

Republic of The Gambia



Ministry of Basic and Secondary Education

Updated Environmental and Social Management Framework (ESMF)

The Gambia Education Sector Support Project (GEESP) and Additional Financing

Original date of ESMP- January 2018

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List of Acronyms

AIDS	Acquired Immune Deficiency Syndrome
BDO	Biochemical Oxygen Demand
COD	Chemical Oxygen Demand
COVID-19	Coronavirus Disease 2019
ESA	Environmental and Social Assessment
ECD	Early Childhood Development
ESFP	Environment and Social Focal Point
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESSC	Environmental and Social Screening Checklist
ESMF	Environmental and Social Management Framework
ESSF	Environmental and Social Screening Form
FIOH	Future In Our Hands Freedom In Our Hands
GBV	Gender-Based Violence
GEAP	Gambia Environment Action Plan
GEOSP	Gambia Education Sector Support Project
GPE	Global Partnership for Education
GRC	Grievance Redress Committee
HIV	Human Immunodeficiency Virus
ICT	Information Communication Technology
IDA	International Development Association
LACA	Land Acquisition and Compensation Act
LBS	Lower Basic School
MoBSE	Ministry of Basic and Secondary Education
MOHERST	Ministry of Higher Education, Research, Science and Technology
NCAC	National Centre for Arts and Culture
NEA	National Environment Agency
NEMA	National Environment Management Act
NEMAC	National Environmental Management Council
NEMP	National Environmental Management Programme
NGO	Non-GovernmentGovernmental Organization
OP	Operational Policy
PAP	Project Affected Persons
PCR	Physical Cultural Resources
PCU	Projects Coordination Unit (Min. of Basic and Secondary Education)
RAP	Resettlement Action Plan
RCM	Regional Construction Monitors
READ	Results for Education Achievement and Development Project
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SSS	Senior Secondary School
TAC	Technical Advisory Committee
TANGO	The Association of Non-Governmental Organizations

TOR	Terms of Reference
UBS	Upper Basic School
VAC	Violence Against Children
VDC	Village Development Committee
VLD	Voluntary Land Donation
WB	World Bank

EXECUTIVE SUMMARY

The Government of The Gambia in collaboration with The World Bank developed a project to support the Gambia Education Sector Support Project (GESSP), which was approved in 2018 and serves as successor to the Results for Education Achievement and Development Project (READ). This project consolidates the achievements made thus far in the sector by placing emphasis on educational access and improvement of quality of teaching and learning. Following an initial two years of implementation, with support from the Global Partnership for Education (GPE) and with the World Bank as the grant agent, the GESSP will receive additional financing which is an opportunity to scale up and expand upon the activities included in the original financing.

The objective of the proposed project to increase access to Early Childhood Development (ECD) and basic education and improve the quality of teaching and learning will remain the same, and the project remains comprised of three main components: i) Enhancing Access to ECD and Basic Education; ii) Improving Quality of Teaching and Learning; and iii) Technical and Institutional Support.

According to the World Bank project classification the GESSP is a Category B project with respect to potential environmental and social impacts which means the potential negative environmental and social impacts have known mitigation measures which can be effective. To ensure that the potential negative impacts are addressed, this Environmental and Social Management Framework (ESMF) has been prepared which provides an environmental and social screening process for investments of the project which have environmental and social risks, including but not limited to infrastructure investments, curriculum updates, and teacher training. For the implementation of the works, the Project has also prepared a Contractor Environmental and Social Management Plan (C-ESMP) to help mitigate the potential impacts which can occur during the works.

An ESMF was prepared because at the time of project preparation under the parent project, the scope, scale, locations and number of sub-projects had not been fully defined so was not possible to fully determine what the environmental and social impacts are. This ESMF has been revised in October 2020 to include the new project activities that are being financed under the additional financing and update the developments in monitoring and implementation arrangements, as well as enhanced E & S capacity of the PCU.

