



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 07/23/2020 | Report No: ESRSA00981



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Benin	AFRICA WEST	P174186	
Project Name	Benin COVID-19 Education Response GPE Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	7/8/2020	8/26/2020
Borrower(s)	Implementing Agency(ies)		
Ministry of Economy and Finance	Ministry of Pre and Primary Schools		

Proposed Development Objective

The proposed project's development objectives are to: (a) ensure continuity of teaching during and after the COVID - 19 pandemic, particularly in deprived communes in the Recipient's territory; and (b) increase the Government's preparedness to mitigate the effects of future crises

Financing (in USD Million)	Amount
Total Project Cost	6.85

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

Yes

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

The project will support through:

- a- Component 1:
 - (i) community mobilization activities;
 - (ii) provision of water, sanitation and hygiene (WASH) to ensure schools have appropriate hygienic measures in place for students and teachers;
 - (iii) provision of grants to schools in deprived communes to encourage disadvantaged students to return; and (iv) remedial programs for students at risk of repetition and drop-out in deprived communes.



b- Component 2: (i) Expanding sustainable remote learning opportunities; and (ii) Building capacity to mitigate the effects of the crisis and anticipate future shocks in the education sector
Finally, Component 3 aims to ensure the effective implementation of the daily operations of the project and to build knowledge and competencies to improve services delivery

D. Environmental and Social Overview

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

The Project will be implemented throughout the country. Project activities will focus on: (i) ensuring learning continuity by supporting remote learning and by tracking of student progress and teacher training in distance learning, content design, and pedagogy; and by supporting, community sensitization programs for effective learning continuity, and for disease control and prevention (through parent and community engagement to support home-based schooling, gender sensitization campaigns, and media campaigns); (ii) supporting the safe re-opening of schools and student re-entry in schools by establishing a gradual, staggered school reopening process, ensuring safe and healthy school environments, deploying back-to-school media campaigns, providing financial incentives, such as small grants to support vulnerable householders and to ensure children go back-to-school quickly, providing psychological support for students and school staff, as well as catch-up programs for students at risk; (iii) strengthening system resilience to anticipate future education shocks by establishing contingency plans, making a case for greater resource allocations and learning lessons from COVID-19 crisis.

The project will rely on radio, television, school management committees, teachers, other educational staff, and the internet to disseminate clear and precise information.

D. 2. Borrower's Institutional Capacity

The Government of Benin has an acceptable legal and regulatory environmental and social framework, with a national Environment agency (Agence Beninoise de l'Environnement, ABE) that oversees the approvals of environmental and social studies and the monitoring and evaluation of such studies. This agency is not well staffed, but its capacities for social risk management are considered acceptable by the World Bank.

Although the Ministry of Education has substantial experience of World Bank operations, mainly on its safeguards policies, it has no previous experience with the World Bank's current Environmental and Social Framework (ESF). Given that fact, the Environmental and Social Commitment Plan (ESCP) of the project should include capacity building activities, as well as targeted mitigation measures based on existing technology platforms and examples of best practice from the reopening of schools following a health crisis. The PCU must prioritize hiring an environmental specialist and a social specialist full time to properly manage the environmental and social (E&S) impacts and risks associated with this new operation.

The project will use the institutional arrangements of the Benin GPE Project-Phase 3 (P167432), which is a low risk category C project.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate



Environmental Risk Rating

Low

The project aims to minimize the adverse effects COVID-19 has on students, teachers, and the education system. It will support community sensitization, the procurement of hand washing materials (as a measure for preventing the spread of the highly infectious COVID-19 disease), and the establishment of a referral system for case management. In addition, it will support: the tracking of student progress; the design of remote learning content and teacher training in distance learning, content design, and pedagogy; and the delivery of a set of interrelated activities aimed at sensitizing communities to effective learning continuity and the control and prevention of disease. More importantly, this new operation will be essential for the completion of the ongoing school year as it aims to track student progress by conducting simple learning assessments to ensure that all students are learning and anticipate the risks of learning loss or students dropping out. The project will not finance activities related to cleaning and disinfection of schools, construction or rehabilitation. The environmental, health and safety concerns arising from the proposed activities are mainly two: (i) continued risk of disease transmission; and (ii) management of solid waste from safety equipments to be procured for teachers, as well as potential electronic waste from ICT related equipment. The potential adverse impacts and risks are likely to be minimal and can be managed through known measures

