Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 08-Feb-2018 | Report No: PIDISDSA21631
### BASIC INFORMATION

#### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gambia, The</td>
<td>P162890</td>
<td>The Gambia - Education Sector Support Program</td>
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<thead>
<tr>
<th>Region</th>
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<th>Estimated Board Date</th>
<th>Practice Area (Lead)</th>
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<td>30-Mar-2018</td>
<td>Education</td>
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<thead>
<tr>
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<th>Borrower(s)</th>
<th>Implementing Agency</th>
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<tr>
<td>Investment Project Financing</td>
<td>The Ministry of Finance and Economic Affairs</td>
<td>The Ministry of Basic and Secondary Education (MoBSE), The Ministry of Higher Education, Research, Science and Technology</td>
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#### Proposed Development Objective(s)

To increase access to ECD and basic education and improve quality of teaching and learning.

#### Components

- **Component 1. Enhancing Access to ECD and Basic Education**
- **Component 2. Improving Quality of Teaching and Learning**
- **Component 3. Technical and Institutional Support**

#### Financing (in USD Million)

<table>
<thead>
<tr>
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<th>Amount</th>
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<td>EFA-FTI Education Program Development Fund</td>
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<tr>
<td>International Development Association (IDA)</td>
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<tr>
<td><strong>Total Project Cost</strong></td>
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#### Environmental Assessment Category

**B - Partial Assessment**

#### Decision

The review did authorize the preparation to continue
B. Introduction and Context

Country Context

1. The Gambia is a low-income country with an estimated population of about 2 million people (2015) and Gross National Income (GNI) per capita (Atlas method) of US$460 (2014). It is a small open economy that relies primarily on tourism, agriculture, and remittance inflows, and is vulnerable to external shocks, as illustrated by the 2014/15 Ebola virus disease crisis and the delayed rainy season, which led to a poor harvest in 2014. From 2010 through 2015, the real gross domestic product (GDP) growth averaged 3.1 percent. In 2016 and early 2017 the macroeconomic situation deteriorated, due to an over-valued exchange rate and a rapidly increasing government domestic debt burden, with total debt over 100 percent of GDP by end 2016, and foreign exchange resources exhausted. The uncertainty in early 2017 around the change of government, exacerbated these challenges. However, the new Government, led by President Barrow, has now adopted a revised 2017 budget, which seeks to begin the process of tackling fiscal imbalances. The World Bank Group has provided US$56 million through an emergency DPO to support this effort. The IMF has also agreed access under their Rapid Credit Facility, and other partners are expected to provide similar support. This support is expected to buy Government some breathing space to implement much needed reforms to provide a clear pathway to debt sustainability and macroeconomic balance.

2. The key long-term development challenges that The Gambia faces are related to its undiversified economy, small internal market, lack of skills necessary to build effective institutions, high population growth, lack of private sector job creation, and high rate of out-migration. Resilience to external shocks, such as volatile weather conditions and the effects of climate change, need to be strengthened through (a) diversification of the economy and an improved private sector investment climate; (b) effective civil service reform and improved public management capacity geared toward enhanced service delivery and conditions to support long-term growth and employment; and (c) improved transparency and accountability in public affairs and increased citizen participation.

3. Human development indicators remain low, but have progressed in the last 20 years. The Gambia ranks 173 out of 188 countries in the world in human development according to the United Nations’ Human Development Index (2015). However, between 1990 and 2015 The Gambia has made steady progress in key human development indicators. For example, life expectancy at birth increased by 8.4 years, mean years of schooling increased by 2.1 years, and expected years of school increased by 3.8 years.

4. However, in recent years, fiscal strains have mounted substantially because of fiscal slippages and poor performance of state-owned enterprises that have led to a significant buildup of public sector debt. The fiscal deficit averaged 11 percent as a share of GDP from 2013 through 2015, contributing to a rise in public sector debt to 108 percent of GDP in 2015 from 83.3 percent in 2013. Heavy reliance on costly domestic
markets has contributed to rising debt. Interest payments increased from 25 percent of revenues in 2013 to 40 percent in 2015 and are projected to reach nearly 50 percent in 2016. Contingent liabilities that reached five percent of GDP in 2014 are also a contributing factor.

**Sectoral and Institutional Context**

5. **The Ministry of Basic and Secondary Education (MoBSE) and the Ministry of Higher Education, Research, Science and Technology (MoHERST) manage the public education system.** MoBSE operations are partially decentralized across its six Regional Education Directorates (REDs), which facilitate operational and management issues at the regional levels, whereas financial management remains largely centralized. MoHERST, on the other hand, is centralized at all levels of education.

