safety in schools which are not only health hazards for girls but could also affect school attendance of the girl child.

   o Out-of-School and Orphaned Children: Out-of-school children, orphaned and vulnerable children (OVC) may not have enough opportunity to benefit from the
Edo BEST initiative. Currently, the EdoBEST initiative does not take account of out-of-school children not minding that the primary school completion rate is 70% in Edo State.

-Children with Disabilities (can be doubly, triply marginalized with gender, ethnic, etc)

**Gender Based Violence and Sexual Harassment**

**DLI 8: Delivery of market-relevant digital Skills and digital entrepreneurship training**

92. There could be tendency of sexual harassment by teachers / instructors in the delivery of digital skills and in entrepreneurship training giving the large number of women, girls and young boys involved in the program. If people with disabilities are involved in the program, they need to be considered especially in terms of compounded marginalization.
SECTION V: OVERVIEW OF RELEVANT GOVERNMENT ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

5.1 Description of policy and legal framework

93. The government of Nigeria (GON) has a number of policies, instruments and laws which support environmental and social management and environmental and social impact assessment processes. There are a number of sectoral policies which provide directives to integrate environmental and social considerations in the decision-making process to avoid or minimize impacts associated with program implementation.

94. The government of Nigeria has signed the UNCRPD requiring people with disabilities to be included in all projects. The World Bank has committed to ensuring all education financed projects are disability inclusive by 2025.

5.1.1 Environmental Policy and Regulatory Framework

95. This sub-section describes the Government of Nigeria’s and Edo State's environmental management systems in relation to the core principles incorporated into the Bank Policy Program for Results Financing: (i) general principle of environmental and social impact assessment and management; (ii) mitigation of adverse impacts on natural habitats and physical cultural resources; and (iii) protection of public health worker safety.

Core Principle 1: Environmental and Social Impact Assessment and Management


96. The goal of the National Policy on the Environment is to ‘ensure environmental protection and the conservation of natural resources for sustainable development’. The strategic objective of the National Policy on the Environment is to coordinate environmental protection and natural resources conservation for sustainable development. This goal is meant to be achieved by the following strategic objectives:

a. securing a quality of environment adequate for good health and wellbeing; promoting sustainable use of natural resources and the restoration and maintenance of the biological diversity of ecosystems;

b. promoting an understanding of the essential linkages between the environment, social and economic development issues;

c. encouraging individual and community participation in environmental improvement initiatives;

d. raising public awareness and engendering a national culture of environmental preservation; and

e. building partnership among all stakeholders, including government at all levels, international institutions and governments, non-governmental agencies and communities on environmental matters.

97. The Federal Ministry of Environment (FMEnv) has taken over the functions of FEPA in administering and enforcing environmental laws in Nigeria. Other responsibilities of the ministry include:
a. Monitoring and enforcing environmental protection measures;

b. Enforcing international laws, conventions, protocols and treaties on the environment;

c. Prescribing standards for and making regulations on air quality, water quality, pollution and effluent limitations, atmosphere and ozone protection, control of hazardous substances; and

d. Promoting cooperation with similar bodies in other countries and international agencies connected with environmental protection.

**Environmental Impact Assessment Act (EIA) No. 86 f 1992**

98. The Act, which is a direct response to the outcome of the United Nations Conference on Environment and Development (UNCED) in Rio in 1992, outlines the goals and objective of an EIA, the minimum content of an EIA and a list of activities that are not permitted to go ahead until FEPA, now Federal Ministry of Environment has been consulted and has given its approval. The main aim of the Act is to ensure environmentally sound and sustainable development projects. The Act makes it mandatory for an EIA to be carried out for certain types of projects comprising various industrial, mining and petroleum activities. It categorized projects to indicate the level of analysis required. Category 1 projects indicates an expectation of significant environmental impacts and need to undertake a full EIA with a comprehensive report. These are project in environmentally sensitive areas, for example, coral reefs, mangrove swamps, tropical rainforests, areas with erosion soils, natural conservation areas etc. Category 2 indicates that a proposal may have impacts of a lesser magnitude that can be more readily mitigated. Here, some level of analysis is necessary depending on the type of impacts. This involves projects in agriculture and rural development, industry and infrastructure etc. Category 3 indicates that no adverse impacts are expected and that no EIA is needed, for example, nutrition programmes, education programmes etc. The EIA procedural guideline in Nigeria involves project proposal, initial environmental examination, screening, scoping, EIA study, review, decision making, monitoring and audit. Table 5.1 summarizes the other existing regulations applicable to environmental protection.

**Nigerian Environmental Management Act:**

99. This act was drafted following the amalgamation of the Federal Environmental Protection Agency into the Ministry of Environment but was never ratified. It repeals the 1988 Federal Environmental Protection Agency Decree No.58 (amended No.59 and No.14) and establishes the FEPA as part of the Ministry with the Minister of Environment having primary responsibility for its implementation. It does not repeal any other environmentally related legislation. As well as the general environmental provisions, which include environmental sanitation and occupational health, it specifies the powers of authorised officers, penalties and fines. The Act gives the Minister the authority to grant environmental permits for prescribed activities which includes sand mining but not any other mining activities.
National Environmental Standards and Regulations Enforcement Agency (NESREA) (Establishment Act, 2007)

100. The main aim of this act is to establish the National Environmental Standards and Regulations Enforcement Agency (NESREA). The agency has responsibility for the protection and development of the environment, biodiversity conservation and sustainable development of Nigeria’s natural resources in general and environmental technology, including coordination and liaison with relevant stakeholders within and outside Nigeria on matters of enforcement of environmental standards, regulations, rules, laws, policies and guidelines. Its key role is to enforce compliance with laws, guidelines, policies and standards on environmental matters including provisions of international agreements, protocols, conventions and treaties on the environment, namely climate change, biodiversity, conservation, desertification, forestry, oil and gas, chemicals, hazardous wastes, ozone depletion, marine and wild life, pollution, sanitation and such other environmental agreements as may from time to time come into force; enforce compliance with policies, standards, legislation and guidelines on water quality, environmental health and sanitation, including pollution abatement, among others.

101. To enhance environmental protection in Nigeria, some statutory provisions have been put in place:

102. Table summarizes the existing regulations applicable to environmental protection.

<table>
<thead>
<tr>
<th>S/N</th>
<th>Regulations</th>
<th>Year</th>
<th>Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Workmen Compensation Act</td>
<td>1987</td>
<td>Occupational health and safety</td>
</tr>
<tr>
<td>2</td>
<td>Harmful Wastes (Special Criminal Provisions etc.) Decree No. 42</td>
<td>1988</td>
<td>Provides the legal framework for the effective control of the disposal of toxic and hazardous waste into any environment within the confines of Nigeria</td>
</tr>
<tr>
<td>3</td>
<td>National Environmental Protection (Effluent Limitation) Regulation</td>
<td>1991</td>
<td>The regulation makes it mandatory for industrial facilities to install anti-pollution equipment, makes provision for effluent treatment and prescribes a maximum limit of effluent parameters allowed.</td>
</tr>
<tr>
<td>4</td>
<td>National Environmental Protection (Pollution and Abatement in Industries in Facilities Producing Waste) Regulations</td>
<td>1991</td>
<td>Imposes restrictions on the release of toxic substances and stipulates requirements for monitoring of pollution. It also makes it mandatory for existing industries and facilities to conduct periodic environmental audits.</td>
</tr>
<tr>
<td>5</td>
<td>National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations.</td>
<td>1991</td>
<td>Regulates the collections, treatment and disposal of solid and hazardous wastes from municipal and industrial sources.</td>
</tr>
<tr>
<td>6</td>
<td>National Guideline and Standard for Environmental Pollution Control</td>
<td>1991</td>
<td>The regulations provide guidelines for management of pollution control measures.</td>
</tr>
<tr>
<td>7</td>
<td>Environmental Impact Assessment Act (Decree No. 86).</td>
<td>1992</td>
<td>The decree makes it mandatory for an EIA to be carried out prior to any industrial project development</td>
</tr>
<tr>
<td>8</td>
<td>Urban and Regional Planning Decree No 88</td>
<td>1992</td>
<td>Planned development of urban areas (to include and manage waste sites)</td>
</tr>
<tr>
<td>9</td>
<td>Environmental Sanitation Edicts, Laws and Enforcement Agencies</td>
<td></td>
<td>General environmental health and sanitation. Enforcing necessary laws</td>
</tr>
</tbody>
</table>
103. Other provisions are:


   b. Guidelines and Standards for Environmental Pollution Control in Nigeria 1991;


   d. National Guidelines and Standards for Water Quality 1999


**Edo State Sanitation and Pollution Management Law – Law No 5 of 2010**

- The law was created to regulate sanitation and control pollution in Edo State, established the Edo State Waste Management Board, and created State and Local Government Technical Committees and matters connected with it. Under its provision for pollution and abuse of land, water and air, the, it provided for environmental impact assessment and related matters in Edo State. It specifically states that in addition to the EIA Act, all development projects in Edo State as from the commencement of this law shall undergo EIA process before commencement under the supervision of the appropriate authority. It further states that the conduct of EIA in Edo by any person/company/consultancy or whatever name shall only be permitted upon the fulfilment of the following: the person/company/consultancy or by whatever name shall before commencement of the EIA studies be registered in Edo State by the appropriate authority; a registration fee, which would be determined from time to time shall be charged by the appropriate authority for requests pertaining to subsection 2 (a); an already registered person/company/consultancy or by whatever name shall be required to pay an annual renewal fee, which shall be determined from time to time by the appropriate authority before embarking on the conduct of EIA studies in Edo State; an appropriate authority on being informed by an appropriate Federal Authority of its approval for an EIA process shall participate fully in the entire process.

104. It further states that upon success conduct of EIA in Edo State, an Environmental Impact Statement shall be issued upon payment of a prescribed fee as shall be determined from time to time by the appropriate authority. Companies, establishments or corporate organizations that contravenes the provisions are required to pay a fine of not less than five million naira (₦5,000,000) and/or closure of such facility. The law also made provision for environmental auditing of all industrial facilities every two years using environmental consultant accredited by both federal and state ministries of environment.

**System Assessment and Evaluation**

105. The national EIA systems are comprehensive but are considered to have the following gaps:

   a. There is no requirement for consulting with local communities or vulnerable people

   b. There is weak coverage of social issues
c. The capacity of the ministry to monitor and enforce ESIA requirements is weak.

d. There are no project grievance mechanisms

e. There is weak capacity in delivering a robust ESIA process at the State level

f. Compliance supervision of EIAs is very weak.

g. Weak monitoring and evaluation of environmental and social systems

h. Challenges in implementation of the existing legal/regulatory provisions due to poor capacity and lack of awareness

106. Furthermore, the EIA provisions of the Edo State Sanitation and Pollution Management Law have gaps, may limit private investment in the state and may also conflict with the federal EIA Act. First, it did not categorize the different types of development projects which EIA will apply. Thus, every development project even if it will have negligible impact on the environment will be required to carry out an EIA. Secondly, the provision further implies that development project proponents will conduct two EIAs, one for the Federal and one for the State. This condition may discourage prospective investors from investing in the state given the cost involvement and implications of avoiding it. In addition, although the provisions will help in ensuring environmental management in the state, it will most likely conflict with the Federal EIA Act and the national EIA systems both in terms of implementation and enforcement. Ultimately private investment will be impacted. Also, there is weak capacity to effectively implement the EIA framework. Generally, the Ministry can leverage on the experience of NEWMAP in dealing with issues relating to project specific environmental and social assessments.

107. Moreover, given the number of PP and investment project that Edo State expects to attract given the reforms and the PforR, the Ministry of Environment does not have a guidance manual on environmental, health and safety to sensitize and educate investors in the different sectors of the requirements for environmental management.

**Core Principle 2: Natural Habitat Protection**

108. Within the EIA process, early identification and screening for important biodiversity areas is achieved through project categorization, the location or otherwise of the project in Environmentally Sensitive Areas is an important criterion in assigning project category. Environmentally sensitive areas include coral reefs, mangrove swamps, small islands, tropical rain forests, areas with erosion prone soils, natural conservation areas, etc. Nigeria’s National Forestry Policy was approved in 2006. The legislation to support this Policy known as the National Forestry Act has not been passed into law. Once passed, the National Forestry Act will be administered by the Federal Department of Forestry which is a parastatal agency of the FMEnv.

109. **National Forestry Policy (2006):** The overall objective of the national forest policy is to achieve sustainable forest management that would ensure sustainable increases in the economic, social and environmental benefits from forests and trees for the present and future
generation including the poor and the vulnerable groups. Specifically, the objectives include the need to:

• increase, maintain and enhance the national forest estate through sound forest management practices; address the underlying causes of deforestation, desertification including lack of policy support, market distortions, weak regulations and rural poverty; promote and regulate private sector involvement in forestry development, and to create a more positive investment climate in the sector; capitalize on the economic, social and environmental opportunities in forestry without undermining the resource base; encourage forest dependent people, farmers and local communities to improve their livelihood through new approaches to forestry; ensure the survival of forest biodiversity and to balance this with the pressing development needs of the country; rehabilitate and conserve key watershed forests; promote and maintain the greening of the urban environment, and meet the increasing demand for forest products by urban centres; ensure that improved tenure to land and tree acts as an incentive for individuals, communities and women in particular to invest in forestry; help private owners and communities to reserve land for forestry; build capacity and systems for state and local government to engage actively in forest resources management and development; apply an effective regulatory system to safeguard public interests under private sector forest management agreements to ensure adequate legal provisions for tenure in order to encourage long-term investment; develop partnerships or management agreement with local communities that improve forest management and alleviate poverty; strengthen and make best use of the capacity and reach of NGOs and CBOs in facilitating forest development; develop and promote responsive, affordable, well-informed and decentralized forestry advisory services to farmers, communities and the forest industry; develop and support demand driven, well-coordinated forestry research and training institutions and programmes; and develop a forest sector programme that translates forest policy into action in a way that complements programmes in related sectors.

110. There are three categories of protected areas in Nigeria established to protect flora and fauna. These categories are the National Parks, Game Reserves and Forest Reserves. At the national level, the mandate for wildlife conservation and protected areas management is the responsibility of the National Parks Service, an agency within the FMENV. There are seven national parks spread across the country. These parks receive the highest level of protection in accordance with the National Parks Service Act of 1999, No 46. A variety of game reserves are managed by the states in which they reside in an effort to preserve wildlife species. States also manage innumerable forest reserves with the intention of preserving trees and other plant species along with associated wildlife. Many forests are highly degraded due to unsustainable extraction of timber, fuelwood, economically important plans, bushmeat and other resources.

111. The Government of Nigeria has introduced a number of forest policy, programmes and instruments in an effort to reverse the deforestation trend: The Nigeria REDD+ is among them. Already, the completed the REDD+ Readiness phase and is currently finalizing the REDD+ strategy that will guide future investments in REDD+.