1. UPDATES TO THE ESMF

a) Environmental and Social Risks Screening

The screening of the infrastructure investment has been done at the regional level by the Construction Monitors supported by the Environmental and Social Safeguards consultants of the PCU and the Regional Environment Programme Officers, with the participation of the affected communities. The GESSP has hired an international environmental and social consultant who assisted the Regional Construction Monitors in the screening of the sites and verify the voluntary land donation from the communities for the schools' sites (see Annex 1 for the checklist).

The screening checklist was done in all sites, accompanied by consultation of affected communities to ascertain voluntary land donation process and land transfer, and determine the type of negative environmental and social impacts and risks the Project may have on those identified communities.

The outcome of the screening is as follows:

- (a) No major environmental and social impacts and risks were identified to justify an ESIA or RAP
- (b) The implementation of simple mitigation measures will suffice; or

- (c) A Contractor Environmental and Social Management Plan (C-ESMP) has been prepared in order to guide the Contractor for the implementation of the civil works in an environmentally and socially sustainable way.

The completed forms of the checklists have been shared with the World Bank environmental and social safeguards team for their review and no-objection. It was clear there is no need to prepare an ESIA or RAP. A C-ESMP was prepared by the Contractor in accordance with the national environmental legislation and the World Bank Operational Policy 4.01. It was approved by the Projects Coordination Unit of MoBSE and includes a Grievance Mechanism (GM) at the project level, with procedures to handle Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints ethically and confidentially, including a response protocol to facilitate service referrals for medical, psychosocial, and legal support.

b) Possible Environmental and Social Risks and Impacts

Possible environmental and social (E&S) impacts of the project will result mainly from the construction works and the related services such as the loss of agricultural lands following voluntary land donation from communities, interruption of natural waterways or drainage systems, generation of all manner of solid and liquid wastes, the noise and dust during civil works, the need of water from the village wells. Other social risks include Violence Against Children (VAC), SEA/SH from workers coming from outside the communities, disruption of community life and cohesion resulting in community hostility and lack of support for the project, discrimination in the recruitment of workers and also teachers including their deployment, access to built schools and education for vulnerable groups, risks of non payment for services rendered by the community to the contractor, risks of child labor when children below the minimum age for employment are used as temporary replacements for workers recruited from the community. These risks and impacts are addressed in the mitigation table in the Environmental and Social Management Plan chapter.

These environmental and social impacts occur prior to, during and after construction of the main educational infrastructure as well as other activities related to teacher training, curriculum reforms, and the introduction of an induction program for student-teachers and newly qualified teachers.

In terms of infrastructure, the main E & S risks and impacts prior to construction are:

- Loss of vegetation, soil erosion, interruption of natural waterways or drainage systems or the destruction of natural habitats for various fauna, and destruction of protected sites prior to construction.
- The generation of all manner of solid and liquid wastes, increased dust and noise pollution during construction and notably the use of toxic and other hazardous materials,
- Failure to restore the sites to, at least, their previous condition in respect to vegetation cover, protection by fences from unwanted encroachment and construction debris.
- Potential risks to community health and safety from labor influx as well as other non-construction related activities that are included in the additional financing, including risks related to gender-based violence (GBV), which encompasses SEA/SH.
- Potential risks related to work accidents or occupational diseases with the workers who will be recruited including the transmission of COVID-19 as this project is taking place during the global pandemic.

c) Land acquisition

This project is acquiring land through voluntary land donation using the following principles:

- Land is given freely without any coercion

- It accounts for 10 percent or less of the landowner's land holding and does not adversely impact livelihoods
- The landowner is aware that no compensation will be awarded, however the community may agree as a recognition of this donation, a member of his or her family may be given preferred opportunity for employment (i.e. as a nightguard, cook, etc.)
- The community and landowner is consulted in a manner that is accessible, inclusive and participatory and E & S risks and impacts are discussed.

Land transfer documentation have been reviewed with signatures from landowners agreeing to the transfer and voluntary land donation. This is included in a separate document noted **as Volume 2 of this ESMF** and has been reviewed by the Bank's safeguard specialists.