6. **The two Ministries together have developed the Education Sector Strategic Plan (ESSP) 2016-2030 which outlines the sectors' strategies, targets, and priority areas to ensure consistency across all levels of education.** The ESSP, which forms an integral part of the broader government *Vision 2020*, articulates the implementation and policy priorities for MoBSE and MoHERST, discusses sector-wide issues in education and training, and the linkages between the two ministries on cross cutting activities such as teacher training, and post-basic technical vocational education and training. The main policy focus areas are: (i) access and equity; (ii) quality and relevance; (iii) research and development; (iv) science, technology and innovation; and (v) sector management. The ESSP 2016-2030 is a revision of the ESSP 2014-2022 which marked a shift from programs based mainly on cycles of education to a more results-oriented program with emphasis on implementable interventions in priority areas. The ESSP 2014-2022 was revised to take into account the shifting financial realities in the country and to strategically inform the Vision 2020 under the new government leadership.

7. **The Gambia’s current formal education system follows a ECD-6-3-3-4 structure of ECD covering ages 3-6, six years of Lower Basic Education (LBE) which officially begins at age 7, followed by three years of Upper Basic Education (UBE).** Together, ECD, LBE, and UBE cover grades 0-9 and constitute the basic education level. This is followed by three years of Senior Secondary education and four years of tertiary or higher education. The Gambia has 934 conventional schools, two thirds of which are fully financed and managed by the government. An additional 10 percent are grant-aided schools which are typically former mission schools managed by school boards and financed by the government through a grant to the management body. The remaining 22 percent of private schools do not receive any government funding. In parallel there are 334 government recognized madrassas. These institutions provide the same curriculum as those of the public schools plus additional Islamic instruction and receive sub-grants from the government. Government and grant aided schools combined account for more than 70 percent of enrollment at each level. Private schools overall account for 10 percent of enrollment, but are more significant at SSS level, accounting for 19 percent of senior secondary enrollment. Madrassas, conversely, are more involved at the lower levels, and account for 19 percent of LBS enrollments.

8. **Government commitment to education in The Gambia has historically been strong, however total spending is comparatively low.** Despite the strong commitment to the sector, total spending on all levels of education represented only 3.2 percent of GDP, compared with the recommended level of 4-6 percent and the 4.5 percent SSA average. However, education spending as a share of total public spending stands at 20.4 percent which is in the recommended range of 17-25 percent depending on the country’s situation. Education
receives the highest share of the budget in the country but because the total public spending as a share of GDP is low (15 percent), education spending as a share of spending is also low. This is also one of the key reasons why the sector relies heavily on household and development partner contributions.

9. Despite fiscal challenges, the sector has benefitted from a consistent and proactive management team during the past several years. This has been critical in addressing the demographic and socio-economic challenges listed above. The government has made significant efforts to increase enrollment numbers in all levels of education despite the rapid population growth, and has been successful in reaching near full gender parity throughout basic education. They have made significant efforts to address quality challenges as well, and for example, have made strides in incentive schemes to even teacher qualification and deployment, introduced a model to integrate public school curriculum into madrassas, and piloted technology informed teaching approaches, among others. The general model has been to use analytic studies and pilot schemes to examine policy options and inform decisions on scale up of interventions and sustainability measures, including for example school grants which the government now fully manages. However, despite these considerable efforts, and some improvement over time\(^1\), the sector performance still faces numerous challenges, in terms of equity, access, and quality. The performance of the sector, and key challenges are outlined below.

**Progress has been made in Access and Equity, but a large number of out of school youth remain as do regional disparities.**

10. Enrollment has been increasing in The Gambia, however, the gross enrollment rate (GER) in UBS has remained stagnant. From 2010 to 2016 there was a 35 percent increase in LBS enrollment (from 228,2015 to 308,729) with a GER increasing from 88.3 percent in 2010 to 104.0 percent in 2016, and a 20 percent increase in UBS enrollment (from 75,635 to 90,838) with GER increasing from 66.2 percent in 2010 to 66.8 percent in 2016. As the enrollment has been increasing at the same pace as the population, the GER in UBS has stagnated. The primary completion rate (PCR) remained at 73.6 percent from 2010 to 2015 because of dropout rates coupled with population growth, although it increased to 75.4 percent in 2016.