Edo State Forestry Law

112. At the State level, Edo State Ministry of Environment has a department of forestry which according the ministry, effort is being made, with the support of the UNDP, to elevate to a
forestry commission. Currently, Edo State has a forestry law which governs forestry activity in the State. The Forestry Law was based on the amendments to former Bendel State Forestry Law which is still the principal law. Notwithstanding the provisions of the law against indiscriminate cutting of trees, bush burning and deforestation, aggressive efforts to acquire land for private investment may result in forest conversion.

**Edo State Forestry Policy**

113. Edo State government developed a forest policy in order to encourage and support an aggressive establishment of plantations of economic trees of both exotic and indigenous species and foster the redirection of development resources such that: forest lands are not allocated to other uses unless it in in superior interest of the state; conscientious efforts are made to improve the forest estate through public and private agencies; and with the agreement that the state forest lands constitute a great asset and should be so developed with an infinite socio-economic, environmental and welfare impact. The overall objective of the forest policy is to achieve sustainable forest management that would ensure sustainable increase in the economic, social and environmental benefits from forests and trees for the present and future generations. Specifically, the objective includes the need to:

- increase, maintain and enhance the state forest estate through sound forest management practice; address the underlying causes of deforestation, including lack of policy support, market distortions, weak regulations and rural poverty; promote and regulate private sector involvement in forest development to create a more positive investment climate in the sector; capitalize on the economic, social and environmental opportunities in forestry without undermining the resource base; encourage forest dependent people, farmers and local communities to improve their livelihood through new approaches to forestry; ensure the survival of forest biodiversity; help private and communal forestry practice; develop partnership or management agreements with local communities so as to improve forest management and alleviate poverty; strengthen and make use of the capacity of NGOs and CBOs in facilitating forest development; develop and promote responsive, affordable and decentralized forestry advisory services to farmers, communities and the forest industry; and develop and support well-coordinated forestry and training institutions and programmes.

**Systems Assessment**

114. The identified gaps are:

a. The forestry sector in Nigeria faces a mirage of problems stemming from the fact that forest management is limited and, in some cases, non-existent and therefore, the reserves are degrading.

b. Poor funding of forest management and biodiversity conservation to the point that forest reserves in Nigeria in Nigeria have been so degraded and were referred to IITO (2006)\(^3\) as deforested forest

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reserves.

c. In Edo State, there is limited capacity as there is lack of professionals in the sector to effectively manage the state forestry resources.

d. There is also poor funding to facilitate reforestation of degraded areas.

e. Also, due to poor forest management, private firms and individuals with forest concession to cut and replant trees do not replant based on the terms of the agreement.

Core Principle 3: Public and Worker Safety

115. As per Table 1.1, Core Principle 3 is not applicable as there are no physical works supported by the program.

   Occupational Health and Safety:
   • Factories Act, 1958
   • Public Health Law
   • Worker’s Compensation Act

116. Also, the Edo State Sanitation and Pollution Management Law requires corporate organizations and companies to create a unit called Environment, Health and Safety Unit (EHS) which will be made up of Environmental Quality Managers that will be specifically responsible for the management/maintenance of the environment and which will work directly with regulators in pollution control and management unit of the ministry/appropriate authority.

5.1.2 Social Policy and Regulatory Framework

117. This sub-section describes both the Federal and State Governments’ social management systems in relation to the core principles incorporated into the Bank Policy Program for Results Financing: (i) management of land acquisition; (ii) consideration of the needs of vulnerable groups; and (iii) avoidance of exacerbating social conflict/consideration of conflict risks.

P4R Core Principle 4: Management of Land Acquisition

118. Land Use Act (1978): The legal basis for land acquisition and resettlement in Nigeria is the Land Use Act of 1978 which was modified in 1990. The following are selected relevant sections:

   • Section 1: Subject to the provision of this Act, all land comprised in the territory of each state in the Federation is hereby vested in the Governor of each state and such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provision of this Act.
   • Section 2: (a) All land in urban areas shall be under the control and management of the Governor of each State; and (b) all other land shall be under the control and management of the local government within the area of jurisdiction in which the
land is situated.

119. Therefore, according to the Land Use Act, all land in Nigeria is vested in the Governor of each State and shall be held in trust for the use and common benefit of all people. The administration of land area is divided into urban land which is directly under the control and management of the Governor is each State; and non-urban land, which is under the control and management of the Local Government. The Governor of each State has the right to grant statutory rights of occupancy to any person or any purpose; and the Local Government will have the right to grant customary rights of occupancy to any person or organization for agricultural, residential and other purposes.

Legal Provision for Land Use and Management in Edo State

120. Edo State also has a number of laws related to land use that enables it to administer zoning, land registration, collection of land use charge and private property protection. These include Edo State Land Administration and Geographic Information Service Law 2018, Edo State Land Use Charge Law 2012 and Edo State Private Properties Protection Law 2017.

Edo State Land Administration and Geographic Information Service Law, 2018:

121. This law established the Edo State Geographic Information Service (EDOGIS) to replace Edo State Ministry of Lands and Surveys. The functions of the agency as provided in the law are as follows:

- Establish and maintain a state geographic information system to be known as the Edo Geographic Information System to enhance land use, management and administration in the State; compile and collate information and data about land in the State and provide products and services derived there from and other related information to the government and the general public; establish and regulate the standards to be applied in compilation of data relating to land ad its administration in the State; maintain and manage all copyrights and patents over all such data generated in the course of its duties on behalf of the state government; notwithstanding any provision in any other law, the agency shall have the responsibility for all land administration matters and enforcement in the State including but not limited to: creation of lands registry herein all land titles and instruments in the State shall be registered; prescription and review of rates as may be appropriate from time to time and the maintenance of information on rents payable and paid in accordance with the Land Use Act; repository and management of master plans, district plans, survey information and dataset including charges for services; processing of and grant of certificates of occupancy, rights of occupancy, customary titles and grants of consent to land transactions as required by law; supervision of all land use allocation committee; administration of the town and rural planning systems including not limited to management and repository of datasets, including charges for services, growth management and other services as listed in schedule to this law; provision of such other services as are attendant to the maintenance of geospatial and land information service, land rights and geographic and land records as are provided for in regulations made pursuant to this law.

122. The law also made detailed provision for the registration of land titles in Edo State. In terms of compensation, it spelt out in section 52 that all matters connected with payment of compensation for revocation of right of occupancy shall be governed in accordance with relevant provisions of the Land Use Act.
Business Incentives Relating to Land in Edo State

123. In order to support investors in Edo State, the government provides some support with respect to land acquisition. The government supports with land selection and acquisition through reduced/zero cost (in some cases) of land acquisition especially in agriculture and industry sectors. Other incentives include, land preparation and leasing by the government for farming, shortening time required to obtain a Certificate of Occupancy (Cof O), community relations engagement to ensure peaceful possession of acquired land and moratorium of land use charge.

124. Edo State Private Properties Protection Law 2017: The law prohibits forceful land takeover, prohibition by entry by violence and illegal occupation of property. In terms of forceful takeover of land, the law provides that no person or group of persons shall use force or self-help to take over any property or engage in any act inconsistent with the proprietary rights of the owner of any property in the state. It also provides that any person or group of persons who, having used force to take over a landed property in the State before the commencement of this law remains in possession of the said property three (3) months after the commencement of this Law, commits an offence. In addition, in terms of entry by violence, the law provides that a person who, without lawful authority, uses or threatens violence for the purpose of securing entry into any landed property for himself or for any other person commits an offence. Also, in terms of illegal occupation of property, the law provides that a person who occupies a property as an encroacher and fails to leave the property or deliver up possession on being required to do so by or on behalf of the owner of the property commits an offence.

Assessment and Evaluation of Systems for Land Administration and Management

125. Edo State government through the EDOGIS law and private property protection law has made significant progress in land administration and management in the State. The issue of land administration has been digitized and the process of land registration is clear and straightforward with a commitment to thirty-day processing period of land registration. Also, the private property protection law also offers incentive for investors to invest as they would be rest assured that their property would be secure. However, some issues still remain.

126. For example, the nature of compensation and impact mitigation under Edo State Land Administration and Geographic Information Service Law is limited when viewed from the perspective of international best practice. The law in section 52 indicated that all matters connected with payment of compensation for revocation of right of occupancy shall be governed in accordance with relevant provisions of the Land Use Act. Generally, compensation as provided in Land Use Act is for value of land, buildings, installations or improvement and crops, often using scheduled rates that are out-of-date and non-aligned with market value. The law also does not require that alternatives be explored to minimize the need for displacement. There is no reference to mitigating for loss of income and livelihood impacts. Also, squatters, especially on government land are also not compensated in any form rather they are giving notice to vacate the land.

127. The law did not make provision for consultation or seeking the consent of people who are likely to be affected by large-scale land acquisition and for incorporating their views in any land related matters. However, during discussion with EDOGIS Managing Director, we
learnt that the communities are consulted. In addition, provisions for monitoring and grievance mechanisms are also generally lacking, and there is no provision for the reversion of land to original owners in the event a proposed investment does not materialize. In practice, there is a long history in Nigeria (as in the most countries on the continent) of public distrust of government compulsory acquisition, particularly when used in support of a commercial private actor, and a poor track record in terms of compensation, resettlement and governance.

128. The following features of current land administration and management in Edo State have the potential, if not addressed, of exacerbating land related risks associated with land-intensive commercial investment:

   i. Compulsory acquisition processes and compensation standards are not consistent with international best practice.

   ii. Reliance on compulsory acquisition may limit the potential involvement of local communities as genuine partners in an investment.

   iii. The capacity in Edo State Government to conduct land acquisition and reallocation efficiently and fairly is limited. Despite the significant advances made with the creation of EDOGIS, capacity within state and local government institutions responsible for land administration and management remains weak. There is limited experience with implementing the land acquisition procedures under the Land Use Act in rural areas.

**P4R Core Principle 5: Consideration of the Needs of Vulnerable Groups**

129. There are no groups in Nigeria that meet the World Bank's criteria for Indigenous Peoples. Thus, this section has adapted Core Principle 4 to look at the systems that address the needs of vulnerable people, including ethnic minorities.

130. Marginalized groups include girls and youths. There are some vulnerable groups that warrant careful consideration in the context of implementing EDOBEST and digital skills and entrepreneurship training (DLI1, DLI2, and DLI7). These include women (especially the girl child), orphans and people with disabilities, and certain ethnic groups.

131. Chapter IV of the Nigerian Constitution contains a variety of fundamental rights set out in Sections 33 - 44. Of particular relevance is Section 42, which prohibits discrimination on the grounds of ethnic origin, sex (gender), religion, or linguistic affiliation.

**Vulnerable Groups**

**Gender**

132. Gender equality in Nigeria suffered a setback when the National Assembly, in Nigeria rejected, in early 2017, a gender and equality opportunities bill. The bill looked to protect Nigerian women from the violence and provide them with the same marital rights as their male counterparts including the rights of widows to inherit their husband's property. The bill was introduced by Senator Abiodun Olujimi but did not pass a second reading as opponents rejected it as an attack on religious beliefs and the Nigerian constitution. Overly incorporating parts of the UN Convention on the Elimination of All Forms of Discrimination against Women, the bill declared that women "shall not be subjected to inhuman, humiliating or degrading treatment" and "shall have the right to an equitable share in the inheritance of the property of her husband." Despite the failure of this legislation, there are still laws and policies at both the Federal and State level that aim to protect and enhance the interests of
women and girls.

133. Nigeria has committed herself in principle to promoting gender equity and social inclusion. Several policy statements and programmes at the state and federal levels clearly indicate the nation’s commitments to achieving the United Nations Millennium Development Goals (MDGs). The nation established the Ministry of Women Affairs at both federal and state levels in 1999. It also signed various treaties that promote gender equality and empowerment including the United Nation (UN) Conventions on the Elimination of all forms of Discrimination against Women (CEDAW) in 2000 and the African Union (AU) Protocol on Women Rights. The Nigerian National Assembly has passed specific bills directed at protecting women such as Senate Bill 66 (2008) which provided for the abolition of all forms of discrimination against women in Nigeria and Senate Bill 300 (2009) which amended the Labor Act to remove discrimination against women relating to night shifts and underground work (Federal Government of Nigeria 2009). The House of Representatives also passed bills that sought to protect women by prohibiting corporate prostitutions (2009), providing support for battered women (2003) and prohibiting female circumcision (2000).

134. Edo State is gender sensitive in its activities and has domesticated a lot of gender-based legislations and conventions which Nigeria signed into, for example, the Violence Against Person Prohibition Act of 2015 was domesticated in the State in February 2019 with the promulgation of Violence Against Persons Prohibition Law of Edo State 2019. Other laws relating to women in Edo State include, Edo State Trafficking in Persons Prohibition Law 2018, Child’s Rights Law 2007, Law prohibiting Female Genital Mutilation in Edo State and Law against Widowhood Practices in Edo State. To facilitate gender inclusiveness, the government of Edo State recently changed the Ministry of Women Affairs and Social Development to Ministry of Social Development and Gender Issues.

135. The Women and Gender Affairs Department of the Ministry is one of the key operational Departments charged with the responsibility of promoting women’s advancement at both State and National levels. The Ministry of Social Development and Gender also has a mandate to look after the interest of people with disabilities and help formulate policies to improve their lives.

136. The Department undertakes the coordination of all activities that relate to the advancement, active participation of Edo women in the development of the state and overall gender mainstreaming in all aspects of public life. It promotes policy formulation and programme implementation aimed at integrating women into all sectors of development in order to achieve government’s targets and intentions.

137. To achieve the set goals, the Department works in close collaboration with Gender Desk Officers in line Ministries and Agencies, Women Non-Governmental Organizations and Cooperative Groups, United Nations, Civil Society Groups, Legislatures and International Development Agencies.

138. In addition, Edo State has a task force against human trafficking (ETAHT) which aims to eradicate the problem of trafficking of Edo males and females to other countries. The task force also aims to eradicate modern day slavery of Edo persons; and to be a focal point of assistance for returnees to Edo State, aiding their reintegration. The task has been very active in receiving returnees, resettling them, empowering them with vocational training and skills, paying them some stipend among others. The task force has also been very active in advocacy
and sensitization in different communities especially in the endemic areas. ETAHT has also been involved in investigation and prosecution of perpetrators. Since the past one year, ETAHT has received into its rehabilitation scheme a total number of 4971 returnees from 60 batches since the last quarter of 2017 till date. The taskforce has also received ten (10) female returnees from Russia.

Assessment and Evaluation of The Inclusion and Protection of Vulnerable Groups
Management Systems

139. The current Federal and State laws and policies on vulnerable people are characterized by a general objective to ensure non-discrimination in all walks of Nigerian life. It is clear that there is commitment at the macro level of Federal and State governments to improve the social inclusion of historically excluded groups. However, the policies, regulations and approaches are too general to be effectively put into operation or enforced.