However, in the event there is involuntary land acquisition, this is dealt with in a separate framework document, the Resettlement Policy Framework (RPF), which as been consulted upon and disclosed, and is based on the existing national laws and the World Bank social safeguards policies which seek to avoid the negative social impacts or to mitigate these impacts where unavoidable.

d) Environmental and Social Management Plan (ESMP)

The ESMP outlines the specific measures that will prevent, mitigate or compensate for anticipated negative environmental and social effects of a proposed project. It helps to ensure an efficient environmental management of the Project. The management plan will include the following:

- (a) The relevant project activities
- (b) The potential negative environmental and social impacts
- (c) The proposed mitigation measures
- (d) Those who will be responsible for implementing the mitigation measures
- (e) Those who will monitor the implementation of the mitigation measures
- (f) The frequency of the afore-mentioned measures
- (g) Capacity building needs
- (h) The cost estimates for these activities

The ESMP will be included in Education Project Implementation Manual (PIM) with costs included.

Where the screening identifies cases which cannot be addressed by simple mitigation measures but which are not substantial to warrant an ESIA, a subproject ESMP shall be prepared and reviewed by the Environmental and Social Specialists. Such plans, indicating the measures to be taken and the resources required shall be included in the works for that particular site.

e) Enhanced E & S Risk Management and Monitoring Capacity in the PCU

There was very limited understanding of safeguards policies, including assessment and management of GBV risks, and specifically SEA/SH risk, and instruments among some of the key personnel such as the Construction Monitors and the PIU which needed to be addressed to ensure they are able to carry out their work satisfactorily. Since 2018 there is increased capacity following training conducted by the World Bank with emphasis on environmental and social safeguards policies and monitoring of the World Bank as well as national regulations. Participants included members of the PIU and the contractors from Future In Our Hands (FIOH). In addition, some PCU staff undertook additional E & S safeguards training abroad (in Morocco). The training focused on identification of risks, mitigation measures, and environmental and social management of projects.

In addition, since 2018, additional capacity has been employed as staff. An environmental specialist has been recruited and a social specialist recruitment process is underway and is expected to be finalized by end of 2020; the social specialist is expected to have a background in gender or GBV prevention and response programming to ensure a familiarity with issues around GBV risk for the project. Meanwhile, international environmental and social consultants have been hired to support the PCU.

f) National and Regional Coordination/Supervision and Budgeting

- **National level the PCU:** The national PCU environmental and social specialists, will coordinate and supervise the Regional Directorates. The NEA will focus on overseeing environmental regulation compliance under its mandate, however, project implementation and supervision of instruments will be undertaken by the E & S specialists in the PCU.
 - **At national level,** the NEA will monitor the implementation of the environmental measures in line with national regulations/laws and will conduct biannual nationwide tours to all project sites on environmental issues as part of their mandate.
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- **In each region,** the Construction Monitors are responsible for completing the *Environmental and Social Risks Screening Form* and the *Environmental and Social Risks Checklists* (Annex 1); and determining the environmental and social category of the screened activity to be able to identify and mitigate the potential environmental and social impacts of construction and rehabilitation activities. They were helped by the environmental and social consultant recruited for the PCU in managing the environmental and social safeguards issues. They have received environmental and social training with the FIOH team (the contractors) to be able to carry out this task by the Environmental and Social specialists from the World Bank.
 - **At regional level,** the Regional Directors, the construction monitors and their cluster monitors will report to the PCU Environmental and Social Specialists, any deviation on the norms set out in the ESMP.
- **The Environmental and Social Specialists in the PCU** will review the classification and the proposed mitigation measures where these are considered necessary, including for risks related to GBV, which encompasses SEA/SH. Following the screening to assess SEA/SH risk for the project, associated measures identified and put into place to mitigate these risks will be outlined in a SEA/SH Prevention and Response Action Plan, which will include an accountability and response framework to ensure appropriate management of and support for survivors in these types of incidents. S/he will ensure that the implementation of the mitigation measures, including within the SEA/SH action plan, is adhered to by the private contractors.

The private contractors are responsible for the implementation of the civil works and the mitigation measures as indicated in the Contractor Environmental and Social Management Plan (C-ESMP) (See Annex 2).

- Monitoring will be carried out at the regional and national levels.

At regional level, the Regional Directors, the construction monitors and their cluster monitors will, in a consistent manner, report to the PCU Environmental and Social Specialists any deviation on the norms set out in the environmental and social management plan.

