



# Concept Environmental and Social Review Summary

## Concept Stage

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

Date Prepared/Updated: 04/29/2020 | Report No: ESRSC01348



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Gambia, The	AFRICA	P174035	
Project Name	Emergency Education COVID-19 Response		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing		5/15/2020
Borrower(s)	Implementing Agency(ies)		
The Gambia	Ministry of Basic and Secondary Education		

Proposed Development Objective(s)

The Project’s Development Objectives aim to: (a) support the dissemination and implementation of the education sector's COVID-19 strategic response plan; (b) ensure continued access to educational services via alternative forms of delivery; and (c) ready schools for reopening via accelerated learning programs and enhanced hygiene measures.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>4.95</b>

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

No

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

The project, financed with accelerated emergency COVID-19 response funds from Global Partnership for Education (GPE), is designed to implement The Gambia's Education Emergency Response Strategy (GEERS). The strategy aims to ensure continuity of learning and distribute critical messages on health and educational messages to all communities; and to build resilience into the educational system for a safe return to schools. This continued engagement with children and families is critical to avoid long-term downturns in school enrollment and learning outcomes, and to distribute critical messages to children and families. The project will consist of four components: (i) Continuity of



Learning; (ii) Safe Return to School; (iii) Community Engagement and Communications; and, (iv) Project Management and Evaluation.

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

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]  
This Emergency Education Coronavirus Response Project (P174035) is focused on intervention strategies in the education sector in the context of COVID-19; it is also aligned with World Bank support for the National Response Plan under the leadership of the Ministry of Health through three key preparatory actions, namely: (i) Ensuring that children and their families have access to relevant and timely information on COVID-19 to protect themselves from infection and reduce the transmission rate within communities; (ii) enhancing a speedy recovery for the education sector from the impact of COVID-19 and for improving the resilience of the sector; and, (iii) ensuring continuity of learning on a minimal delivery of curriculum during the initial 21-day school closure and then progressively expand curriculum coverage, using multiple curriculum delivery platforms in the medium- to long-term. The strategy was endorsed by the Local Education Group (LEG) on March 24, 2020.

The project will be carried out across the six regions of the country and activities will focus on assisting families and students on the continuity of education during this period of the health crisis, the implementation of a strategy to resume school activities after the crisis, and community involvement. The project will also ensure the distribution of essential food items to the most vulnerable families. The project will rely on local radio, television, school management committees, staff of the regional education directorate (RED), teachers, educational staff and the internet to disseminate clear and precise information.

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

The project will be implemented by the Project Coordination Unit (PCU) of the Ministry of Basic and Secondary Education (MoBSE), which manages the current education sector support program (GESSE-P162890) that has been in force since August 2018. Although the PCU has substantial experience working on World Bank Group operations, and given the unprecedented nature of the COVID-19 pandemic there is limited experience developing and implementing educational activities and safety measures aligned with the physical distancing measures. Mitigation measures include building on preexisting technology platforms and data collection experience, using best practice examples from reopening schools following the Ebola crisis as well as cross-sectoral coordination with the Ministry of Health and continued support from local education partners. In addition, as this PIU has no previous experience with the World Bank's Environmental and Social Framework (ESF) and does not have the adequate environmental and social specialists in place, institutional capacity is considered weak.

The capacity of the MoBSE to manage the environmental and social (E&S) risks will be built through ongoing support and training by World Bank officers and by environmental and social specialists. In addition, the PCU must prioritize hiring a full time environmental and a social specialist and in the interim, enlist either a very experienced local environmental and social specialist or an international specialist to support capacity enhancement of E & S staff and provide ongoing support in the interim.

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

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

Moderate



### Environmental Risk Rating

Moderate

The environmental risks are considered moderate. Although the main activities of the project will have positive impacts on remote areas, several environmental, health, and safety risks are to be taken into account during the implementation of certain activities, such as those relating to subcomponent 2.1 (Healthy Schools). These activities will require that special attention and procedures are in place to ensure schools are ready to safely receive students again. This includes implementing all necessary provisions to minimize the risk of infection or contamination with pathogens.