140. The following initiatives are recommended to strengthen the government’s systems:

- Strengthen and systematize stakeholder engagement activities that are inclusive.
- Work with different representative groups that include women, men and youth (with disabilities) to participate in identifying solutions methods for participating in conflict resolution initiatives.
- Data could be disaggregated by gender, age, disability
- Ensure that there are specific mechanisms to support the access to services and economic opportunities for people with disabilities

141. Furthermore, Edo State has no gender policy thus; there is need to develop a policy to facilitate gender mainstreaming and creation of a framework for gender responsiveness, sensitivity and equality principles in public and private spheres in Edo State. In addition, the existing agencies responsible for gender issues do not possess adequate technical expertise to address some of the social and economic hindrances that inhibit women and girls’ economic and social development equal to that of men and boys in Edo State. Practical approaches informed by information and partnerships with women’s groups would help to give these agencies the tools to deliver activities that are aligned with Federal and State objectives. Specific measures that should be explored to strengthen these systems would be:

- Ensuring that stakeholder engagement addresses the issue and concerns of women, youth and older people; people with disabilities
- Monitoring progress in sectors such as employment, land ownership and conflict resolution whilst still maintain information on health and education indicators – where the majority of gender disaggregated exists; and,
- Developing a program of information gathering and analysis that is disaggregated by sex and age, and disability
- Build the capacity of some stakeholders to deliver their mandate regarding gender and disability justice and equality, for example, there is a need to build the capacity of Legislature, Judiciary and law enforcement agencies to uphold gender justice and gender equity principles.

Labor Protection
142. Labor law is well developed in Nigeria; with laws defining the rights and obligations of labor and regulating most aspects of the relationship between the employer and labor including contracts, wages and hours, discrimination, terminations, lay-offs, safety, pregnant workers, reasonable accommodations and others. National Labour and Employment law is largely based on the following statutes:

- the Labour Act of 2004;
- the Trade Union Amended Act, 2005;
- the Employees Compensation Act, 2010;
- the Factories Act, 2004;
- the Pensions Act, 2004; and

143. The Federal Ministry of Labour and Productivity is the main regulatory agency. There are also well organized labour unions within Nigeria and Edo State. The National Industrial Court has exclusive jurisdiction in civil cases connected to labour, employment, trade unions and matters related to the workplace including health and safety. With regard to discrimination, there are no laws that specifically prohibit discrimination or harassment in the employment context. However, Section 42 of the Nigerian Constitution provides for freedom from discrimination on the basis of sex, age, ethnic group, disability and political affiliation.

144. The capacity to enforce labour laws is weak given the availability of resources. In 2015, the Labour Inspectorate employed 660 labour inspectors compared to ILO’s recommendation of 3800 in order to adequately enforce labour laws throughout the country (one inspector for every 15,000 workers in industrializing economies) 4

Child Rights

145. The Federal Child’s Right Act (CRA) (2003) codifies the rights of children in Nigeria. The Act was designed to incorporate into its laws all the rights guaranteed in the United Nations’ Convention on the Rights of the Child. The U.N. convention, adopted in 1989, states that: “The child shall be protected against all forms of neglect, cruelty and exploitation. He shall not be admitted to employment before an appropriate minimum age; he shall in no case be caused or permitted to engage in any occupation or employment which would prejudice his health or education, or interfere with his physical, mental or moral development.” The Act must be ratified by each state to become law in its territory. Edo State ratified the Act and enacted Edo State Child Rights Law 2007. The State, through the Ministry of Women Affairs published a simplified edition of the law in 2014.


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State Ministry of Social Development and Gender Issues has a Child Development Department that coordinates all the activities of the State and Ministry regarding Children.

147. The Labour Act (2004), which is in force in all 36 states, has some prohibitions of hazardous occupations for children. The Act sets out the minimum age for work as 12, and the minimum age for hazardous work as 18. However, there are inconsistencies in the laws making it unclear what minimum ages apply for certain types of work.


149. The Ministry of Labour and Productivity issued a National Policy on Child labour in 2013 that provides guidelines for various stakeholders to implement a national program on child labour.

**Assessment and Evaluation of Labor Systems**

150. Enactment and enforcement of labour laws is primarily at the Federal level. Good international practice for the private sector recommends that companies have certain environmental and social policies in place, including a policy on labour and working conditions, to reinforce and put legal requirements into operation. Private investors should also have age verification systems and should monitor their supply chains.
SECTION VI: SYSTEMS ASSESSMENT AND IDENTIFICATION OF GAPS

6.1 System Assessment based on Core Principles

151. This section provides an assessment of the extent to which the applicable systems are Consistent with the core principles and key planning elements expressed in the P4R Guidance Document. It also provides a review of aspects where gaps exist between the two.

<table>
<thead>
<tr>
<th>Bank Directive for Program-for-Results Financing: Program procedures will:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level.</td>
</tr>
<tr>
<td>• Incorporate recognized elements of environmental and social assessment good practice, including:</td>
</tr>
<tr>
<td>• early screening of potential effects;</td>
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<tr>
<td>• consideration of strategic, technical, and site alternatives (including the “no action” alternative);</td>
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<tr>
<td>• explicit assessment of potential induced, cumulative, and trans-boundary impacts;</td>
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<tr>
<td>• identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized;</td>
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<tr>
<td>• clear articulation of institutional responsibilities and resources to support implementation of plans; and</td>
</tr>
<tr>
<td>• Responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Core Principle 1: General Principle of Environmental and Social Management</th>
<th>Summary of Assessment of Environmental and Social Management Systems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bank Policy for Program-for-Results Financing: 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.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Applicability</th>
<th>Systems Assessment</th>
<th>Gaps</th>
<th>Suggestions to Fill Gaps</th>
</tr>
</thead>
<tbody>
<tr>
<td>DLI 1: Primary schools implementing EdoBEST for improved quality and accountability</td>
<td>ESIA regulatory framework aligns well with the Core Principle.</td>
<td>• There is no requirement within ESIA processes for consulting with local communities or vulnerable people</td>
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<tr>
<td></td>
<td></td>
<td>• There are no project grievance mechanisms</td>
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<td></td>
<td></td>
<td>• There is weak coverage of social issues in EIA legislation</td>
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<td></td>
<td></td>
<td>• The capacity of the federal ministry of environment to monitor and enforce ESIA requirements is weak</td>
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<tr>
<td></td>
<td></td>
<td>• There is weak capacity in delivering a robust ESIA process at the State level</td>
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<tr>
<td></td>
<td></td>
<td>• There could be conflict in Edo State and Federal EIA process</td>
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<tr>
<td></td>
<td></td>
<td>• Compliance supervision of EIAs is very weak.</td>
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<tr>
<td></td>
<td></td>
<td>• Weak monitoring and evaluation of environmental and social systems</td>
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<td></td>
<td></td>
<td>• Challenges in implementation of the existing legal/regulatory provisions due to poor</td>
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<td></td>
<td>• A robust public consultation strategy is required to improve citizen engagement in</td>
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<td></td>
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<td>• ESIA processes to incorporate socio-economic assessments</td>
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<td></td>
<td></td>
<td>• Reinforce capacity of Edo MOE&amp;S on the ESIA process.</td>
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<tr>
<td></td>
<td></td>
<td>• Strengthening the environmental and social management system</td>
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<tr>
<td></td>
<td></td>
<td>• Assignment of project staff to environmental and social management (Edo Ministry of Environment and Sustainability)</td>
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<tr>
<td></td>
<td></td>
<td>• Strengthening the implementation of environmental and social monitoring/auditing systems:</td>
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<tr>
<td></td>
<td></td>
<td>• Establish a tracking system to monitor environmental and social risks, performance, consultations, etc.</td>
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<tr>
<td></td>
<td></td>
<td>• The Ministry of Environment to reinforce its mandate of monitoring activities.</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>• Technical staff responsible for environmental and social management must monitor and supervise E&amp;S compliance at least once per quarter Environmental and social management audits every two years (Edo MOE)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Work with the FMEnv to organize and implement EIA procedures;</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• Strengthening of environmental management capacity: Training in environmental and social management/sessions for budgeting for environmental and social mitigation measures for technical staff (Edo State MOE &amp;S/FMEnv);</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Enhance the capacity of Ministry of Environment and Sustainability for an accredited laboratory.</td>
<td></td>
</tr>
</tbody>
</table>
implementation and lack of awareness

| DLI 7: Establishment of Board of Governors to provide strategic, policy guidance including establishment of PPP model to encourage and support private sector participation in training delivery at innovation hubs | Strength of ESIA systems are noted above under DLI 1 and 2 | Gaps with respect to ESIA systems are noted above under DLI 1 and 2 | In addition to some suggestions above, ensure that PPP framework (i.e. PPP model) to include E&S best practices
Prioritization of PPP will include E&S criteria. Program activities with significant environmental and social impacts (equivalent to Category A) will be excluded from the Program. |

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### Core Principle 2: Natural Habitats and Physical Cultural Resources

**Bank Policy for Program-for-Results Financing:** 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.

**Bank Directive for Program-for-Results Financing:** 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.

**Applicability:** Not applicable

It is not expected that the PforR areas will have adverse impact on natural habitats and physical cultural resources since it does not involve new or upgrading of infrastructure. Thus, core principle two is not applicable.
Core Principle 3: Public and Worker Safety

<table>
<thead>
<tr>
<th>Bank Directive for Program-for-Results Financing: 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.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Applicability</strong></td>
</tr>
<tr>
<td>DLI 6: Establishment of Governance Structure to provide strategic, policy guidance including establishment of PPP model to encourage and support private sector participation in training delivery at innovation hubs</td>
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<tr>
<td></td>
</tr>
</tbody>
</table>

Core Principle 4: Land Acquisition

<table>
<thead>
<tr>
<th>Bank Directive for Program-for-Results Financing: As relevant, the program to be supported:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Avoids or minimizes land acquisition and related adverse impacts;</strong></td>
</tr>
<tr>
<td><strong>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;</strong></td>
</tr>
<tr>
<td><strong>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;</strong></td>
</tr>
<tr>
<td><strong>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</strong></td>
</tr>
<tr>
<td><strong>Restores or replaces public infrastructure and community services that may be adversely affected.</strong></td>
</tr>
</tbody>
</table>

**Applicability:** Not applicable

It is not expected that the PforR areas will not involve land acquisition. Thus, core principle 4 is not applicable.
Core Principle 5: Indigenous Peoples and Vulnerable Groups

**Bank Policy for Program-for-Results Financing:** 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.

**Bank Directive for Program-for-Results Financing:**
- 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 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, people with disabilities, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits.

There are no Indigenous Peoples in Nigeria, so this assessment focuses on other vulnerable groups.

<table>
<thead>
<tr>
<th>Applicability</th>
<th>Systems Assessment</th>
<th>Gaps</th>
<th>Suggestions to Fill Gaps</th>
</tr>
</thead>
<tbody>
<tr>
<td>DLI1: Primary schools implementing EdoBEST for improved quality and accountability.</td>
<td>The legal and institutional framework for Edo State Universal Basic Education is in place.</td>
<td>There is no clear provision for orphaned and vulnerable children to ensure they are not discriminated against Children that are already out-of-school are not covered by the program.</td>
<td>Make provision for disabled, orphaned and vulnerable children through the activities of the School Based Management Committee (SBMC) to be supported under the TA component. Develop a strategy to incorporate out-of-school children in the program. Incorporate issues of sexual abuse and gender-based violence in capacity building programs for teachers.</td>
</tr>
<tr>
<td>DLI 2: JSS implementing EdoBEST for improved quality and accountability:</td>
<td></td>
<td></td>
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<tr>
<td>DLI 7: Delivery of Digital Skills and digital entrepreneurship training</td>
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</tbody>
</table>

Core Principle 6: Social Conflict

**Bank Policy for Program-for-Results Financing:** Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

**Bank Directive for Program-for-Results Financing:** Considers conflict risks, including distributional equity and cultural sensitivities.

**Applicability:** Not applicable
6.2 Grievance Redress Mechanism

152. Effective grievance handling mechanisms play an important role in the process of addressing complaints and disputes arising from implementation of the program. For the GRM to serve this purpose, it must be developed and applied to meet the needs of beneficiaries, being cost-effective, accessible, and working on the basis of a well-defined time schedule.

153. The social assessment conducted during preparation indicated that, as part of risk mitigation measures, EDOBEST would require to develop and operate an independent GRM in the implementation of program. Therefore, the complaints and grievances of affected people and beneficiaries in the course of the program implementation would be handled in a formal, transparent, cost-effective, and time-bound manner. The project specific GRM would be established and operationalize prior to the commencement of activity implementation as a core part of EDOBEST structure to deal specifically with complaints related to the program. This GRM might be aligned to existing formal or informal system supported with project specific arrangement. EdoBEST will take ownership and monitoring of the implementation of the GRM. Applicable quarterly implementation report would be documented to the bank by EDOBEST. The GRM will:

- Illustrate the various levels available for making complain, provide transparence procedure for handling complaint and structure.
- Provide specific places and where grievances can be received and means of submitting grievances
- Advertise the grievance process in the course of it’s overall stakeholder’s engagement activities.
- Indicate the length of time for acknowledgement, response and resolution depending on the urgency of the complaint.
- Maintain a logbook where grievances are registered in writing and maintain as a data base and
- Provide an appeal process for complainants who feel dissatisfied with resolution reached on their complaints
SECTION VII: CONCLUSION AND RECOMMENDATION

154. Edo State as a reforming state has initiated key reform efforts to improve the investment climate and public private partnership in the State and to support the development of the private sector, as the driver of job creation. For example, the state created the investment promotion agency and the public private partnership office and has embarked on a landmark program of reforming its basic education through the Edo BEST program and to facilitate Technical Vocational Education, innovation and creativity and job creation through Edo State Skills Development Agency. It also has undertaken a number of initiatives to strengthen its fiscal sustainability. The Edo Government is committed to the PforR program of work outlined in this ESSA and has demonstrated its political will to tackle the challenges that hinder its social and economic development as reflected in the Edo State Development Plan.

155. This section recommends measures that will be taken to strengthen system performance in line with the gaps and risks identified in the system assessment section to ensure that the Program interventions are aligned with the Core Principles of Bank Policy for Program-for-Results financing. The identified key areas are elucidated below. These actions may be further refined and adjusted during the consultation process and the implementation of the Program.

7.1 Environmental Summary and Recommendations

156. Although Edo State, following Nigeria environmental management system has an environmental system that is in line with the core principle on environmental assessment, some gap still remains. The EIA system in Edo State as provided by Edo Sanitation and Pollution Management Law does not fully align with the Federal EIA Act and the national EIA systems both in terms of implementation and enforcement. As learnt during consultation with the Edo State Ministry of Environment, this sometimes results in conflict especially when organizations receive EIA approvals from Federal Ministry of Environment without reference to the State Ministry. Although the State Ministry resolves such issues with the Federal Ministry, this may pose a challenge in the future. Given the expected influx of investments and PPP into Edo State, the Ministry of Environment is advised to proactively engage with investors to ensure they incorporate sound environmental practices in their operations and the ministry does not provide environmental, health and safety guidelines for the different industry clusters in the state.