Social Risk Rating

Moderate

The social risks associated with the project's expected activities are considered moderate. The proposed activities will have positive social outcomes. There will be no construction or rehabilitation activities. The main social risks of the project are: (i) the potential exclusion of learners from the lowest income bracket of families and of poor families living in very remote areas who may not have access to the internet, television, and radio that are fast being adopted as mediums of learning during the COVID- 19 lockdowns; (ii) learners in these settings are also more likely to face violence and abuse arising from parents who may, for example, expect children to provide more labor to contribute to the family's economic resources as the children stay at home; (iii) the closure of schools from March 30 to May 11, 2020, could negatively affect the progress of the education curriculum and result in anxiety and uncertainty in continuity for students in school as well as for teachers; (iv) some children may drop out of school, due to the economic impact of COVID -19 on low earning households; (v) the role of teachers may also be threatened by alternative learning methods provided by the project, which could lead to anxiety and mental stress both for teachers and students.

As the project plans to provide learning materials to students as well as delivering learning programs through the media and any other practical channels available, the competition to access these resources could lead to mild tension within local communities. Therefore, the Borrower's Environmental and Social Commitment Plan (ESCP) must include a communications strategy; this should be mainly oriented towards parents asking them to allow children access to study materials availed by the project and the study time at home. There should also be mitigation measures to ensure the most culturally appropriate and convenient way to provide learning materials and to support learners to address the risk of violence against children (VAC), as well as exposure to sexual exploitation, abuse, and sexual harassment (SEA/SH). The project should develop and set up a participatory citizen engagement strategy around its objectives within its Stakeholder Engagement plan. Psycho-social support for teacher, parents and learners during the lockdown and the transition to the reopening of schools should be done through sensitization activities that include stakeholders' views and concerns.

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:

Assessment of the investments planned under this new operation do not anticipate particular risks or impacts that could harm student or the environment. There are no physical or civil works. The large majority of the activities planned are capacity building activities anticipated to have a positive impact on the education system in Benin. However, for activities such as procurement of masks for teachers and school administrators, which require that procedures are in place to ensure safe disposal to avoid contamination. In addition, although during the project implementation generation of e-waste is not expected, the project will ensure sustainable handover and ownership of the equipment procured under the project. To avoid or mitigate risks related to the project, the Borrower will prepare a basic Environmental and Social Management Plan (ESMP) to provide adequate measures to be implemented during operations. The ESMP will also cover treatment of water from existing water sources, with regular monitoring to ensure the potability of the water is perennial, and waste management related to printing books. World Health Organization (WHO) guidelines should be used as a reference for carrying out these activities, especially those related to disposal of masks and to hand-washing. Furthermore, to mitigate social risks, the ESMP will include a VAC/SEA/SH plan, with a Grievance Mechanism (GM) embedded in it and made accessible to vulnerable groups, such as young girls and students with disabilities. The VAC/SEA/SH plan will include effective, accessible, and inclusive communication measures about its existence and use. The Stakeholder Engagement Plan (SEP) will also include a Grievance Mechanism (GM) that will also address grievances and providing support to SEA/SH survivors. The GM will be accessible and inclusive, and take social distancing measures into consideration, so that students from vulnerable groups (such as girls, students with disabilities, those from the lowest income families and from poor families living in very remote areas) may have means to access them. The ESMP will identify measures to ensure the provision of materials for students, including 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 Borrower will prepare an Environmental and Social Commitment Plan (ESCP), agreed upon with the Bank. The ESCP will set out substantive measures and actions within an effective calendar, with responsible authorities.

ESS10 Stakeholder Engagement and Information Disclosure

In consultation with the Bank, the Borrower will prepare and disclose an inclusive SEP that outlines the main characteristics and interests of relevant stakeholder groups, as well as the timing and methods of engagement with them throughout the project life-cycle and an outline for the establishment of a project GM. The GM will be accessible to students, teachers, inspectors, pedagogical advisers, student parents and other communities (including those with disabilities) living in lockdown situations. The SEP will include measures to ensure effective and appropriate communication about the existence of the GM, conveying it especially to students, teachers, parents and vulnerable groups in accessible formats and appropriate languages. After project approval, and prior to the works commence on the ground, the SEP will be updated to include more detailed information regarding methodologies for information sharing and for more robust stakeholder mapping and the identification of existing community-based platforms that can be used to facilitate effective community engagement and participation, as well as detailing the monitoring and evaluation plan. 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.