11. Although universal primary completion has not been achieved significant progress has been made in reaching gender parity. The “traditional” gender disparities have been largely eliminated at lower levels and the gender parity rate is more than 100 percent at the preschool, primary and secondary levels of education. However, the post-secondary education level is still lagging at 69 percent in 2015. Girls register a higher GER and NER at both lower basic and secondary levels, while boys have slightly higher completion rates at those same levels.

12. The Gambia has been successful in introducing an ECD program which provides valuable early years education for children ages 3-6, and enrollment rates have improved considerably from 21 percent in 2006 to 46 percent in 2016. However, despite the increase in provision, challenges in ensuring equitable access to early education, and quality challenges remain. In region 2 for example, the enrollment rate is 56 percent,

\(^1\) E.g. gender parity has been achieved in all levels except higher education; learning outcomes have shown small improvements (according to NAT grade 5 assessments from 2012 to 2016 and the EGRA), and teacher deployment has vastly improved due to a revised incentive scheme.
while in region 5 the enrollment rate stands at 25 percent, further there are no minimum standards for ECD, and teacher training of ECD teachers is limited. An impact evaluation conducted in 2014, on the effectiveness of the two types of public ECD programs (community-based and annexed), showed positive impacts on learning outcomes using the annexed based approach, rather than the community based approach. This points to design and implementation shortcomings in the community based approach which the Government will redesign. Given the positive impacts of ECD on school readiness, and learning outcomes, the Government is committed to expanding quality ECD programs within the country, as part of the ESSP under Program Area 1. Equity and Access “ECD students adequately prepared for teaching and learning,” which aims to focus not only expanding and monitoring access, but also quality inputs such as training and minimum standards.

13. **There are regional disparities in access to education as illustrated by variations in the GER.** Region 2 has the highest GER in preschools (48 percent) and in upper basic schools (79 percent) while Region 5, a remote region with limited education infrastructure, registers the lowest GER in both pre-primary education level (15 percent) and primary education (53 percent). Region 6 also registers low enrollments particularly at the preprimary level (23 percent) and upper basic level (31 percent) (figure X). The government has been targeting interventions to mitigate socio-cultural and financial barriers that may impact enrollment and completion rates, yet the challenge persists and additional resources are needed to reduce regional inequalities.

14. **Although good data on special needs students is not available, support to these students is limited.** The Gambia has a twin track approach to provision of access for students with special needs. The students who need very special facilities go to special schools located in Banjul (there are three specialized schools: the school for the blind and visually impaired, the school for those with hearing difficulty, and the school for those with learning disabilities). As a matter of policy, students with more moderate special needs are accommodated in mainstream schools wherever possible, but specialized equipment (hearing aids, glasses, braille reading materials, lamps, wheelchairs) are rarely available, as is the provision of teacher training for adequate inclusion of special needs learners. As part of the ESSP, the Government has committed itself to inclusive education, and aims to enhance support to disabled students.

15. **The out-of-school incidence is high, at nearly 30 percent (IHS 2015), and disproportionally affects some regions (principally regions 5-6).** The availability of detailed analysis of equity in enrollment by district, which will allow for better targeting, shows that Region 5 not only has the highest incidence rate overall but also the 7 of the 10 districts with the lowest enrollment rates.

16. **Although the Government has instituted a fee-free policy by providing sub grants to schools, the cost of education remains a barrier for the poor.** The commitment of households to education has been increasing faster than public spending. On average, household spending on education as a share of their income increased from 1.5 percent in 2010 to 5.9 percent in 2015, where public spending as a share of GDP increased from 2.6 percent to 3.2 percent during the same time. Cost of schooling remains a significant burden for the

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2 Provision of some small equipment was provided under the Education for All-Fast Track Initiative Program approved in 2009, however a mechanism for identifying special needs learners year over year is absent.

3 The districts with the lowest enrollments in Region 5 include: Upper Saloum, Nianjia, Niamina East, Fulladu West, Sami, Niani, and Lower Saloum

4 The fee-free education policy was introduced in public Lower Basic Schools (LBS, grades 1-6), Upper Basic Schools (UBS, grades 7-9) and Senior Secondary Schools (SSS, grades 10-12) in 2013, 2014, and 2015 respectively. Initially it was financed through the Results for Education and Development (READ) project, but taken over solely by the Government as a sustainability measure.
poor, as out of pocket expenditures, e.g. uniforms, transportation, learning materials, reduce demand. For example, households from the poorest quintile spend about 98 percent of their income per capita on education, compared with 46 percent for the richest quintile, which implies that a child from the poorest quintile would go to school at the expense of his or her sibling and other family members. Development of a targeted cash transfer program could be effective in reducing the out-of-school incidence and encouraging on time enrollment.