157. **Recommendation:** The process for enacting new laws or amending existing laws in Nigeria/Edo State can be tricky, difficult, endless and are clearly beyond what a project can do and outside the span of control of the World Bank. To mitigate this risk, the ToR of site specific EIAs will be reviewed to ensure that there is consistent with Nigeria’s EIA act and good international industry practice, including ensure adequate coverage of Social issues.

158. There is also a need to engage suitably qualified environmental and social risk management specialists in the PIU.

159. **Recommendation:** Formulate guidelines and manuals for mainstreaming stakeholder engagement process, and environmental, health and safety issues into the implementation of the Program.

160. **Recommendation:** Conduct annual review and monitoring of progress on environmental and social issues, especially regarding the compliance of the Program activities with the
environmental standards and regulations

7.2 Social Summary and Recommendations

161. The Government recognizes that there are critical issues that need to be tackled in order to achieve its objective as outlined in the Edo Development Program especially that of enhancing inclusive basic education and accessible digital skills.

162. Recommendation: The ESSA recommends that the implementing agency should develop plans and make special provision for orphaned and vulnerable children in Edo State in the implementation of EdoBEST initiatives. The current Edo SUBEP policy should be revised to incorporate this to ensure that this category of citizens is not left out. The ESSA also recommends that EDOBEST provide safe and adequate sanitation facilities that are gender sensitive and accessible to people with disabilities at the training centers including:

- Provide perimeter fencing to ensure safety after careful consideration of the ownership of the land in the vicinity of the school / training centers. Where the land does not belong to the school, applicable acquisition process in line with P4R core principle will be applied.
- Provide more female teachers to provide additional counselling to girls on health and personal development:
- Provide additional training that improves teacher/administrators knowledge of creating an inclusive school environment.
- Increased advocacy program to sensitize on importance of girls and boy’s education
- Provide universal access in all training centers to ensure inclusion and sensitization program for parents with children with disabilities on inclusive education
- Develop curriculum adapted for students with disabilities.
- Monitoring report will document the information on numbers of students disaggregated according to gender and disability to ensure inclusion as part of broader program annual environmental and social risk management implementation.

163. Recommendation: Currently there is no strategy on ground to incorporate the large number of out-of-school children, many of which have disabilities, in the EdoBEST program. Although the SUBEB during stakeholder interaction indicated that they have plans to create learning centres in communities to involve out-of-school children, this plan is not robust as there is no strategy guiding it and there is no clear action plan. Thus, there is a need to develop a strategy to incorporate out-of-school children in the program.

164. Recommendation: Incorporate issues of sexual abuse and gender-based violence in training programs for teachers and in the Delivery of Digital Skills and digital entrepreneurship training. This can be done by sensitizing the teachers and trainees on what constitutes sexual abuse and gender-based violence, displaying of posters and notices in the surroundings on the training centres and in schools including:

- Development of institution code of conduct for teachers and administrative measure mechanism that prohibits GBV and SEA among students and teachers.
- Teachers and staff should be trained on how to respond to students/pupils experience GBV/SEA.
- Identify school-based counselling and referral services by appointing a focal person for GBV/SEA cases.
- Develop and implement guidelines on bullying which spells out consequence.

165. The ESSA recommends the development of institutional Codes of Conduct for teachers and administrative staff that define and prohibit gender-based violence, sexual exploitation and abuse and sexual harassment, and will include administrative measures for accountability and response. It also recommends training for teachers and administrative staff on responding to GBV/SEA, as well as identification of school-based counselling and referral services.

166. **Recommendation:** Furthermore, giving the number of MDA that will be involved in the execution of the program, the ESSA recommends the creation of an office for interagency coordination (Interagency Coordination Office) in Edo State.

167. The ESSA Analysis presented identifies strengths, gaps and opportunities in Edo State’s environmental and social management system for effectively addressing the environmental and social risks associated with the Program and aligning with the Core Principles of Bank Policy for Program-for-Results Financing. These gaps and opportunities have been translated into a viable strategy to strengthen and monitor environmental and social management capacity and performance of Edo State and incorporated into the Program’s overall Action Plan. The Program’s Action Plan, presented below, covers environmental and social actions linked to the ESSA, and will be part of the credit agreement. These Actions are subject to further refinement during the negotiation process or during implementation, as required.
SECTION VIII: PROGRAM ACTION PLAN

168. The Table below indicates the breakdown of actions to be included in the Program Action Plan with indicative timeline, responsibility for implementation and indicators for measuring the completion of such actions.

<table>
<thead>
<tr>
<th>S/NO</th>
<th>Action Description</th>
<th>Due Date</th>
<th>Responsible Party</th>
<th>Completion Measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Formulate guidelines for Implementing agency on mainstreaming stakeholder engagement process, and environmental, health and safety issues into waste management. Specifically, the implementing agency will maintain collection bins or electronics take-back booths in specific locations in the institution and transport the collected e-waste to government approved disposal facilities for handling hazardous waste. In addition, there will be a manifest for tracking of the e-wastes to ensure that e-wastes collected arrive at the final disposal sites/facility.</td>
<td>Before start of program implementation</td>
<td>Edo MOE, Edo IPA, SUBEB, implementing agency</td>
<td>Completed guidelines in booklet form disseminated to stakeholders, training provided, and the guidelines operationalized. The manual which will be simplified will be used by waste managers/handlers.</td>
</tr>
<tr>
<td>2</td>
<td>Conduct annual review and monitoring of progress on environmental and social risks, especially regarding the compliance of the Program activities with the environmental standards and regulations</td>
<td>Within 12 months of end of each FY</td>
<td>Edo MOE, Edo IPA, SUBEB, implementing agency</td>
<td>Completed report with recommendations about E&amp;S issues, including the progress of the implementation of actions indicated in this table. Follow-up measures to the recommendations taken in the following FY.</td>
</tr>
</tbody>
</table>
### Table 8.2: Program Action Plan for Social Management

<table>
<thead>
<tr>
<th>Action Description</th>
<th>Due Date</th>
<th>Responsible Party</th>
<th>Completion Measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Engagement of Environmental and social specialist</td>
<td>Before Program</td>
<td>Implementing Agency</td>
<td>Inclusion of Environmental and social Specialist in the team</td>
</tr>
</tbody>
</table>
| **1** Develop plans to incorporate provisions for orphaned and vulnerable children including strategy to accommodate out of school children in the program | Continue during program implementation | Edo Ministry of Education-Edo SUBEB / Implementing Agency  | ▪ Documented Implementation report to include: Provision of safe and adequate sanitation facilities that are gender sensitive and accessible to people with disabilities at the training center including:  
  ▪ Provide perimeter fencing to ensure safety  
  ▪ encourage more female teachers to provide additional counselling to girls on health and personal development:  
    ▪ Increased advocacy program to sensitize on importance of girls and boys education and children with disabilities  
    ▪ Provide universal access in all training centers to ensure inclusion and increase sensitization programs for parents with children with disabilities on inclusive education  
    ▪ Develop curriculum adapted for students living with disability.  
  ▪ Document the information on numbers of students according to gender and disability to ensure inclusion as part of overall program annual E&S risk management implementation  |
| **2** Develop a plan to deal with issues of sexual abuse and gender based violence in capacity building programs for teachers and in the Delivery of Digital Skills and digital entrepreneurship training | Prior to program implementation and Continue throughout program implementation | Edo Ministry of Education-Edo SUBEB / Implementing Agency  | Document detailing the policy of dealing with sexual abuse and gender violence in Edo BEST and digital skill training in place.  
  ▪ Development of institution code of conduct for teachers and administrative measure mechanism that prohibits GBV and SEA among students and teachers that define prohibition of SEA/SH including administrative measures for accountability and response.  
  ▪ Teachers and staff should be trained on how to respond to students/pupils experience GBV/SEA, especially students who belong to other marginalized groups such as children with disabilities  
  ▪ Identify school-based counselling and referral services by appointing a focal person for GBV/SEA cases.  
  ▪ Including guidelines on bullying |
SECTION IX: FINDINGS FROM STAKEHOLDER CONSULTATIONS

169. The ESSA process includes extensive stakeholder consultations and disclosure of the ESSA Report, in accordance with the World Bank Policy and Directive for Program-for-Results financing and Access to Information Policy. At present, the ESSA consultation process is embedded in the Program consultation process. Feedback from stakeholders is instrumental in designing and revising the Program Action Plan, and indicators.

9.1 Consultation Event for Preparing ESSA (September 16-18, 2019 and April 30, 2020)

170. As part of preparing the ESSA, there was consultation with the government representatives and the private sector with the aim to understand the different government systems so as to be able to assess them in comparison with the P for R principles and thus recommend strategies and actions needed to update the systems in order to ensure that the objective of the P for R program is achieved. The consultation at this stage of the ESSA preparation was limited to the existing relevant government agencies and identified private sector participants. The summary of the consultation held is provided in Table 9.1 below. Additional consultations were held during the virtual appraisal mission, but participation was limited to an extended set of government MDAs and representative of the SBMCs, due to the COVID-19 pandemic restrictions on travel and crowd gathering. The summary of the consultation is provided in the Appendices.
Table 9.1: Summary of Issues raised during the consultation and responses for stakeholders

<table>
<thead>
<tr>
<th>Area</th>
<th>Issues Raised</th>
<th>Findings/Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environment</td>
<td>EIA and how the State Ministry of Environment and Sustainability handle it</td>
<td>In addition to the EIA done at the federal level, the state government also insists that another EIA be done at the State level. The ministry indicated that conflicts arise between the state and federal agents as a result of the state position but not in all cases. The State Ministry of Environment noted that until recently there used to be conflict between federal and State officials sometimes even resulting in the closure of such business operation by the State. But in recent time, there has been tremendous improvement as Federal officials now carry the State along in the EIA process (though this is an informal working relationship).</td>
</tr>
<tr>
<td>Capacity of the Ministry of Environment</td>
<td>The Ministry of Environment and Sustainability to enforce environmental legislation and systems</td>
<td>The Ministry of Environment officials indicated that they have enough capacity in terms of manpower. They indicated that the capacity challenge in the ministry is not in terms of manpower but rather in terms of equipping the available manpower to function optimally.</td>
</tr>
<tr>
<td>Social</td>
<td>Compensation and resettlement during land acquisition</td>
<td>In land acquisition, public interest over-rides private interest regarding land in all circumstances. In acquiring land for a project, compensation is paid only to those that have legal right to the land in question. Those that encroach on the government right of way are asked to evacuate the right of way and they are not compensated. The State only pays compensation for encroaching on people’s property. Compensation is not paid to people with movable assets who are not land owners. In fact, the State considers only people who are genuinely displaced (legal owners of land) and not squatters. A clear picture of the process of land acquisition and due diligence before investments is carried out are detailed below: Selection of site (PPP office). Identify site and survey is done. If suitable, EDOGIS advises government to revoke the land (if applicable) that is suitable using the legal process. Once the interests are identified, evaluation follows. The PPP office has Grievance Committee with government and community having their consultants. Acquisition is not complete until compensation is paid. No grievances redress mechanism in place and no resettlement policy in place.</td>
</tr>
<tr>
<td>Inter-agency coordination</td>
<td>No ministry or agency responsible for inter-agency coordination. Nevertheless, the State government has an Economic &amp; Strategic Team (EST) which considers projects of all the ministries together in a bid to actualize government cardinal objectives.</td>
<td>No ministry or agency responsible for inter-agency coordination. Nevertheless, the State government has an Economic &amp; Strategic Team (EST) which considers projects of all the ministries together in a bid to actualize government cardinal objectives.</td>
</tr>
<tr>
<td>Gender Issues</td>
<td>No existing Edo State gender policy. Need to develop policy for gender mainstreaming Need for advocacy and sensitization of gender based violence. Women suffer violence because they are more vulnerable thus, the program should be designed in such a way that they are well accommodated. Given the dearth of technical staff, there is need for capacity building of ministry staff especially regarding alternative dispute resolution.</td>
<td>There is no gender disparity in acquisition of land; it is based on effective demand (whoever has the money buys without hinderance) but women are often economically disadvantaged. However, in terms of inheritance, the girl child is disinherit in some part of Edo State (e.g. Esan culture). Very few cultures/traditions in Edo State give inheritance to the girl-child. The Benin people tend to be more liberal in this aspect.</td>
</tr>
<tr>
<td>Basic education and EDOBEST</td>
<td>The SUBEB officials noted that one challenge of EDOBEST is continuity pointing out that the target is basic education from primary one to primary six and to JSS 1-3. What will happen when they leave Basic education which covers up to JSS3?</td>
<td>The program does not cover already out-of-school children, but the State government has approved the establishment of learning Centre at the ward level (in every ward) to take care of this category of people.</td>
</tr>
<tr>
<td>Perception of private sector on investment</td>
<td>Multiple taxation is one of the major issues. Although Government is making effort in terms of ease of doing business, but the impact is not readily felt for now. Energy is another major problem especially as energy consists about 70% of business running costs. There is also the issue of bad roads.</td>
<td>Experience in terms of ease of doing business - Registration/renewal of business is very cumbersome and very expensive. Renewal of business permit is supposed to be N10,000 (Ten Thousand naira) but it is higher here. Again, in Lagos State, there is a list of approved taxes and all payments, but it is not the case in Edo State. This gives room for exploitation. Land use charge is another area. A person bought piece of land and didn’t use it for some time only to be given a charge of N400,000 to pay. Although government used its discretion to wave 70% after our intervention but experience made the individual to sell off the land instead of investing in it. Regarding ease of doing business, they rated Edo State 4 on a scale of 1-10. This was because the condition is not satisfactory but there is the willingness on the part of the government to implement some initiatives that will improve the business environment.</td>
</tr>
</tbody>
</table>
9.2 Disclosure

170. The final ESSA report will be publicly disclosed on the World Bank external and in-country at relevant government Ministries, Departments and Agencies (MDAs) at Federal and Edo State levels.
APPENDIX 1: Disbursement Linked Indicators, Disbursement Arrangements and Verification Protocols