### Social Risk Rating

Moderate

The project's activities aim to contribute to enhancing social inclusion, and the accessibility and continuity of education during COVID, especially for vulnerable learners, such as those in remote regions, food insecure students and families, those who do not have access to platforms and tools to access distance learning (including digital access or reliable electricity), learners with disabilities, girls, and others. However, there are moderate-level social risks to be addressed. Key risks include: Violence against children (VAC)/Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH); ensuring activities such as the provision of food, equipment, and other learning materials, and other forms of support to reach students; and ensuring communication is tailored to specific constituencies to address linguistic differences, take into account literacy, access to mass communication, culturally and age-appropriate messaging, and others.

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

### B.1. General Assessment

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

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

The project could also cause a number of environmental, health, and safety risks from the use of chemicals to thoroughly clean and disinfect schools. The treatment and monitoring of water quality at school level is also a significant aspect to take into account. To avoid or mitigate these risks related to the project, the MoBSE will prepare an Environmental and Social Management Plan (ESMP) to provide adequate measures to be implemented during operations. These will include provisions relating to the use of products that will be used for the deep cleaning and disinfection of schools and their storage and use by qualified personnel to avoid any risk of damage to human health. The ESMP will also cover treatment of water from existing water sources and will include all procedures to be followed for quality improvement, with regular monitoring to ensure the potability of the water is perennial. World Health Organization (WHO) guidelines may be used as a reference for carrying out this activity.

In addition, to mitigate social risks, the ESMP will include a GBV/VAC/SEA/SH assessment and plan and a Grievance Mechanism (GM) accessible to vulnerable groups, such as women, children, the elderly, and persons with disabilities, with effective, accessible, and inclusive communication measures about its existence and use. The GM will also be included in the Stakeholder Engagement Plan (SEP), and will be set up for receiving grievances, and providing support



to SEA/SH survivors, and that it is universally accessible and will consider the required social distancing measures, so that students (including/especially those with disabilities) who are living in quarantine situations still have some appropriate means to access them. Further the ESMP will identify measures to ensure the provision of technological equipment (TV/radios, braille readers, books, writing materials, etc.) as well as food support reach those in need and the most vulnerable with equitable access to girl/boy children, learners with disabilities and other vulnerable households/children so that support is targeted and monitored. The ESMP will be prepared and disclosed within 30 days of effectiveness.

An Environmental and Social Commitment Plan (ESCP) agreed upon with the Bank will also be prepared by the Borrower. The ESMP will set out the substantive measures and actions that will be have to be taken by the Borrower to meet environmental and social requirements.

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

Borrower's framework will not be used

**ESS10 Stakeholder Engagement and Information Disclosure**

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. In consultation with the Bank, the client will prepare and implement an inclusive SEP. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to it. It will ensure the appropriate representation and participation of various groups of stakeholders, including women, children, persons with disabilities, linguistic minorities, the elderly and other vulnerable groups. Particular efforts will be made to reach parents and families in remote communities, as well as religious leaders and community leaders, in order to inform a plan to transmit messages on healthy conflict resolution, healthy parenting, stress and anger management, and family and community support to children accessing distant learning. In the context of infectious diseases, broad, culturally appropriate, and adapted awareness raising activities are particularly important to sensitize communities to the risks related to infectious diseases.

The Borrower will engage in meaningful consultations on policies, procedures, processes and practices (including grievances) with all stakeholders throughout the project life cycle, and provide them with timely, relevant, understandable and accessible information. A project-wide Grievance Mechanism (GM), proportionate to the potential risks and impacts of the project, will be established. This will include a GM that is accessible and that students (including those with disabilities) living in quarantine situations have appropriate means to access. The SEP will include measures to ensure effective and appropriate communication about the presence of the GM, especially to children and other vulnerable groups, in accessible formats and appropriate languages. The SEP will be in line with the guidance provided by the Bank related to public consultation note for projects under COVID. A draft of the SEP will be prepared and disclosed as early as possible, prior to approval of the project.