17. The cultural and religious barriers to formal school are also difficult to overcome and the integration of religious schools remain a key challenge. There are 334 Madrassas that are recognized by the Government, as mentioned above: their certification and registration, following government curriculum with subsidized English teaching, has been important in attracting populations to the school system. The government also provides support to 17 majalis (Koranic schools), as part of the World Bank funded READ pilot program, through an annual conditional cash transfer (CCT) on the condition that they teach literacy and numeracy to enrolled children, most of whom would not receive any form of formal schooling otherwise. The grants are typically used to purchase rice, as a means toward stymying street begging, and have been found to have made some progress. An assessment was carried out in the Government in 2014 and another one is planned for 2017 to measure changes in numeracy and literacy outcomes over time using the EGRA/EMGA.

18. The Government has made tremendous efforts to reduce internal inefficiencies related to repetition but other key dimensions of internal efficiency related to delayed entry, survival and completion remain bottlenecks. For example, about 38 percent of children do not start school at the official school starting age (age 7), and the share of overage children in the last grade of primary reaches 72 percent. A broad range of evidence shows that children benefitting from quality early childhood development programs are more likely to enroll on time, and show higher levels of participation, achievement, and completion in education.\(^5\) As such expanded ECD access is a possible avenue towards much needed improvements in school readiness, access and completion.

Quality remains the most significant challenge.

19. Learning outcomes seem to be increasing, albeit slowly, and from a low base. The Early Grade Reading Assessment (EGRA) has been conducted on five occasions, in 2007, 2009, 2011, 2013, and 2016. The 2007 results revealed low scores and the Ministry of Basic and Secondary Education (MoBSE) has been conducting lower grade teacher training to improve literacy skills. More recent EGRA tests showed significant improvements in knowledge of letter sounds and word recognition, however reading comprehension is still low. The EGRA 2016 shows that on average in grade 1-3, students answered only one out of five reading comprehension questions correctly. The National Assessment Test (NAT) is conducted semi-annually in grades 3 and 5 and annually in grade 8. The scores, although low, are also showing slow improvements. For example, for grade five NAT scores improved from 47 in English in 2012 to 53 in 2016, and 43 in mathematics in 2012 to 49 in 2016.

20. A comprehensive curriculum update has not taken place recently, however modifications in the early grades have begun. In 2009, curriculum was audited and developed for non-core subjects for lower and

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upper basic schools, and on some core subjects for upper basic schools, and in 2014, The Gambia created a national early grade reading program called The Gambia Reads, building on experiences implementing various reading approaches, and the national languages strategy developed under the Education for All-Fast Track Initiative Project approved in 2009. It places a renewed emphasis on early grade reading and is a biliteracy program consisting of both national languages and English. The MoBSE with support from international linguists have been revising textbooks and developing leveled readers of all seven languages and English for grades 1-3. Subsequently revision of Teachers Guides and a Training Manual as well as training of trainers of national languages will be rolled out (September 2017). The full rollout of The Gambia Reads program should be supported, as should progressive curriculum review of ECD and Grades 1-9, given that the curriculum and textbooks, as well as teaching approaches, need updating. The aim would be to review curricula, establish clear learning goals and standards by subject, integrate best practice approaches in curricula by subject and grade level, and development of accompanying high quality learning materials.

21. **Teacher Recruitment and Deployment.** The number of teachers has grown rapidly in the last five years through sustained intervention from the Government to address shortages and increase enrollment of students – a critical step in expanding access. The increase has reduced the pupil to teacher ratio substantially, to 32:1 in basic education and 24:1 in secondary education, although there is some variation by region. Further, a combination of strategic stipends to teacher trainees, and hardship allowances to teachers who teach in designated hardship areas in regions 3-6 has equalized the deployment of qualified teachers throughout the country. Traditionally more remote regions have had higher PTRs and a lower proportion of qualified teachers, however, over the last decade, this situation has changed significantly. In regions 1-5 for example, over 95 percent of teachers are considered qualified (as measured by the government policy on teacher certification), with region 6 slightly lagging behind (91.4 percent of teachers are qualified).