### Disbursement Linked Indicators Matrix

<table>
<thead>
<tr>
<th><strong>DLI 1</strong></th>
<th><strong>DLI #1:</strong> Primary schools implementing EdoBEST in line with defined minimum criteria for improved quality and accountability</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Type of DLI</strong></td>
<td><strong>Scalability</strong></td>
</tr>
<tr>
<td><strong>Yes</strong></td>
<td>Percentage</td>
</tr>
<tr>
<td><strong>Period</strong></td>
<td><strong>Value</strong></td>
</tr>
<tr>
<td><strong>Baseline</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Prior results</strong></td>
<td><strong>n.a</strong></td>
</tr>
<tr>
<td><strong>Year 0</strong></td>
<td><strong>DLR# 1.1:</strong> At least 55% of all primary schools in Edo State implemented EdoBEST in the previous school year per minimum criteria set out in the Verification Protocol.</td>
</tr>
<tr>
<td><strong>Year 1</strong></td>
<td><strong>DLR# 1.2:</strong> At least 65% of all primary schools in Edo State are implementing EdoBEST per minimum criteria set out in the Verification Protocol, by the end of Program Year 1.</td>
</tr>
<tr>
<td><strong>Year 2</strong></td>
<td><strong>DLR # 1.3:</strong> At least 80% of all primary schools in Edo State are implementing EdoBEST per minimum criteria set out in the Verification Protocol, by the end of Program Year 2.</td>
</tr>
<tr>
<td><strong>Year 3</strong></td>
<td><strong>DLR #1.5:</strong> At least 90% of all primary schools in Edo State are implementing EdoBEST, per minimum criteria set out in the Verification Protocol by the end of Program Year 3.</td>
</tr>
<tr>
<td><strong>Year 4</strong></td>
<td><strong>DLR #1.6:</strong> At least 95% of all primary schools in Edo State are implementing EdoBEST, per minimum criteria set out in the Verification Protocol by the end of Program Year 4</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>DLI 2</strong></th>
<th><strong>DLI #2:</strong> JSS implementing EdoBEST in line with defined minimum criteria for improved quality and accountability</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Type of DLI</strong></td>
<td><strong>Scalability</strong></td>
</tr>
<tr>
<td><strong>Yes</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Period</strong></td>
<td><strong>Value</strong></td>
</tr>
<tr>
<td><strong>Baseline</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Year 0 (prior results)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>DLR# 2.1:</strong> A firm with at least the minimum qualifications and experience set out in the Verification Protocol has been contracted to implement Edo BEST in JSS in Edo State</td>
<td><strong>DLR#2.1:</strong> 1 million</td>
</tr>
<tr>
<td>Year 1</td>
<td>DLR #2.2: An EdoBEST package for JSS, including content and materials, have been developed per criteria set out in the Verification Protocol</td>
</tr>
<tr>
<td>Year 2</td>
<td>DLR #2.4: Percentage of all JSS in Edo State are using EdoBEST per minimum criteria set out in the Verification Protocol, as measured as of the end of Program Year 2.</td>
</tr>
<tr>
<td>Year 3</td>
<td>DLI #2.6: Percentage of all JSS in Edo State implementing EdoBEST per minimum criteria defined in the Verification Protocol, as measured as of the end of Program Year 3.</td>
</tr>
<tr>
<td>Year 4</td>
<td>DLR #2.7: Percentage of all JSS in Edo State implementing EdoBEST in line with minimum criteria defined in the Verification Protocol, as measured as of the end of Program Year 4.</td>
</tr>
</tbody>
</table>

### DLI #3: Development and implementation of EdoBEST@Home program to support students outside school

<table>
<thead>
<tr>
<th>Type of DLI</th>
<th>Scalability</th>
<th>Unit of Measure</th>
<th>Total Allocated Amount (USD)</th>
<th>As % of Total Financing Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Percentage</td>
<td>10 million</td>
<td>14%</td>
<td></td>
</tr>
</tbody>
</table>

### Period Value

<table>
<thead>
<tr>
<th>Baseline</th>
</tr>
</thead>
</table>

#### Year 0 (prior results)

DLR#3.1: Edo BEST @Home program components developed for Primary and JSS which includes;
- Digital Self Study activity packs for students
- Mobile quizzes for students
- Story books for independent reading
- Lesson guides for parents
- Interactive Radio lessons
- Teacher training for remote learning program developed

5 million

#### Year 1

DLR#3.2: At least 20% of students have access to @Home study resources

DLR 3.2: 0.5 million
DLR 3.3: 0.5 million
| Year 2 | DLR#3.4: At least 40% of students have access to @Home study resources DLR #3.5: At least 50% of teachers complete an online course on how to support remote learning DLR #3.6: SUBEB has (i) evaluated the implementation of the EdoBEST @Home program; and (ii) incorporated the results of the assessment into the revised program | DLR 3.4: 0.5 million DLR 3.5: 0.5 million DLR 3.6: 0.5 million |
| Year 3 | DLR#3.7: At least 75% of students have access to @Home study materials DLR#3.8: At least 50% of teachers complete an online course on how to support remote learning | DLR 3.7: 0.5 million DLR 3.8: 0.5 million |
| Year 4 | DLR#3.9: SUBEB has (i) evaluated the implementation of the EdoBEST @Home program; and (ii) incorporated the results of the assessment into the revised program | DLR 3.9: 1.5 million |

**DLI 4**

**Type of DLI**

<table>
<thead>
<tr>
<th>Scalability</th>
<th>Unit of Measure</th>
<th>Total Allocated Amount (USD)</th>
<th>As % of Total Financing Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>5 million</td>
<td>7%</td>
<td></td>
</tr>
</tbody>
</table>

**Baseline**

Some BEMIS foundational elements are in place, but BEMIS not yet established

**Prior results**

| Year 0 | DLR #4.1: The Basic Education Management Information System (BEMIS) has been designed, per criteria set out in the Verification Protocol. | 3 million |
| Year 1 | DLR #4.2: BEMIS is functioning per criteria set out in the Verification Protocol and used for decision making by SUBEB. | 2 million |
| Year 3 | DLR #4.3: A new reward and accountability system with career progression and promotion scheme for teachers and principals, meeting the minimum criteria set out in the Verification Protocol, has been designed. | 2 million |
| Year 4 | | |
### DLI 5

<table>
<thead>
<tr>
<th>Type of DLI</th>
<th>Scalability</th>
<th>Unit of Measure</th>
<th>Total Allocated Amount (USD)</th>
<th>As % of Total Financing Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development and implementation of a Learning Assessment Strategy and System</td>
<td>No</td>
<td>5 million</td>
<td>7%</td>
<td></td>
</tr>
</tbody>
</table>

#### Period

<table>
<thead>
<tr>
<th>Value</th>
<th>Allocated Amount (USD)</th>
<th>Formula</th>
</tr>
</thead>
<tbody>
<tr>
<td>No learning assessment</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Baseline

<table>
<thead>
<tr>
<th>Year 0</th>
<th>DLR #5.1: Learning standards for grades 3, 6 and 9 meeting the criteria set out in the Verification Protocol have been established for primary schools and JSS in Edo State by the Edo State Ministry of Education.</th>
<th>DLR #5.2: A learning assessment strategy and implementation plan meeting the criteria set out in the Verification Protocol has been prepared and approved; an adequate budget line assigned for the implementation of said plan; and the strategy and implementation plan have been piloted per criteria set out in the Verification Protocol.</th>
<th>DLR #5.1: 0.5 million</th>
<th>DLR #5.2: 0.5 million</th>
</tr>
</thead>
<tbody>
<tr>
<td>Year 1</td>
<td>DLR #5.3: A learning assessment of grades 3, 6 and 9 pupils in mathematics, English, and verbal and quantitative reasoning, per standards set out in the Verification Protocol, has been conducted by SUBEB by the end of Program Year 1.</td>
<td></td>
<td>2 million</td>
<td></td>
</tr>
<tr>
<td>Year 2</td>
<td>DLR #5.4: The data gathered under the assessment referred to in DLR#4.3 above has been analyzed by SUBEB and its findings have been reported and disseminated, per criteria set out in the Verification Protocol, by the end of Program Year 2.</td>
<td></td>
<td>1 million</td>
<td></td>
</tr>
<tr>
<td>Year 3</td>
<td>DLR #5.5: An additional learning assessment of grades 3, 6 and 9 pupils in mathematics and English has been conducted by SUBEB; the data gathered has been analyzed; and its findings reported and disseminated, all per criteria set out in the Verification Protocol, by the end of Program Year 3.</td>
<td></td>
<td>1 million</td>
<td></td>
</tr>
</tbody>
</table>

### DLI 6

<table>
<thead>
<tr>
<th>Type of DLI</th>
<th>Scalability</th>
<th>Unit of Measure</th>
<th>Total Allocated Amount (USD)</th>
<th>As % of Total Financing Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality assurance and accreditation of pre-service programs</td>
<td>No</td>
<td>5 million</td>
<td>7%</td>
<td></td>
</tr>
</tbody>
</table>

#### Period

<table>
<thead>
<tr>
<th>Value</th>
<th>Allocated Amount (USD)</th>
<th>Formula</th>
</tr>
</thead>
<tbody>
<tr>
<td>No learning assessment</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Baseline

<table>
<thead>
<tr>
<th>Year 0</th>
<th>DLR #6.1: A Quality Assurance (QA) unit has been established within the College of Education (COE), with orientation and training of staff based on NCCE guidelines and toolkit, with minimum staffing and mandate set out in the Verification Protocol.</th>
<th>DLR #6.2: A process has been initiated with NCCE for the initial accreditation of primary and junior secondary programs including the minimum steps set out in the Verification Protocol.</th>
<th>DLR#6.1: 0.5 million</th>
<th>DLR#6.2: 0.5 million</th>
</tr>
</thead>
<tbody>
<tr>
<td>Year 1</td>
<td>DLR #6.3: A QA self-assessment using the QA toolkit has been conducted by the COE and a report</td>
<td>DLR #6.4: Adequate faculty and programs have</td>
<td>DLR #6.5 Linkages and partnerships between the MOE,</td>
<td>DLR#6.3: 0.5 million</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Setting out the results thereof, including a detailed plan for improvement with related budget, has been issued, by the end of Program Year 1.

been put in place for at least 3 new NCE pre-service programs, with a CPDC program implemented and at least 2 teacher educators certified per program, all per criteria set out in the Verification Protocol, by the end of Program Year 1.

SUBEB, the COE and the EdoBEST Schools have been established in line with the Teacher Development Programme (TDP) Manual on Linkages and Partnerships, by the end of Program Year 1.

<table>
<thead>
<tr>
<th>Year</th>
<th>DLR</th>
<th>Description</th>
<th>Allocated Amount (USD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Year 2</td>
<td>DLR #6.6</td>
<td>A second QA self-assessment using the QA toolkit and production of report that includes areas for improvement, detailed for improvement with budget, by the end of Program Year 2.</td>
<td>0.5 million</td>
</tr>
<tr>
<td>Year 3</td>
<td>DLR #6.7</td>
<td>At least 3 programs have undergone the accreditation process with NCCE and receive at least provisionary accreditation status</td>
<td>1 million</td>
</tr>
<tr>
<td>Year 4</td>
<td>DLR #6.8</td>
<td>At least 300 qualified pre-service teachers have been accredited under a new curriculum by the COE, by the end of Program Year 4.</td>
<td>1 million</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of DLI</th>
<th>Scalability</th>
<th>Unit of Measure</th>
<th>Total Allocated Amount (USD)</th>
<th>As % of Total Financing Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>Milestone</td>
<td>10 million</td>
<td>14%</td>
<td></td>
</tr>
<tr>
<td>Period</td>
<td>Value</td>
<td>Allocated Amount (USD)</td>
<td>Formula</td>
<td></td>
</tr>
<tr>
<td>Baseline</td>
<td>Absence of Board of Directors and lack of PPP framework model</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 0 (Prior results)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 1</td>
<td>Establishment of Board of Directors</td>
<td>5 million</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 2</td>
<td>Establishment of PPP Model</td>
<td>5 million</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 4</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of DLI</th>
<th>Scalability</th>
<th>Unit of Measure</th>
<th>Total Allocated Amount (USD)</th>
<th>As % of Total Financing Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number</td>
<td>5 million</td>
<td>7 %</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Period</td>
<td>Value</td>
<td>Allocated Amount (USD)</td>
<td>Formula</td>
<td></td>
</tr>
<tr>
<td>Baseline</td>
<td>10,000 individuals trained, incubated or hosted at Benin City hub</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 0 (Prior results)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 2</td>
<td>Digital skills and digital entrepreneurship training for 20,000</td>
<td>2 million</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 3</td>
<td>Digital skills and digital entrepreneurship training for 30,000 youth</td>
<td>2 million</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year 4</td>
<td>Digital Skills and digital entrepreneurship training for 40,000 youth</td>
<td>1 million</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**DLI 7**: Establishment of a Board of Directors to provide strategic, policy guidance including establishment of a PPP model to encourage and support private sector participation in training delivery at the innovation hubs.
APPENDIX 2: MDAs AND PRIVATE SECTOR GROUPS VISITED IN EDO STATE AS PART OF THE ESSA FOR EDO STATE ECONOMIC ECONOMIC TRANSFORMATION PROGRAM P FOR R– (PROGRAM FOR INVESTMENT AND JOBS)

- Ministry of Environment and sustainability including its MDAs (Forestry, waste management etc.)
- Edo State Emergency Management Agency (or the agency responsible for emergency and disaster management)
- Ministry of Physical planning and Urban Development
- Ministry of Gender Affairs – Or Agency responsible for gender affairs
- EDO Geographic Information System
- Ministry of Women affairs and Social Development including its MDAs
- Edo State Universal Basic Education Board- Specifically Edo Basic Education Sector Transformation (BEST) carried out in collaboration with Bridge International Academies
- Ministry of Infrastructure
- Edo Digital Innovation Hub
- Edo Investment Promotion Office/One stop shop
- Edo Public Private Partnership Unit
- Edo State Skills Development Agency
- Edo State Internal Revenue Board/Service
- Edo State Ministry of Lands
- Agency or Ministry responsible for business permit and business and cooperative registration in the State – Not Corporate Affairs Commission
- Any other relevant Ministries and MDA
- Edo State Entity for Anti Human Trafficking/Illegal Migration and Sexual Exploitation
- Ministry that is responsible for needs of people with disabilities

Private Sector (Need to confirm some information provided by the state regarding relationship with private sector practitioners)

- Edo State Chamber of Commerce
- Nigeria Manufacturers Association, Edo State Branch
- Nigeria Society of Engineers, Edo State Chapter
- Other private practitioners association e.g., hotel owners association, farmers association, NARTO, private medical practitioners association etc.
- Any Small and Medium Scale Enterprises Organization in Edo State

None State Actors:

NGOs e.g. the Initiative for Youth Awareness on Migration, Immigration, Development and Reintegration, (IYAMIDR), etc.

CSOs – Identified/active CSOs in the State
Questions and Discussion Points during Consultation and Interaction regarding Edo State Economic Transformation Program PforR

Purpose of the Consultation: – to listen understand the concerns of different stakeholders especially the people that are likely to be impacted by the proposed project and to collaboratively provide mitigating solutions that will inform the design of the project in order to achieve the project development objective (create an enabling environment for mobilizing private investment in Edo State) and the expected project results.

Questions/Discussion Points

1. For all ministries and agencies- Functions & responsibilities, duties, mandate, Capcities to deal with environmental and social issues including assessments, etc. What are your legal and regulatory powers? What permits & licenses do you issue (for example for ministry of environment, land, investment promotion)? Interaction and coordination between Federal & State bodies, complementary & competing roles.

2. For all ministries and agencies - Enforcement & prosecutions – what are your powers, how effective are they? Have you ever taken action against defaulters of environmental regulations, environmental and social assessment practices in projects and infrastructure development, persons involved in gender violence e.g. Rape/assault etc – give examples?