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

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

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

Project activities will be carried out mainly by school management committees, staff of the country's Regional Directorate of Education (RED), teachers and other educational staff, the majority of whom are government civil servants who fall under the provisions for workers safety outlined in ESS2.

The individuals making up the staff responsible for ensuring the thorough cleaning and disinfection of schools need to be protected; they may fall under a provider who will work as part of the project. The main risk is possible exposure to chemical products that could lead to skin irritations or other conditions if individual members of the cleaning staff are not qualified for this type of cleaning or do not have adequate Personal Protective Equipment (PPE). The project will ensure the application of the Occupational Health and Safety (OHS) measures to be described in the ESMP to mitigate these risks. This includes raising staff awareness, making available safety data sheets for the products used, providing suitable PPE, and respecting procedures for carrying out tasks.

The project will call on specialized service providers to ensure the improvement and monitoring of water quality, and ESS2 will apply to these workers. The MoBSE-PCU will need to develop procedures that respond to the specific health and safety issues posed by project activities and protect workers' rights as set out in the ESS2. This shall include Labor Management Procedures (LMP), included in the ESMP, to establish a procedure for the protection of workers' rights. The use of child labor will be forbidden in accordance with ESS2. No large-scale labor influx is expected as part of this project. In line with ESS2, the use of forced or conscripted labor in the project is prohibited. The project will also ensure a basic and responsive grievance mechanism to allow workers to quickly inform management of labor issues, such as the lack of PPE or unreasonable amounts of overtime.

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

**Waste management:** Certain activities in sub-component 2.1 (the cleaning and disinfection of schools) could generate the production of waste (product containers, contaminated materials, ordinary waste, etc.), but the impact is not expected to be significant on environment and human health. The ESMP will assess risks associated with waste likely to be generated by the project and if such waste cannot be avoid, appropriate mitigation measures will be proposed.

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



The project will put in measures to address avoid any form of Sexual Exploitation and Abuse/Harassment (SEA/SH) risks for all workers. The project/PIU staff must also sign Codes of Conduct with clear and unambiguous language as to what constitutes SEA/SH, its prohibition, and the sanctions for breaching this conduct.

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

Not relevant as no physical or economic displacement is expected in this project.

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

Not relevant. However all personnel involved in the project must following the requirements delineated in the ESMP to ensure the safe handling of waste.

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

There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.

**ESS8 Cultural Heritage**

This standard is not relevant according to the activities planned under the project

**ESS9 Financial Intermediaries**

This standard does not apply.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

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

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

**Financing Partners**

Not applicable

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

Public Disclosure



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

Actions to be completed prior to Bank Board Approval:

- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP)
- Preparation of the GRM
- ESCP

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

- Implementation of SEP and GRM
- Implementation of the LMP
- Preparation and implementation of the ESMP (with social baseline of vulnerable groups in the project area)
- SEA/SH/VAC risk assessment/monitoring in the ESMP, set up of GRM to address SEA/SH/VAC, mapping of services and communication plan to sensitize children and other vulnerable groups about its use and presence
- Strengthen institutional capacity: The PIU must have one Environmental and one Social Risk Mitigation Specialist. The current PIU does not yet have full E&S staff although hiring is underway. This measure must be met within 30 days of effectiveness. Training of the PIU E&S specialists could be supported by the current part-time E&S consultant with Bank support of E&S specialists.

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

08-May-2020

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: The Gambia

**Implementing Agency(ies)**

Implementing Agency: Ministry of Basic and Secondary Education

**V. FOR MORE INFORMATION CONTACT**

Public Disclosure





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## VI. APPROVAL

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Practice Manager (ENR/Social)	Aly Rahim Recommended on 29-Apr-2020 at 09:34:11 EDT