22. **Although these incentives have been effective, some challenges remain.** In practice, the supply of teachers is not wholly based on demand and there is a disconnect between the supply of teacher trainees graduating from The Gambia College and the demand within the sector. In 2015 for example, the supply of teachers outpaced student enrollment. Further, the distribution of teachers and teacher trainees by region and level of education shows variation by region which suggests remaining challenges with deployment, even despite the increase in teachers. Some subjects are still difficult to recruit for, in particular, upper level mathematics and science, where qualified teachers are in shorter supply. This is a difficult challenge as a shortage of school leavers with mathematics and science skills means that those who do have many attractive options. Further the challenge is cyclical as the absence of a critical mass of quality mathematics teachers makes it difficult to raise standards in secondary schools, and to ensure future LBS teachers have sufficient understanding of mathematics and science. Similar deficiencies in competencies can sometimes be found in English teaching and impact foundational skills acquisition at all levels. This impacts quality as teachers who are not confident in their content knowledge may skip certain topics or provide incorrect information.

23. **Better strategic planning, including stronger linkages with The Gambia College, and a holistic approach to teacher training and management could help to both (i) optimize resource utilization and (ii) improve

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6 The Gambia has previously applied three different reading approaches, namely, Serholt Early Grade Reading Ability (SEGRA), Jolly Phonics, and a national language program.

7 Schools are considered hardship schools if they are more than 3km from the main road. There is also an additional “remote” hardship allowance for teachers in schools over 9km from a main road.
**Instructional practice.** An even more refined teacher recruitment and deployment policy could help optimize resource utilization, especially given that teacher salaries consume the largest share of the education sector budget. At the same time, while pre-service and in-service teacher training has improved over the years in the Gambia, including the introduction of promising pilot approaches which focus on interactive teaching methods\(^8\), the teacher education activities are often delinked and lack an overall strategic framework and coherent set of policies. At the Gambia College, as part of pre-service training, a new curriculum has been developed to improve teacher content knowledge which will be introduced in 2017. With its greater alignment of subject content with LBS and UBS curriculum and more opportunities for practice and feedback, the curriculum may well be impactful, however it would benefit from integration into a cohesive strategy which views pre-service and in-service teacher training along a continuum. For example, meaningful feedback on the performance of recently graduated teachers is not readily available to the Gambia College to adequately inform pre-service training improvement, while at the in-service level there is a limited offer of professional development opportunities, which are often ad-hoc. As such the new project, by building on the initiatives from earlier projects, aims to support development of a cohesive teacher training strategy and its implementation, with the overall aim of improving teacher effectiveness, and, ultimately, learning outcomes.

*Systems have been strengthened, but can be even further improved for data driven decision making.*

24. Support over time to the development of an education management information system (EMIS), has led to improvements in teacher and student management as well as better targeting mechanisms. However, additional updates are necessary to make the data more reliable by further developing the EMIS to link MoBSE and MoHERST which is not currently captured. Although learning assessments are carried out additional work is necessary to enhance the use of learning outcomes to inform school based and centrally based decisions. Better monitoring and dissemination of results could help counter this, as could continuous implementation of national and regional assessments. Further, The Gambia could benefit from benchmarking against other countries to assess performance of the sector.

### C. Proposed Development Objective(s)

Development Objective(s) (From PAD)
To increase access to ECD and basic education and improve quality of teaching and learning.

<table>
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<tr>
<th>Type</th>
<th>Objective</th>
<th>Indicator</th>
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\(^8\)An In-service teacher training program was reorganized, with the support of international consultants, to focus more on ensuring mastery of LBS and UBS content and on developing pedagogical skills based on lesson learned from implementation of an in-service training for teachers who did not have WASSCE credits in English and Mathematics, which proved challenging for teachers, and which was not focused enough on pedagogy. Since then, pre-and post-testing using the new training revealed that the large majority trainers have sufficient content knowledge and are currently being trained to deliver trainings on more interactive pedagogic methods. In parallel Gambia College, as part of pre-service training, has developed a new curriculum to improve teacher content knowledge which will be introduced in 2017.
PDO Indicator 1 (core) | Improve the quality of teaching and learning | Students benefitting from direct interventions to enhance learning
PDO Indicator 2 | Increase access to basic education | Increase in GER at LBS level
PDO Indicator 3 | Increase access to ECD | Increase in GER at ECD level
PDO Indicator 4 | Improve the quality of teaching and learning | Average score of the Reading Comprehension section of EGRA, Grade 3 in public schools

D. Project Description

Component 1. Enhancing Access to ECD and Basic Education - US$10.1 million (of which US$8.1 million IDA and US$2.0 million GPE)

Although access to education has improved in The Gambia as described above, out of school children remain, as do significant disparities amongst regions. Lack of public ECD provision, distance to school, poorly outfitted classrooms and financial challenges continue to be barriers for children. As such, Component 1 constitutes a selection of carefully chosen interventions, based on previous pilot approaches and priority areas, to increase access to early and basic education. The aim is to expand inclusive education for all, with an emphasis on geographic and economic disparities, gender, students with disabilities, and other vulnerable groups, through a blend of demand side and supply side interventions.