3. For all ministries and agencies - Policies and strategic role – objectives, documents, action plans, etc., particularly with respect to relationship with industries and private sector.

4. For all ministries and agencies - Staffing and facilities to perform functions: how many, organisation, training, general level of environmental & social awareness, constraints and limitations.

5. For all ministries and agencies - How are public complaints channelled to them, and what is the process for handling & resolving them?

6. For Ministry of Environment - Do you have any “state of the environment” or baseline studies for the State – current environmental conditions, environmental quality, land use, vegetation, water resource? Do you have environment, health and safety guidelines for different industrial cluster in the state? What is the collaboration with other MDAs like the forestry department and the Edo state waste management authority? What are their mandates within the broader state ministry of environment agenda? What are the relevant Edo State Environmental and Social Standard’s policies, laws, edicts and act for mitigating risk and impacts that can result from projects? Who/which agency/entity is responsible for their enforcement? How is the enforcement regime like? What are the constraints etc and how can the identified constraints be addressed?

7. For State emergency Management Agency- How do they handle emergency situations, emergency preparedness, private sector participation etc?
8. Maps showing land use, ecologically sensitive and protected areas, parks, etc. Are these areas under threat from public and private sector activities?

10. For investment promotion office - What is the process for social inclusion in the investment sector? How are stakeholders and communities represented and consulted before development takes place? What is the operation of one stop shop, do investors get all the information and assistance they need including those related to labour relations in the state?

11. For Ministry of Land - What is their interaction with the Town / Urban Planning process? How is/will the state achieve integrated land-use strategies & planning including gender and disability inclusion? Are there State Laws and Approach to Land Acquisition, Restrictions on Land Use and Involuntary Resettlement? Provide details as the case may be.

12. For the concerned ministries and agencies – Provide specific examples of problems & issues with private sector activities – environmental, social, cultural, rural communities, displacement /resettlement.

13. What do you consider to be the nature and extent of any threat (especially environmental and social) from present or future infrastructure development, industrial and other private sector activity in the State? How important is this in relation to other environmental and social threats in the State?

14. Edo Geographic information system: What is their mandate? What are the state regulations and policies guarding land acquisition? What is their role in land acquisition and compensation land? What is the process for acquiring land (either for government use of private use?) in the state and which other agencies of government is involved in land acquisition and compensation process in the state? What is the coordination with these, and other agencies of government involved in the land acquisition and compensation process?

15. Ministry of infrastructure: What due diligence process does the state adopt prior to commencement of any infrastructural works in the state? What are the environmental and social considerations that must be adhered to prior to, during and after the infrastructural works?

16. Ministry of women affair and social development. What is their mandate? Which other MDA are involved in the ministry activities? What are the state policies on gender, disability and gender-based violence in the state and the state plans in addressing them?
APPENDIX 3: STAKEHOLDER ENGAGEMENT WITH EDO STATE GOVERNMENT OFFICIALS HELD AT THE SSG’S OFFICE, GOVT HOUSE, GRA, BENIN ON 16TH SEPTEMBER 2019

1. OPENING

1. The meeting started at 3:25pm with the World Bank consultant, Dr Nnaemeka Chukwuone introducing himself and his assistant, Dr Innocent Ifelunini after which the Edo State government officials introduced themselves. Dr Chukwuone began the meeting by explaining the aim of the meeting which was to interact on the Edo Economic Transformation Program PforR (Performance for Result)\(^5\) which will involve different MDAs of government. He noted that he had earlier sent an advanced document detailing the content of the interaction but however emphasized that some of the issues may not be exhausted in the course of the discussion requesting that the different MDAs could provide him with the relevant documents where available. Essentially the meeting will aim to ensure that those issues that will affect the program are sorted out so that the program can produce the expected results.

2. INTERVIEW WITH HON COMMISSIONER FOR ENVIRONMENT

2. The World Bank Consultant began the deliberation with the Commissioner of Environment and sought to know the structure of the ministries in Edo State, the laws, the collaboration among Ministries, the environmental management system. He also sought to know the level of collaboration with the Federal ministry.

3. The Commissioner of Environment affirmed that the State has environmental laws and offered to provide the document to the World Bank consultant in the course of the interaction. In terms of staffing, the Commissioner pointed that the Ministry has many staff based on the different departments, namely Forestry department (the Forestry (Commission is underway), Signage, Parks and Garden etc.

4. As regards the enabling laws to enhance policy direction, the Commissioner revealed that there is an environmental policy that is being developed in collaboration with UNIDO for the State of which a copy is in the office. For the policy direction, the Commissioner for Environment noted that the State wants continuity and sustainability and the State does so by collaborating with the federal government. The State draws from federal laws especially in terms of remediation, sanitary laws, etc. However, when there is overlap, the State looks at areas they can draw without conflict, for example the mining laws, taxation etc. For instance, if a miner pays mining royalty in Abuja, Edo State will require such miner to pay for remediation which also helps the State to handle environmental-related problems. The State set up some units such as the EIA, climate change unit, etc.

5. Are there Environmental Laws?- The Commissioner affirmed that the State has environmental laws.

6. How is the EIA Done? Do Companies do the EIA at federal level or State?- The Commissioner affirmed that EIA comes from federal but the State also insists that another EIA be done at the State level to avoid conflict. This is to certify that such operation does not

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\(^5\) This was before the name of the Operation was changed to Edo BESST.
undermine social welfare. For instance, if an EIA is done and operational certificate given at the federal for companies to commence operation in a built-up area, the State will insist that another EIA is done to ascertain the real impact of such project irrespective of the EIA from Abuja. The crux is that the State bears the brunt and not federal government. The citizens will always refer the environmental problems to the State as first contact.

7. **How does the State enforce and manage conflict that may arise when federal gives EIA and the State request another EIA?** - First the commissioner noted that the ministry of environment has a whole unit that is into enforcement. Also, in the terms of State-federal conflict, the Commissioner pointed out that it was not in every instance that conflicts arise. She noted that it was only when the federal EIA does not ‘carry’ the State EIA along in carrying out the certification. The Hon Commissioner noted that until now there used to be conflict between federal and State sometimes even resulting in the closure of such business operation by the State. But in recent time, there has been tremendous improvement as federal now carry the State along in the EIA process (though this is an informal working relationship).

8. **How do you relate with industry in your State in your HSE?** Edo State does not have many industries. Our industry is mostly hospitality (hotels) and they are given the HSE policy guidelines and they equally pay remediation.

9. **How does the Ministry punish environmental offenders?** The law provides for the punishment and equally provides the guidelines.

10. **Does the Ministry have the capacity to enforce?** - The maintained that the ministry has the capacity to enforce noting that they work with mix-breed of civil servants and private sector participants. The commissioner also noted that there exists environmental court in all the Local government areas. Again, the Local governments Chairmen are members of the Clean Edo Committee.

11. **How do you handle the issue of Resettlement?** Sure, the EDOGIS maps out land but what about resettlement? The ministry of environment does not handle the issue of resettlement. The ministry only comes in when it has to do with oil spillage.

12. **Does the Ministry of environment issue permits and what type?** Yes, there are many types such as Forestry permit, permit for PSP, permit for dump site, permit for Timber exploration, Tungya permit, land use permit, chemical storage permit, etc.

13. **How does the Ministry enforce the permit? Does the ministry have enough manpower?** The Hon Commissioner indicated that the ministry has enough manpower and the permit is enforced through different enforcement teams. Such teams include forest rangers, waste
management enforcer, etc. At the ministry level, there is also a mobile court. Local government areas also have enforcers.

14. In terms of the capacity to enforce permits, the Commissioner maintained that the ministry of environment has enough. However, the Commissioner also said that the capacity challenge in the ministry is not in terms of manpower but rather in terms of equipping the available manpower to function optimally. For instance, the Commissioner gave instance with the Forest guards in the forest who are at best equipped with baton while some of the intruders or invaders in the forest carries sophisticated arms and ammunition like AK-47 Riffle. The Commissioner noted that the State needs assistance on extreme enforcement of which the World bank is intervening to help. The State equally needs much better training for Livelihood officers to be better abreast with International good practices.

15. **Does the Remediation paid to the government by miners go to Remediation Fund?** From the Commissioner’s response, the remediation paid by the miners does not go into remediation fund. The Commissioner for environment explained that the remediation is paid only when the miners go beyond the permissible limit. She noted that at a point in Edo State, when the number of burrow pits increased to over 50 and the State asked for remediation fee from miners.

171. **INTERVIEW WITH EDOGIS, INFRASTRUCTURE, PHYSICAL PLANNING & OTHERS**

16. The Director of the EDOGIS started by correcting some things contained in the advanced document sent to them for the interaction. First is that EDOGIS is Edo State Geographic Information Services and second, there is no more Ministry of Land but the EDOGIS has inherited the ministry. The Director thereafter proceeded to list what the EDOGIS does to include:

- Lands Administration
- Documentation of land acquisition
- Compensation and resettlement. He noted that the functions of the establishment/agency are contained in their website.

17. **How does the EDOGIS carry out the Compensation and Resettlement?** The Director pointed out that government does not compensation for land but rather pays for economic activities. He also pointed out that one challenge they usually face with compensation was that once an announcement is made that government intend to develop an area, there would be an influx of people to such location to erect structure so as to ask for compensation, for instance, the Benin Industrial Enterprise Park. What we the government did was to take an aerial photograph/survey of the area and when the State government wanted to start the project people started building on it. Such people that started building after the aerial photographs cannot be paid compensation. In terms of compensation, the State Surveyors value the lands.
18. **Does the State rely on the Prevailing market price or does the state have its own Standard?**
The State brings estate valuers to do the evaluations and where it has to do with agricultural products, team from ministry of Agric does the evaluation. He pointed out that for the optic fiber project, the fiber will be located along high-tension way of which the area is free. The team requested the government officials provide the documents from Ministry of Agric indicating the rates used for evaluation for crops before compensation.

19. What happen to the people that will be displaced for a short time? This is important because the World Bank talks about displacement or resettlement irrespective of the duration? - The State considers only people who are genuinely displaced (legal occupants) and not squatters. A member of the World Bank team emphasized that it is the World Bank policy that if someone either legal or illegal occupant would be impacted by a project, such a person is to be compensated.

20. After much argument on the rationale for compensating an illegal occupant/squatter, the Commissioner for Finance then asked what was the policy as far as the P4R was concerned to which a member of the team affirmed that the World Bank policy would apply. The State government officials argued that this would run parallel to the local laws. A member of the World Bank Team made the government representatives to understand that there are two instances where the bank will support local/country system on the ground, that is, that it would meet al World Bank rules.

21. At this point, the Commissioners for Infrastructure and Finance respectively pointed that the World Bank policy would be adopted only for the World Bank project but wouldn’t be a State policy. The World Bank staff pointed that before the project is finalized and signed, the bank would ensure that people would be compensated appropriately.

22. The World Bank staff requested that the Commissioner of Infrastructure takes the meeting through a process of a project that has been executed in the State and how acquisition was done. He listed the following process as follows:

- First, the Commissioner emphasized that public interest will over-ride private interest regarding land in all circumstances. In acquiring land for the project, if one has legal right to land, the person is paid compensation. On the other hand, if the person encroaches on the government right of way, the people are asked to evacuate the right of way and they are not compensated.

- The state pays compensation for encroaching on people’s property during road expansion (e.g. Airport roads). But for people with movable property who are not landowners, the State only deal with the landowners alone. The EDOGIS brings valuers for evaluation while if it involve crops, the EDOGIS brings valuers from Ministry of Agric
When the State Places due notice and people do not remove their property what does the EDOGIS do?

23. The government does not demolish. The Ministry of Physical Planning goes to the property owners and give due notice

24. How much does the EDOGIS collaborate with other agencies of government? The EDOGIS collaborates well with some other agencies of State government. For instance, the EDOGIS collaborates with the ministry of physical planning in working out appropriate compensation and even in determining when to demolish and compensate. The EDOGIS and other agencies rely on the Urban and Regional Planning law of 1992. The Director of Commissioner of Physical planning agrees to present a document on the process of land acquisition. The clear picture of the process of land acquisition and due diligence before investments is carried out are detailed below:

- Selection of site (comes from PPP office). Identify site and survey is done. If suitable, EDOGIS advises government to revoke the land that is suitable using the legal process.
- Once the interests are identified, evaluation follows
- The PPP office has Grievance Committee with government and community having their consultants
- Acquisition is not complete until compensation is paid

25. The World Bank staff pointed to them that the Bank respects the principle of EMINENT DOMAIN. He also explained to the State government officials that compensation is not paid to people who appear after a cutoff date has been announced by State government.

26. The Commissioner for Infrastructure asked how the State can enumerate squatters given the fact that they are highly mobile. A member of the World Bank team responded to the question drawing insight from a project in Ibadan. He said by basic principle, there was need to identify a market leader who controls the trade and there must be a cut-off point date to avoid such incidence. The World Bank staff said there was a way to deal with such incidence.

27. The Commissioner for Physical Planning pointed out the need to share the ways to deal with such incidence with stakeholders as it will help to enhance operation/efficiency. A World Bank team member further reiterated that Resettlement Action Plan is normally prepared in line with World Bank policy if resettlement should be dome. The State government officials also pointed out that there was a section of the Land Use Act that says the secretary of the Land Use Act advises the government on the compensation to pay.

28. Can the State Government officials provide a document on Resettlement by Edo State government to make it clearer?- The EDOGIS said it is still a work-in-progress. However, what the government is doing is to provide alternative platform for genuine/legal occupants.
There is the EDOGIS law which is the EDOGIS website

29. A request was made by the World Bank team to:
   - Director EDOGIS to provide documents on the regulation/policy that guides land acquisition, compensation etc
   - Commissioner of Infrastructure to provide evidence of inter-agency collaboration or coordination.

30. The State government team noted that there was no personnel/ministry that coordinates others as they are all independent. Nevertheless, they pointed that the State government has an Economic & Strategic Team (EST) which brings projects of all the ministries together in a bid to actualize government cardinal objectives.

31. The Director of EDOGIS was asked how they enforce laws? He explained that the State government is not into enforcement currently but are concentrating on sensitization and enlightenments

32. So how does the EDOGIS handle the issues that arise in the work of the agency (for instance, in the fibred optical expansion project that would take place?) - Our duty is to provide data needed by other agencies to use-inter-agency collaboration. For instance, EDOGIS is currently working with the people in the Forestry department to design how to use the data for degraded area

33. Are there Grievance Redress Mechanism where an aggrieved person can lay complains? They government representatives replied that there was None.

34. A member of the World Bank Team also sought clarification about a law/policy called Anti-CDA law which he feels is counter-productive. The Commissioner for Physical Planning explained that it was not anti-CDA law rather it was a positive law that seeks to protect private investment, come against forceful eviction, double sale of land, etc. Contrary, it was an investment-friendly law.
APPENDIX 4: STAKEHOLDER ENGAGEMENT WITH EDO STATE GOVERNMENT OFFICIALS HELD AT THE SSG’S OFFICE, GOVT HOUSE, GRA, BENIN ON 17TH SEPTEMBER 2019.