At national level, the NEA will monitor the implementation of these environmental and social measures and will conduct biannual nationwide tours to all project sites.

Although the project has not triggered Physical Cultural Resources (PCR) OP 4.11, if chance finds occurs, a chance finds procedure is included in Annex 10.

An overall budget for the infrastructure components of this project cannot be made as civil works and unknown at this time. However, Table 1 provides the indicative costing of the main activities with a timeline.

g) Policy, legal and institutional framework

The National Policy Framework

Policies and Procedures

- Gambia Environment Action Plan, GEAP (2009-2018)
- National Health Policy (2012-2020)
- National Climate Change Policy (2016 – 2025)
- The Gambia National Gender & Women Empowerment Policy (2010– 2020)
- Revised National Youth Policy (2016 – 2018)
- National Strategic Environmental Assessment Policy (2017- 2021)
- The Education Sector Strategic Plan (2016 – 2030)
- The National Environment Management Act (1994)
- The Environmental Impact Assessment Guidelines (1999)
- The Environmental Impact Assessment Procedures (1999),

Acts and Regulations

- Labor Act, 2007
- National Environment Management Act, NEMA, 1994
- Environmental Impact Assessment Regulations, 2014
- The Anti-littering Regulations, 2007
- Public Health Act, 1990
- The Children's Act, 2005
- Women's Act, 2010
- Women's Act Amendment Act, 2015
- Sexual Offences Act, 2013

C. 3 International and regional treaties ratified by The Gambia that are most relevant to this project:

- Stockholm Convention on Persistent Organic Pollutants (POPs) (2004)
- UN Framework Convention on Climate Change (UNFCCC) (1994)
- International Bill of Rights¹
- Convention on Elimination of All Forms of Discrimination Against Women (CEDAW) (1993)
- Convention on the Rights of the Child (1990)
- Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICRMW) (1990)
- Convention on the Rights of Persons with Disabilities (2015)
- Constitutive Act of the African Union (2000/2001)
- African Charter on Human and Peoples' Rights (1981/86)
- African Charter on the Rights and Welfare of the Child (1990/99)

¹ The International Bill of Rights includes The International Bill of Human Rights consists of the Universal Declaration of Human Rights (1948), the International Covenant on Economic, Social and Cultural Rights (1978), and the International Covenant on Civil and Political Rights (1979) and its two Optional Protocols.

- Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol) (2003/2005)
- African Youth Charter (2006/2009)
- Protocol to the African Charter on Human and Peoples Rights (ACHPR) on the Rights of Persons with Disabilities in Africa, 2018

As the GESSP has similar objectives to its predecessor, Results for Education Achievement and Development Project (READ) for which an ESMF was prepared, approved and disclosed in 2013. The GESSP ESMF was prepared, approved and published in January 2018. The present study is an update of the GESSP ESMF to reflect activities which will be implemented under the Additional Financing and to take account of recent development such as the COVID-19 pandemic.

Applicable World Bank Policies

- OP 4.01 Environmental Assessment
- OP4.12 Involuntary Resettlement
- Although the project has not triggered Physical Cultural Resources, OP 4.11, if chance finds occurs, a chance finds procedure is included in **Annex 10**.
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Table 1: Environmental and Social Management Plan with responsibilities

No.	Activity	Time Frame	Budget (US\$)	Responsibility to coordinate
1	CAPACITY BUILDING			
	Workshops and meetings to strengthen the capacity of the Regional TACs in managing environmental and social safeguards issues like ESIA SEA/SH issues and RAP	First quarter of the Project implementation	5,000	NEA/PCU/ESS/SSS
	Capacity building of relevant MoBSE staff on environmental and social safeguards, SEA/SH issues and their roles	Annually during project implementation	10,000	MoBSE Management / PCU
	Public sensitization to raise awareness on the Project issues like COVID-19 risks and mitigation measures through relevant radio / TV programs and meetings	First and second quarter of the project implementation	10,000	NEA/PCU/ESS/SSS Ministry of Health
2	ESMP IMPLEMENTATION, MONITORING, EVALUATION AND REPORTING			
	Implementation of the mitigation measures, including for SEA/SH	Annually during all phases	5,000	PCU
	Regular environmental and social monitoring of the implementation of mitigation measures and the activities, including for SEA/SH	Project implementation period	5, 000	NEA/PCU