Access will be expanded through construction of new classrooms ECD and LBS classrooms, and continued provision of school transportation in selected communities, as well as through a targeted conditional cash transfer program in selected communities to incentive school attendance, scale up of the preexisting Koranic schools’ CCT program, and a second chance pilot program. A sensitization campaign to encourage school attendance will be carried out in parallel.

Component 2. Improving Quality of Teaching and Learning - US$19.0 million (of which US$16 million IDA and US$3.0 million GPE)

This component aims to improve the quality of teaching and learning through (i) sequenced revision of the curriculum for ECD through Grade 9; and (ii) the development of a coherent framework for teacher training and management to improve teacher effectiveness. The aim is to strengthen the curriculum with a particular focus on early grade reading and approaches to science and mathematics, while in parallel, developing a strategic teacher training and management policy as a means to improve classroom practices and ultimately learning outcomes.

Component 3. Technical and Institutional Support US$5.9 million (of which IDA US$5.9 million)

This component will (i) support capacity build for evidence based decision making in the sector through an enhanced system for monitoring of student outcomes, strengthening data systems, and a service delivery indicators data collection and analysis exercise, as well as support capacity building to improve data driven policy decisions. (ii) Implementation of a communication strategy; and (iii) project management and institutional support.
E. Implementation

Institutional and Implementation Arrangements

The proposed project will be implemented over a period of five years, however if the government can disburse in less than five years (given their previous positive implementation record), they can pursue additional IDA financing to the sector. As in previous projects, an inter-ministerial senior management team (SMT) will retain oversight of the sector and the project activities. This team comprises the Ministers from the MoBSE and MoHERST, the permanent secretaries, the deputy permanent secretaries, and the Project Coordination Unit (PCU) manager. Once a year, a representative from Ministry of Finance and Economic Affairs (MoFEA) will be invited by the SMT to discuss sector budget preparation and execution issues.

The majority of the members in SMT and PCU who implemented the Bank financed projects such as the Third Education Project Phase II (P077903, 2006-13), EFA-FTI Project (P115427, 2009-13), and READ Project (P133079, ongoing) have not changed the last decade, and represent an experienced, technically able group of representatives. The PCU in MoBSE will be responsible for project coordination and procurement, FM, contract management, donor coordination, and compliance with safeguards policies. The M&E unit in MoBSE will be responsible for all sector M&E activities including those related to the proposed project. The PCU is fully integrated into the MoBSE and the team is well versed in IDA procedures including procurement under the previous and on-going IDA programs as well as all other donor operations including AfDB, BADEA, IDB, among others. The PCU has been functioning in a satisfactory manner in previously financed Bank projects. With this experience, it is expected that the proposed project will greatly benefit from the arrangement of the MoBSE and PCU and will help in mitigating the residual risks that may exist, and is largely safeguarded from any impacts that result in changing of Ministers. In addition, the PCU comprises a qualified team including (i) a project manager and deputy project manager who coordinate the proposed project, (ii) a financial controller and two accountants, (iii) a construction unit comprising three engineers and six construction monitors and a (iv) procurement unit. Thus, the current functions would remain appropriate in the proposed project.

While the MoBSE will be the key implementation agency, the MoHERST will be consulted for all pre-service teacher training activities since Gambia College oversight falls under its mandate and will thus carry joint-responsibility. The Regional Educational Directorates (REDS) will be responsible for supervising all school related interventions via the head teachers and cluster monitors within their respective region. The directors in the MoBSE Headquarters will oversee all activities related to their mandates including in-service teacher training, planning, curriculum, monitoring and evaluation, early childhood development, standards and quality assurance. The WAEC, in partnership with SQAD and the Planning Directorate in the MoBSE, will continue to be responsible for assessment related activities.