Opening

172. The meeting started about 9:30 AM with brief introduction by all present. Thereafter a member of the World Bank team gave a brief of the meeting emphasizing that the aim was purely for interaction with the officials in order to understand government systems and find out gaps that need to be covered in order to facilitate the achievement of the project objective to enhance private sector investment in the Edo State. It was explained to the government officials that the World Bank in funding projects engages with clients and also carries out environmental and social due diligence to ensure that the project achieve its anticipated objectives.

1 Ministry of Social Development & Gender Affairs

173. **Overview, -structure and function, legal framework, policy etc:** The ministry used to be Ministry of Women Affairs & Social Development but recently changed to Ministry of Social Development t and Gender Affairs.

174. **Mandate:** To empower, protect, and advance the social right of women, children, and people with disabilities in line with international best practice. Also, to mainstream the interest of these group into State Programmes.

175. Thematic Areas: Women empowerment; contributing towards the protection and promotion of children’s welfare; care for persons with disabilities; protection and promotion of reproductive and sexual rights of women, etc. The Commissioner of Min. of Social Development and Gender Affairs noted that in the ministry’s operation take recourse to international treaty at the international or regional as well as national laws. For instance, the Violence Against Person Prohibition Act of 2015 was domesticated in the State in February 2019. Other Acts include:

- Law on Trafficking in Person also domesticated in the State
- Child Right Act is also domesticated and currently under review
- Law against female genital mutilation
- Law against widowhood practice in Edo State

176. However, the Commissioner pointed that Risk and Disaster Management is no longer domiciled in the Gender ministry but it’s being handled by some other Agency (State Emergency Management Agency).

177. In essence, the ministry focuses on issues relating to women; men (vulnerability); children in correctional homes; family issues; social welfare as well as addressing the issue of migration and adoption.

178. There is currently a National law on People Living with Disability which is about being
domesticated in the State (currently with the State Governor)

- There is Edo State Child’s law
- Child’s protection law of Edo State
- Understanding my basic right as a child
- Law on Violence Against Children in Nigeria is being domesticated in Edo State
- Child protection system; strengthening and mainstreaming child protection; National Gender Policy as well as Gender mainstreaming are in the process of being domesticated in Edo State.
- Violence Against Person Prohibition Law has been passed through a collaborative work among the Ministry of Gender, Non-Governmental Organization, and State House of Assembly.

179. There is also Children’s Correctional Centre which has skill acquisition Centre and the children in the correctional facility are learning skills. The Commissioner emphasized that the influx of women and children migrating to Edo State from Northern Nigeria is swelling the population of refugee/migrants that the ministry must handle. The Commissioner noted that some of the migrants are roaming and begging because the space currently provided by government cannot accommodate them. There is also the issue of child labour (the children are supposed to be in school).

180. The Ministry is also collaborating with the Agency for HIV which takes care of children living with HIV whose parents are dead. There is currently a Nigeria for Women project in 3 LGAs and in 3 Senatorial zones in Edo State to empower 18000 women. The Gender ministry is advocating for the expansion of the programme to the 18 LGAs stressing that the programme will enhance the achievement of the economic transformation agenda.

181. The office of the Her Excellency (wife of the Governor) has come up with some initiatives to support in combating human trafficking.

182. Are there Anti-Migration Law? Is it under the Gender ministry, and what is it about? There is an anti-trafficking law in the State which is one of the tools which the Gender ministry uses. Her excellency has a lot of interventions geared towards assisting girls and returnee migrants. Such interventions include:

- Betty Angel Shelter which helps returnee women;
- There is also a motor mechanic Centre which has been helping to train women mechanic;
- There is the AFTER-SCHOOL CLUB where children that finish school can learn work;

183. In partnership with Ihogbe College she has ensured that people living with disability are catered for. There is also the office of the Special Adviser on Gender and other MDAs-Min of Wealth Creation, Min of Agric, etc working to actualize gender mainstreaming goals

GAPS/AREAS OF NEED
Policy Objectives

184. Needs to develop policy. For instance, the ministry needs assistance to develop policy on
Gender in Edo State
- Needs to develop policy on gender mainstreaming
- There is dearth of gender technical experts
- Needs capacity building on gender budgeting, monitoring, and evaluation
- Training on research as well as data collection
- Build the capacity of Legislature and Judiciary for fast-tracking gender issues. This will involve training on perception change.
- Training of staff of gender ministry on Alternative Dispute Resolution (ADR)
- In fact, there is need to organize advocacy and enlightenment. To achieve this, the governor appointed the Special Adviser on Gender as coordinators in the 18 LGA
- Harmful Religion and Social biases
- The communities need to know about the Violence Against Person (VAP)
- Women suffer violence because they are more vulnerable. Programme should be designed in such a way that they are rehabilitated

Economic Empowerment
- Investment in power/power generation. The Commissioner for Gender appeals for this because the initiative by the State Governor (Benin Enterprise Industrial Park) will require power and will also be used by the youths
- Developing the capacity of women and men
- There should be modern or state-of-the-art Skill Acquisition Centre in the 18 LGAs
- Fund should be provided for women for modern large-scale farming
- Needs to develop Victim Rehabilitation Package
- Provision of standardized shelter for the victim’s human trafficking
- There should be empowerment for women in politics in Edo State. In Edo State, there is currently no woman in the House of Assembly and only 4 women (out of 18 Commissioners) at the Executive council. This makes difficult to effectively represent the interests of women when it comes to laws and policies that need deliberation. There should be gender mainstreaming in political party constitutions

185. Does your ministry collaborate with other bodies or agencies? There is collaboration with the Wealth Creation office, Ministry of Justice etc. But the Gender ministry needs intervention in building Correctional homes; ultra-modern rehabilitation homes, psychosocial support for our providers of psycho-socio to people; the state of women Prisons is cannot pass for minimum acceptable standard

186. Issues of law in relation to women in Edo State? Right of ownership of land: There is no gender disparity in acquisition of land; it is based on effective demand (whoever has the
money buys without hinderance). However, in terms of inheritance, the girl child is disinherited in some part of Edo State (e.g. Esan culture). Very few cultures/traditions in Edo State give inheritance to the girl-child. The Benin people tend to be more liberal in this aspect.

187. **If husband and wife acquire landed property and the husband dies before the wife, can the wife inherit the property?** It is the woman’s children that inherit the property not the woman. Under certain Act, the woman can enjoy little privilege but in native law and custom the woman does not inherit property.

188. Are there ways these traditional/cultural practices can be changed? Is the government thinking/having framework to address such challenge? - some of the government officials maintained that it will be difficult to change such as most of the people who design the policies are men and some enjoy the skewed treatment. However, they noted that there is increasing awareness of the need to jettison such practice. Some people have started according women right to land but it is usually based on liberal understanding of some families.

189. There is need to document how gender-based violence in terms of land inheritance is addressed. The ministry should be able to document the capacity of the ministry to address such challenge.

190. Has there been an issue of project that involves Resettlement and the ministry was involved? - No

**Anti-Trafficking**

- There is constant menace of human trafficking. The rehabilitation & resettlement of traffickers (about 4000).
- The anti-trafficking task force works with the board of internal revenue to profile the victims
- The anti-trafficking task force also involve in enlightenment especially in those highly endemic areas
- The gender ministry carries out research on root cause of trafficking
- Perception study
- In-house tracking etc

**Sexual and Gender-Based Response Team**

Came into being in January 18, 2019
Got almost a full building in UBTH and ROCAL will equip the Centre
Social work for social justice

2 STATE EMERGENCY MANAGEMENT AGENCY
20. **What is the primary responsibility of SEMA, structure and laws governing the work of the agency?**

SEMA is the umbrella body saddled with the responsibility of coordinating other emergency management related agencies. It came by virtue of NEMA Act. Edo State is working towards domesticating the law. The draft is already with the ministry of Justice waiting to be sent to House of Assembly. SEMA functions include:

- Building community resilience in terms of emergency management
- Firefighting, flood, erosion control etc
- General life-saving activities

191. Until now, SEMA used to look like relief agency but the agency is now in the 18 LGAs-Local government emergency management committee. Its organogram include the Governor/Representative and other stakeholders. The agency’s operation has been made easier through its partnership with Nigeria Communications Commission (NCC) and has built emergency management centre. The agency also has a toll free line which can be called at any time and citizens are linked to the department of his/her concern.

**Issue of flooding (Erosion and Riverine Communities)**

Almost all the 18 LGAs in Edo State experience flooding due to anthropogenic factors not because of infrastructural deficit. These factors include:

- Building on flood drain/channels
- Indiscriminate dumbing of refuse

192. SEMA has been carrying out sensitization/public enlightenment. For instance, in 2018, SEMA collaborated with the ECOWAS Early Warning Network to organize a workshop to sensitize the people on flooding and its causes. The government needs fund to build more roads and more drainages. Also needs fund to build more reservoirs. The agency derives its policy from the National

**Process with Which they Manage Emergency**

- Flooding every year (3 LGAs effected);
- Work in collaboration with NEIMET. NEIMET communicates SEMA about annual prediction of flood and other disaster. SEMA carries on the spot advocacy to sensitize the people on emergency “Red Alert”
- Continuous sensitization
- Set up IDP camp to evacuate the people that will/were affected. There is a permanent IDP camp with a capacity of 2000 people that was provided by the Presidential Committee on flooding but furnished by State government
- When there is an alert, the agency moves into the villages and evacuate.
- Assuming there is call on fire incidence.
How long does it take to respond?
The fire Service is as good as non-functional

- No vehicle
- No equipment

22. Currently, the State collaborate with Air Force, University of Benin and other private partners in the State. In some cases, depending on the location. SEMA invites any of the partners.

193. **Are there documented Agreement with these partners?**-No! There is no documented agreement and these stakeholders see it as their Corporate Social Responsibility.

194. **Does you agency collaborate with NEWMAP?**-The agency works mostly with the ministry of Environment. The agency plans for palliative/relief and if it is above what the State can carry, the State involves NEMA.

195. **NEWMAP**- The officer from NEWMAP noted that Ministry of Environment collaborate with agency to actualize objectives. She also noted that NEWMAP focuses more on gully erosion to ensure that the effect is reduced. She noted that ESMP helps to specify the roles of relevant agencies. There was an advice that subsequently, ESMP should be given to SEMA for them to be abreast with it. Some other officials suggested that upon completion of construction, the emergency agency should visit such site. For instance, areas like market should have entry and exit. The emergency agency should enlighten people too.

196. **How many cases has SEMA done?**-the agency collaborates with family unit at the Criminal Investigation Department (CID). The family unit at the CID goes to court on behalf of the collaboration

197. **Overview of GBV Response and Referral Pathway?**- The agency has not kick-started full activities on this. They have only gone on functional sensitization. The Centres are not yet operational. The Stella Obasanjo Centre will begin in few weeks. The gender-based Response Team appeals that once the Centres take off, that they will need a big Centre. In response, Elijah explained that the choice of activities to include in the P4R program lies with the State government.

198. Are there platform for Returning Migrants because of Psychosocial Issues? The agency collaborates with the Anti-migration teams. The agency hopes to send returning migrants to GBV Centre when it comes on board

3 EDSUBEB & EDO BEST

28. **Can we know about EDSUBEB & EDOBEST** -SUBEB (State Universal Basic Education Board) is a creation of the law for the management and control of primary school. In EDOBEST initiative, Edo State government collaborates with a private agency, Bridge Technologies International.
199. EDOBEST-Edo best education sector has five pillars:
   • System strengthening
   • Professional development
   • Curriculum development and learning
   • Community engagement
   • School infrastructure development

200. Until Nov. 2017, there was scarcity of information about the condition of schools in Edo State.

201. In February 2018, EDOBEST carried out a diagnostic assessment to understand the pupils’ learning level on the foundation subjects.
   • This was used to develop the curriculum
   • In April 1500 teachers were trained
   • 203 schools were used for a pilot
   • There was a pilot programme that focused on pupils
   • The packages of the pilot programme include:
     i. Teachers’ computer/tablets
     ii. Smart phone

202. The focus was on Nigerian curriculum, lesson plan, and remediation aligned to the textbook

Support team
203. Knowledge development officers-these officers carry out short and long form observation. The short form observation last for about 5 minutes while the long form observation entails the entire period monitoring everything that happens in the class

Coordination Officer
The functions include the following:
   • Collation (Checking facilities)
   • Key observation. They help to understand facilities and learning gap for remediation
   • Support with monitoring
   • Checkmate truancy among teachers

204. The benefit of EDO BEST is that it provides a lot of data to be able to ask questions about what is happening in the school system

205. Was the training a one-off thing or it continues?- The Development officers have 5
persons and each school is visited once a week.

206. Capacity to manage what is happening: The focus has shifted from the field officer to work closely with service officer.

207. One of the challenges has to do with computer operation

208. Does the SUBEB have policy -Yes. The SUBEB officials noted that one challenge of SUBEB is continuity pointing that pupils are graduation from primary six to JSS 1-3 and their fear is what happens next. What will happen when they leave Basic education which covers up to JSS3?

209. EDO BEST AND OUT-OF -SCHOOL Children: The officials revealed that the State government has approved the establishment of learning Centre at the ward level (in every ward). However, the official noted that there is no policy covering the operation for now. There is the need for policy to help even Edo State and makes the EDO BEST program sustainable

210. Where is the place of the children in the EDO BEST technologies with their focus for issuance of tablets focused more on teachers? There is plan to integrate the Edo ICT hub to the programme in this regard For MainOne, there are some schools that have been selected. However, the officer from NEWMAP pointed that there could be environmental issue that will arise because of the number of tablets that the teachers will use. It is important to factor how the disposal will be because more tablets will be coming in. Managing e-waste is not usually easy

4 MANUFACTURERS ASSOCIATION OF NIGERIA (MAN)-WITH LUCKY AMACHREE (EDO/DELTA CHAIRMAN)

40. Organisations that make up MAN:

- Manufacturing and assembling companies
- Assemblers of motorcycle
- Producers of bottle water etc.

211. How is investment in Edo State?-Investment is fair. There would have been more investment in the State, but multiple taxation is one of the major issues.

212. Government is making effort in terms of ease of doing business, but the impact is not readily felt for now.

213. Energy is a major problem. Energy consists about 70% of business running costs and bad roads
214. What is the experience in terms of ease of doing business? Registration/renewal of business is very cumbersome and very expensive. Renewal of business permit is supposed to be N10,000 (Ten Thousand naira) but it is higher here. Again, in Lagos State, there is a list of approved taxes and all payments, but it is not the case in Edo State. This gives room for exploitation.

215. Until today’s (17TH September 2019) meeting with government officials, the MAN chairman said they were not aware of laws guiding business operation in the state.