The SEP will be in line with guidance provided by the Bank related to public consultation note for projects initiated under COVID19. A draft of the SEP will be prepared and disclosed as early as possible, prior to the 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 PCU team, school management committees, 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 project could use various services providers. It will ensure the application of the Occupational Health and Safety (OHS) measures to be described in the ESMP. This includes: raising staff awareness, making available safety data sheets for any product used; providing suitable PPE; and respecting the proper procedures for carrying out tasks, in compliance with ESS2. The PCU will need to develop and implement procedures that respond to the specific health and safety issues posed by project activities and to protect workers' rights as set out in the ESS2. This shall include Labor Management Procedures (LMP) included in the ESMP to establish procedures for the protection of workers' rights. And it will provide guidance regarding the policies and procedures that will govern the treatment of teachers, students, project staff and other workers hired under the project, including the management of OHS and SEA/SH risks. No large-scale labor influx is expected as part of this project. Per the requirements of ESS2, employing children and using forced labor or conscripted labor in this project are prohibited. The project will be required to meet the standard requirements for employees and their employees' working terms and conditions, including maintaining equality of opportunity and a right to workers' associations. The project will ensure a basic and responsive grievance mechanism to allow workers to inform management of labor issues quickly.

ESS3 Resource Efficiency and Pollution Prevention and Management

The waste that will be generated from project activities can be safely disposed by applying known measures. The ESMP will include measures to avoid waste production, and where avoidance is not possible, the ESMP will provide measures for safely disposal. Regarding ICT to be procured, it's not expected to be replaced during the project life time. However handover of ICT equipment will include agreements on proper disposal of electronic equipment beyond the life of the project. In terms of efficiency, the project will ensure that the equipment it procures is energy efficient to the extent possible.

ESS4 Community Health and Safety

The project will put in place measures to address any form of Violence Against Children (VAC), as well as any risk of SEA/SH from workers towards local communities' members, such as children and parents. The PCU staff, as well as other workers involved in the project, must sign Codes of Conduct expressed in clear and unambiguous language as to what constitutes SEA/SH, as well as explaining its prohibition and the sanctions imposed for breaching conduct.

Public Disclosure



ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The ESS is not relevant as no physical or economic displacement is expected in this project.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The ESS is not relevant. However all personnel involved in the project must following the requirements delineated in the ESMF 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 is not relevant for this operation.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

The project does impact neither waterways nor their tributaries.

OP 7.60 Projects in Disputed Areas

No

The project is not located in Disputed Area.

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
An ESMP with a social baseline of vulnerable groups, including the SEA/SH risk assessment/monitoring with a GRM to address risks, the mapping of services, and a communication plan to sensitize students and their parents will be prepared and implemented throughout the project life cycle.	08/2020
The ESCP will be prepared and disclosed within the country prior to approval. The activities included will be implemented during the project life cycle	06/2020

Public Disclosure



An Environment Specialist and a social specialist will be hired prior to the civil works commence on the ground and maintained throughout Project implementation.	07/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
The preparation, consultation, and disclosure of the SEP, including the GRM, should be done prior to board approval. It will be updated prior to the civil works commence on the ground to include further details and arrangements for implementation.	08/2020
ESS 2 Labor and Working Conditions	
The Labor Management Plan (LMP) to be included in the ESMP will be prepared prior to the civil works commence on the ground.	08/2020
ESS 3 Resource Efficiency and Pollution Prevention and Management	
Considered under the ESMP.	08/2020
ESS 4 Community Health and Safety	
Considered under the ESMP and SEP	08/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
Not Applicable.	
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
Not Applicable.	
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
Not Applicable.	
ESS 8 Cultural Heritage	
Not Applicable.	
ESS 9 Financial Intermediaries	
Not Applicable.	

Public Disclosure

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

No

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

N/A



IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Economy and Finance

Implementing Agency(ies)

Implementing Agency: Ministry of Pre and Primary Schools

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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