The Project Implementation Manual (PIM) will be updated for this project and consist of the following: (i) Project administration and management including the structures of SMT and PCU, (ii) Procurement management including procedures for the procuring goods and works and the selection of consultants; (iii) Financial management including accounting system and procedures, funds flow mechanism, audit and financial statements and reports, (iv) detailed implementation arrangements and procedures of major activities, (v) Monitoring and evaluation procedures and arrangements for the project including M&E methods, roles and responsibilities, reporting and donor supervision.
**F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

Nationwide.

**G. Environmental and Social Safeguards Specialists on the Team**

Gernot Brodnig, Social Safeguards Specialist  
Ruma Tavorath, Environmental Safeguards Specialist

**SAFEGUARD POLICIES THAT MIGHT APPLY**

<table>
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<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
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<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>The policy is triggered due to the potential environmental impacts resulting from project activities, which include civil works and new constructions. These impacts and associate risks are expected to be minimal, site-specific and manageable to an acceptable level. Such issues include - sourcing of material from appropriate quarries; adequate siting of schools; waste management; proper water quality testing; sanitation facilities appropriately provided for students; Good quality products used (no asbestos or lead based paints); occupational health and safety during construction; community and children safety during construction; proper landscaping and design of buildings etc. An Environmental and Social Management Framework (ESMF) has been developed to ensure that site-specific mitigation measures are implemented, when the locations of the various schools and construction sites have been determined. The ESMF has been consulted and disclosed in-country and at the Bank InfoShop prior to the appraisal. The ESMF identifies standard methods and procedures, along with institutional arrangements for screening, review, approval and implementation and monitoring of specific ESMPs for schools construction subprojects, including the</td>
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The World Bank
The Gambia - Education Sector Support Program (P162890)

<table>
<thead>
<tr>
<th>Natural Habitats OP/BP 4.04</th>
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<th>Project activities will not have any impact on natural habitats</th>
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<td>Forests OP/BP 4.36</td>
<td>No</td>
<td>Project activities will not have any impact on designated forested land</td>
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<tr>
<td>Pest Management OP 4.09</td>
<td>No</td>
<td>Project activities will not necessitate the use or procurement of pesticides</td>
</tr>
<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>No</td>
<td>They could be a possibility that some sub-project sites may contain Physical Cultural Resources, like archaeological finds or heritage or religious properties. The ESMF includes procedures and process for managing chance finds.</td>
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<td>Indigenous Peoples OP/BP 4.10</td>
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<td>Involuntary Resettlement OP/BP 4.12</td>
<td>Yes</td>
<td>The project interventions will avoid where possible adverse impacts on people, land and other economic resources and livelihoods. In situations where this cannot be avoided, the Borrower has prepared and disclosed in-country and at the Bank InfoShop a Resettlement Policy Framework (RPF) to address the needs of persons who will be affected by loss of economic activities, access to resources, land acquisition and/or involuntary resettlement. In addition, where applicable, site-specific Resettlement Action Plans (RAPs) or Abbreviated Resettlement Action Plans (ARAPs) will be prepared and disclosed prior to school infrastructure construction.</td>
</tr>
<tr>
<td>Safety of Dams OP/BP 4.37</td>
<td>No</td>
<td>Project activities have no impact on dams</td>
</tr>
<tr>
<td>Projects on International Waterways OP/BP 7.50</td>
<td>No</td>
<td>Project activities are not associated with international waterways</td>
</tr>
<tr>
<td>Projects in Disputed Areas OP/BP 7.60</td>
<td>No</td>
<td>Project sub-sites are not in any disputed areas</td>
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KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The project is classified as Category B for Environmental Assessment (EA) purposes. It triggers OP 4.01 Environmental Assessment as some project activities include construction (classroom blocks, extensions, water points and toilets) and may result in small to moderate, site-specific negative impacts on the biophysical environment and the recipient
communities. While project activities are not expected to have significant direct impacts on the environment, proper mitigation measures must be put in place to help manage, reduce or eliminate the potential negative impacts. Since the exact locations of the intervention sites will not be known during project preparation, the borrower has prepared an Environmental and Social Management Framework (ESMF) which provides the standard procedure and institutional arrangements for environmental and social screening, categorization and approval of sub-projects as well as guidelines for the preparation, implementation and monitoring of the site specific environmental work (simplified ESIs/EMPs or environmental measures). These site-specific instruments include environmental clauses to be inserted in contractors’ bidding documents. The ESMF has been consulted upon and validated in-country and at the Bank.

The social impacts of the project, by the nature of its development objective are positive. The project design includes measures to ensure that barriers to school enrolment and attendance for disabled children are reduced, through a combination of physical measures and curriculum adaptations. In a similar vein, vulnerable households are incentivized through a CCT scheme to increase school attendance.