216. Land use charge is another area. According to him, a person once bought a piece of land and didn’t use it for some time only to be given a charge of N400,000 to pay. Although the government used its discretion to wave 70% after our intervention and this made the person to sell off the land instead of investing in it. In Ogun State for instance, government makes purchase of land easy. However, the Chairman noted that the Commissioner asked MAN to articulate their concerns for a meeting on September 20, 2019.

217. **How does it take to register a business?** Currently, it takes more than one month. It is not supposed to be so. He maintained that they have requested government to articulate the process and taxes in a document so that investors know what to pay etc.

218. Is the One-Stop-Shop working? I doubt it is functional at present. Maybe it is beginning to work now. For instance, there is a new haulage tax where 30-ton truck pays N4000 per trip. MAN has suggested to government to reduce it to 2000 naira for 30 ton and 1000 naira for less and to grant concession to haulage companies.

219. In Ogun State, it is 2000 naira for big trucks and 1000 naira for small ones. Power companies on the other hand gives estimated bill which worsen the case. Government should make the environment comfortable. Government should improve the condition to encourage and attract investors into the State and provide employment and reduce social vices.

220. On a scale of 1 to 10, how do you rate the State? I will rate the State 4. This is because the condition is not satisfactory but there is the willingness on the part of the government to implement some initiatives that will improve the business environment.
APPENDIX 5: STAKEHOLDER ENGAGEMENT WITH EDO STATE GOVERNMENT OFFICIALS HELD AT THE SSG’S OFFICE, GOVT HOUSE, GRA, BENIN ON 18TH SEPTEMBER 2019.

1 Edo Investment Promotion (Director)

Overview of the office and structure, legal/policy guiding operation

The Edo Investment promotion is a reform initiative hinged on 6 thematic pillars. It aims to:

- Facilitating investment into the State and showcase the Business opportunities in Edo State;
- Stand where businesses have challenge;
- Showcase Edo State as an investment destination under which the agency works with many MDAs depending on their areas of coverage and what the MDAs can offer;
- It is like customer service centre and makes sure that investment/businesses are seamless;
- Has an investment bill with the executive;
- Derive its policy from the National Investment Promotion;

It has carried out the Nigerian Investment Certificate Programme to show that Edo State is investment ready. It is about to be certified (90% ready) by Nigerian Investment Certificate Programme held in 2017 with many foreign investors coming into the Edo State.

There is also a One-Stop-Shop-A work-in-progress with offices in all the MDAs About to go into peer review with other 2 IPA -Lagos and Kaduna

Had sector scan with DFID and UKAID to identify investment opportunities

Work closely with Ministries of Wealth Creation, Agric, Skills Development Agency etc

Had stakeholder meeting with the business community

There is now a better working relationship with National Agencies unlike before now. There is also unison and collaboration with sister agencies.

Also work with the Public Private Partnership office in Edo State

The next step is to put process right

Since inception, have you had any relationship with any investor?

Yes. The agency has done a great deal. There is an industrial park and the agency is making effort to get investors there.

Uber is in Benin (about 4 months old)

From private sector side, the government is providing enabling environment

Market Square has also come into the State

There are hotels also

Are there any investor that came because of Edo Investment promotion talking to them?

From the response, there doesn’t seem to be any. But the Director noted that the Investment promotion office has sister agencies in the State that also work with them. And that these agencies attract investors as well.
Suggestions

- It was suggested that the One-Stop-Shop will be important so that an investor coming into the State knows what and where (which MDA) he is to pay for any service.
- There should be reasonable level of independence to enhance investors’ confidence
- The new Edo Investment Promotion Office can serve as a One-Stop-Shop and there build a good website so that investors are conversant with the agency’s operation. Again, instead of the agency having offices in all the MDAs, there could be different desk created for different operation at the One-Stop-shop. For example, internal revenue, business registration etc

2 DIGITAL INNOVATION HUB

It is established by government. It is into ICT which it uses to create jobs for the youth. The innovation hub is doing a lot in helping entrepreneurs to enhance their business operations.

There are also programmes for start-ups. For instance, there are companies in the innovation hub to assist new start-ups

Partnering with Siemens, Amazon Impact Hub to train the youths in data management, programming, basic digital skills, and artificial intelligence

The innovation hub partnered with Siemens to launch a prototype in Edo State

The hub has partnered with Amazon to train not less than 50 youths on cloud computing using the Amazon Web Service Program which builds capacity on cloud computing

The innovation hub has introduced a competition to take business to another level

The hub is providing room for capacity building and technology-driven solutions to problems

Edo Jobbers (graduates of the Edo Skill Development Agency) are provided a place at the innovation hub where they can have access to internet

The innovation hub also provides training for those who do not want to go into business

MainOne is setting up business at the hub

The innovation hub work with CAD Centre to train people on electrical design especially people with little engineering background

They also provide training for people who do not have access to secondary education—it is a one-year programme in partnership with OXFAM.

The Director emphasized that their programmes are always linked to industry

As at June 2019, over 30,000 people have passed through the innovation hub

As at June 14, 2018, over 21,000 have passed through Edo Innovate

America Tower Company donated 4 ICT Centres to Edo Innovate
Do you have information on the digital infrastructure project? - The Director could not provide the information but said that the hub collaborates with Main One.

**Capacity of the Agency to Handle the training**

There is an increasing demand for the services of the hub (more people want to key into what the hub is doing). Hence there is the need for increased capacity. The Director said if the agency could get 50 more hands it will be fine. In addition, more opportunities are opening in Edo State and the hub will also want to tap into such opportunities and this requires increased capacity.

**Does the Hub have issues coming up in terms of gender**

There is a Centre for women

There is programme for women in business

HP life

Girl Lead is a programme dedicated to young girls of secondary school age

All programmes in the Centre have 50% women participation.

**How does the agency deal with issue of Gender Based Violence? Are there plans?**

Gender is taken care of. But if we encounter gender issue, it is referred to the ministry of Gender and Social Issues.

However, the agency holds regular sessions with women.

**How much of the agency’s input goes into EDO BEST programme?**

Training of teachers on how to use the technology

The Director noted that the agency comes at the adoption side and not at the design angle.

### 3 BOARD OF INTERNAL REVENUE

The Chairman provided the law document and promised to send the organogram.

The Board has 6 critical success factors:

- Human capacity

  Technology is critical to solve multiple taxation

  Stakeholders’ engagement is a critical factor for the public to understand the activities of the board

  Value for money

  Legal and regulatory framework

  The stakeholders’ engagement as well as the legal and regulatory framework are two more strategic factors

  The Board employed a Tax and Enlightenment team to profile business people

  Payment of revenue is purely through technology

  The tax team generate assessment form for potential taxpayers
There is a single tax payer liability platform. Thereby trying to have service for benefits

**Does the Board have enough capacity (manpower and knowledge system)?**
The Board has 280 core staff. We have the capacity to manage but anytime we discovered deficit we seek for assistance

**Does the Board have enough data base?**
The Board has working agreement with deposit money banks for data, helping to capture potential taxpayers.
The data base has increased from 180,000 to over 300000.
As regards dealing with conflicts, the board start by serving notice and wait for payers to pay. When there is default, the Board goes to court

**Does the Board have street enforcers?**
The Board has single point of collection and goes to the bank-

local government are the collectors

the unions are on the field

the Board also has an in-house enforcement team (about 10 of them)

**How does the board resolve conflict from enforcement?**
There is no incidence currently (there is a joint State and local government collection committee headed by the Deputy Governor). There is an understanding among the members

There is a Revenue Assessment Review Committee which addresses issues that has to do with assessment

There is also an automation system that captures everything a payer is to pay. These are contained in the board website

**It appears there are other agencies that collect revenue hence the problem of multiple taxation**
Other agencies generate revenue, but we are the only collection agency

The Chairman emphasized that the Board collaborates with some other agencies

**The issue of Haulage tax was raised**
The chairman explained that the haulage companies were not placing the facts right. The companies (7UP and Nigeria Bottling Company) were asking for blanket payment of N2.5Million per annum. But the Board is requesting to have a traffic count of their haulage vehicles and franchise as this will better equip the government to consider appropriate concession.

4 **PUBLIC-PRIVATE PARTNERSHIP (PPP) OFFICE**
Established in 2012 under the governor’s office.
Set up to mobilize funds for development projects by attracting private

Ensures that PPP projects are part of sectorial plans

Collaborate with various MDAs depending on the work at hand

Do value for money assessment by working with transaction adviser

In terms of capacity, the PPP office has 12-man team. It has:

- Technical adviser
- Legal adviser
- Field officer

The office usually request for project managers for projects from Ministries to ensure technical inputs

Some work done

“Azura” Independent Power Plant

Benin Enterprise Industrial Park, etc

Sapele Road, Benin City was identified for the industrial park because it was strategic. Many industrial park (sits on less than 1000 hectares). The idea was to have 13 zones industrial park

Various zones consideration

- Raw materials
- Contribution to GDP
- Import/export importance

In terms of work done, the office has done acquisition, ESIA, RAP, and enumeration. The State contribution is usually in terms of Land

The office is collaborating with Ayamaya which has a network of in the industrial park project. Ayamaya has network of global investors

The office has met with some other potential investors

Does the PPP have any law?

The bill is currently with the executive

In the absence of the bill, the office seek executive approval and gazette to engender investors’ confidence

How does the PPP deal with Environmental and Social issue?

The agreement signed by the office signs always covers socioeconomic issues based on survey
The office always identified stakeholders-both inside and outside
The office equally documents/have a register of the issues gathered through the interaction with stakeholders
There is currently the Benin River Port. It is to be concession for 45 years
The Port has a 49-kilometer feeder road that connects through the city to the Benin bypass.

5 WEALTH CREATION MINISTRY
Mandate:
Create wealth for the people through programmes and empowerment
They run the CBN-MSME programme
Provides fund to SMEs through Microfinance Banks as specified in the banks’ guidelines
It is the Secretariat of the Technical Committee on Privatization and Commercialization of government enterprises
Handled business premises and registration

Achievements
Has given loan to SMEs about N500Million
CBN-MSME fund about N2bn with 60% of beneficiaries being women
The office has not been emphasizing on social and environmental standards. The office shall begin to factor this into its consideration
There is no specific law that guide the operation of the ministry. The ministry operates with gazette for Commerce and Industry

Does the office capture the number of industries in the State? Number of SMEs in categories and the number you have given loans in the different category-services, manufacturing both the CBN and BOI interventions.
Yes. The ministry was advised on the following:
• It will be good for the Ministry of Wealth Creation Commissioner to begin to think of policy and legal framework for the operation of the ministry

Does the ministry have an organogram?
Yes, with 200 staff. There was a request for the Commissioner to provide the World Bank team with organogram containing the number of people in the ministry and what they do

Does the Ministry use ICT in capturing clients?
Yes. The ministry use ICT for business premises
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Page 101 of 105
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Page 102 of 105
SUMMARY OF VIRTUAL APPRAISAL STAGE CONSULTATION HELD WITH EDO STATE GOVERNMENT AND MDAs HELD ON 30TH APRIL 2020

Introduction

As part of the appraisal process, the safeguards team held additional consultations with the government counterparts including relevant government agencies on the broader safeguards process of the PforR operation and on the outcome/ findings of the ESSA report including roles and responsibilities with a view to finalizing the ESSA disclosure process.

This additional consultations were held with extended limited government MDAs and School Based Management Committee representative whose membership also includes parents and other stakeholders. The consultation was held virtually through online webex connection and phone in option due to the COVID19 restriction. MDAs that participated in the stakeholders engagement meeting included representatives of:

- Edo state Ministry of Environment
- Edo state Basic Education Board
- Edo state Ministry of Education
- The Edo state Innovation Hub
- Directorate of Establishment / Labor Relations
- Ministry of Physical Planning / Ministry of infrastructure
- Ministry of Labor
- Edo Skills development Agency
- Edo State Ministry of Justice / Task Force Against Human Trafficking/Illegal Migration and Sexual Exploitation
- School Based Management Committees (SBMC)
Discussion

During the consultation, the safeguards team confirmed the understanding of the safeguards approach, potential environmental and social risks and impacts and principles and steps to mitigating them to acceptable levels of the project with the client. In addition, the consultation provided the opportunity to clarify roles and responsibility of the Bank and the client including the implementing entity in managing the E & S risks that might result from the project and available remedies in the event of noncompliance were explained and validated with the client. This consultation also provided opportunity to hear from the recipient and other stakeholders on their understanding and concerns about the program.

Commitment of the client

The client and the implementing agency also agreed to implement the gap filling measures and activities enunciated in the Program Action Plan (PAP) and Environmental and Social Commitment Plan (ESCP). The client expressed satisfaction with the findings of the ESSA, took ownership and committed to implementing the actions and mitigation measures documented in the ESSA report through the relevant MDAs with support from the government.

The client also used the opportunity provided by the consultation to elaborate on new government programs aimed at closing the gender and disability gap in education through various online and other home-based IT enhanced educational platform to cater for the need of student under the current COVID situation. Based on the feedback received during the stakeholder’s consultation, the ESSA has been updated and would be subsequently disclosed on World Bank external website and in-country in Nigeria and Edo State MDA’s in particular in line with NCDC and state COVID-19 protocol.

Additional Documents and Support

During the consultation, the safeguards team also discussed and provided guidance to the government team on the finalization and completion of other additional documents as specified in the ESCP.

To assist the client in the preparation of these documents, samples were provided to the client with assurance of the Bank safeguards team support as needed.
Attendance:

<table>
<thead>
<tr>
<th>S/N</th>
<th>Name</th>
<th>Designation/Office</th>
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<tbody>
<tr>
<td>1</td>
<td>Mr. Joseph Eboigbe</td>
<td>Edo State Honorable Commissioner of Finance</td>
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<tr>
<td>2</td>
<td>Dr. Joan Oviawe</td>
<td>Executive Chairman, Edo State Universal Basic Education Board (SUBEB)</td>
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<tr>
<td>3</td>
<td>Mr. Osa Abbe</td>
<td>EDSG PforR Focal Person</td>
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<td>4</td>
<td>Hon. Jimoh Ijegbai</td>
<td>Commissioner of Education, Edo State</td>
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<td>5</td>
<td>Mrs. Ukinebo Dare</td>
<td>Head, Edo State Skills Development Agency</td>
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<tr>
<td>6</td>
<td>Omoua Oni-Okpaku</td>
<td>Honorable Commissioner, Environment</td>
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<tr>
<td>7</td>
<td>Prof. Yinka Omorogbe</td>
<td>Attorney-General/ Hon. Commissioner of Justice</td>
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<tr>
<td>8</td>
<td>Erimona Edorodion Oye</td>
<td>Honorable Commissioner, Physical Planning</td>
</tr>
<tr>
<td>9</td>
<td>Iyayi Omosaye</td>
<td>PS, Labor Relations (Directorate of Establishment)</td>
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<tr>
<td>10</td>
<td>SBMC Representative</td>
<td>SBMCs</td>
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