However, as school construction might entail land acquisition, the Involuntary Resettlement policy (OP 4.12) has been triggered and a RPF has been prepared outlining the policies and procedures to be applied in the event of relocation, or loss of asset/income sources/means of livelihood, as a result of project activities. Where these cases arise, site-specific Resettlement Action Plans (RAPs) or Abbreviated Resettlement Action Plans (ARAPs) will be prepared and disclosed prior to school construction.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
If left unattended, potential long-term negative impacts of school building construction could include soil erosion and loss of vegetation. In addition, if proper legal titles are not acquired by the MOBSE clearly indicating ownership of land that is assigned for schools prior to construction, community disputes around land ownership may arise.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
No large scale, significant and/or irreversible social and environmental impacts are expected to arise directly from project investments. However, the following recommendations have been made to the MOBSE/PCU to minimize adverse impacts during project implementation:
1. Assure full compliance with the safeguards instruments that govern the project - the ESMF and the RPF- and all sub-projects be screened and environmental and social management plans be prepared where needed.
2. Include social and environmental clauses in bidding documents
3. Designate an environmental and social focal point within the PCU who could coordinate the safeguards compliance (in line with the recommendations of the ESMF and RPF) during project implementation
4. Once appointed, strengthen the capacity of the social and environmental focal point in the PCU through training programs and bringing the focal point up to speed on monitoring and reporting mechanisms
5. Project environmental and social compliance monitoring be conducted in collaboration with The Gambia National Environmental Agency (NEA).
6. MOBSE should formally acquire and record all land that is assigned to the schools prior to construction. Fencing of school property before construction was also recommended.
7. Organize a workshop as part of the public disclosure of the safeguards instruments (ESMF and RPF) to inform all stakeholders of the safeguards instruments that govern the project, so they can also be informed and active participants in compliance monitoring during project implementation.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower
capacity to plan and implement the measures described. Capacity constraints to implementing the project safeguard requirements will be assessed and addressed in the context of the Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF). The project is set out to strengthen, as necessary, relevant stakeholders capacity to meet its safeguard requirements. In other words, the project shall implement any capacity strengthening measures that will be identified in environmental and social instruments applicable to this operation.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people. The key stakeholders include the local communities (urban and rural), ECD children, lower and upper basic and secondary students, lower basic and upper basic teachers, student teachers, school administrators, regional education offices, and the Department of State for Education (MOBSE, MOHERST). The two safeguards instruments governing the project, the ESMF and the RPF, includes institutional arrangements, and outlines the roles and responsibilities for the various stakeholder groups involved, for screening, reviewing, as well as implementation and monitoring of mitigation measures.

As soon as the implementation sites (sites of new school infrastructure construction) are identified, each project activity will systematically be processed through the environmental and social screening procedures as detailed in the ESMF. The screening will be conducted by the environmental and social safeguards focal point of the Project Coordination Unit (PCU)/MOBSE in collaboration with the NEA, and will include extensive consultations with the local stakeholders, with a focus on impact mitigation measures and processes.

B. Disclosure Requirements

<table>
<thead>
<tr>
<th>Environmental Assessment/Audit/Management Plan/Other</th>
<th>Date of receipt by the Bank</th>
<th>Date of submission for disclosure</th>
<th>Comments</th>
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<td>22-Jan-2018</td>
<td>05-Feb-2018</td>
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"In country" Disclosure
Gambia, The
05-Feb-2018

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<th>Resettlement Action Plan/Framework/Policy Process</th>
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<th>Date of submission for disclosure</th>
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<td></td>
<td>22-Jan-2018</td>
<td>29-Jan-2018</td>
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Comments

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

**OP/BP/GP 4.01 - Environment Assessment**

Does the project require a stand-alone EA (including EMP) report?
- Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?
- Yes

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?
- Yes

**OP/BP 4.12 - Involuntary Resettlement**

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?
- Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?
- Yes

**The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank for disclosure?
- Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?
- Yes
### All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
- Yes

Have costs related to safeguard policy measures been included in the project cost?
- Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
- Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
- Yes

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APPROVAL

Task Team Leader(s):  Ryoko Tomita

Approved By

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<th>Safeguards Advisor:</th>
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<tbody>
<tr>
<td>Practice Manager/Manager:</td>
<td>Meskerem Mulatu</td>
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<tr>
<td>Country Director:</td>
<td>Louise J. Cord</td>
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