No.	Activity	Time Frame	Budget (US\$)	Responsibility to coordinate
	Audit of environmental and social measures NEA will oversee the application of environmental law of The Gambia	Every six month or annually	5,000	PCU/NEA/Consultant
	Acquisition of masks and hand washing detergents for schools to prevent spreading of COVID-19	Throughout project implementation period.	5,000	PCU
3				
	Field investigations GM operation with ethical management of SEA/SH complaints included	Project implementation period	5,000	Grievance Redress Committee
	Implementation of GM related to activities and mitigation measures, including ethical management of SEA/SH complaints	Annually during all phases	10,000 (pa)	NEA/PCU
4	Personal protection equipment (PPE)- sanitizers, masks etc. for public consultations, trainings, and site visits		<u>3,000</u>	PCU
5	Monitoring and evaluation of the environmental and social impacts of the project at community, regional and national level		<u>75,000</u>	PCU
6	External evaluation at completion of works		<u>20,000</u>	PCU/Consultant
Total			<u>153,000 USD</u>	

1- INTRODUCTION

1.1. Project Description

The Government of The Gambia in collaboration with The World Bank is developed a project to support the Gambia Education Sector Support Project (GEESP P162890, approved in March 28, 2018 and effective since August 31, 2018). This project is serving as the successor to the Results for Education Achievement and Development Project (READ). A proposed Additional Financing (AF) in 2020 requires this Environmental and Social Management Framework (ESMF) to be revised to reflect new project activities proposed under the restructuring and AF. The GEESP and AF will consolidate the achievements made thus far in the sector by placing particular emphasis on educational access, and improvement of quality of teaching and learning.

1.2. Project Objective

The project development objective (PDO) is to increase access to early childhood development (ECD) and basic education, and improve the quality of teaching and learning. It has three components which have been progressing well, as confirmed during the Mid-Term Review (MTR) completed in July 2020. These include **Component 1, Enhancing Access to ECD and Basic Education**; **Component 2, Improving Quality of Teaching and Learning**; and **Component 3, Technical and Institutional Support**. The Additional Financing provides an opportunity to capitalize upon the roadmap for pre-service and in-service teacher training reforms developed under the original project for long lasting sustainable reforms to increase teacher effectiveness.

The AF will contribute to the goals stated in the Global Partnership for Education (GPE) Strategic Plan (2016-2020) of (i) improved and more equitable learning outcomes, (ii) increased equity, gender equality and inclusion, and (iii) effective and efficient education systems. The AF will aim to improve learning outcomes through systematic improvements to teacher training, including in the vulnerable communities supported by MRC Holland, and improve the education system through strategic management, training, and deployment of teachers.

Component 1: Enhancing Access to ECD and Basic Education

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.

Component 1.1. Expanding the network of basic and ECD classrooms

Sub-component 1.1 supports (i) construction of ECD classrooms; (ii) construction of LBS and UBS classrooms; (iii) a small fund for special needs modifications; and (iv) transportation to schools in targeted communities via utilization of donkey carts.

Construction is expected to begin in October 2020 and is based on a contract between the Ministry of Basic and Secondary Education (MoBSE) and Future in Our Hands (FIOH) who will construct classrooms based on a performance-based 18-month implementation schedule. Transportation is well under way via the innovative donkey cart approach and the project has benefitted from a 21 percent price reduction in fabrication due to the scale up. Finally, the screening tool for better identification of children with special needs has been developed, piloted and finalized with training and data collection to take place once schools reopen.

Sub-component 1.2 Expanding Opportunities and Access for out-of-school children

Sub-component 1.2 is targeted toward out-of-school children and (i) introduces a program whereby select districts in region 5 receive incentives to promote enrolment in school of children age 7-12 via a mix of provision of stationery packages, uniforms, shoes, and nutrition support; (ii) expanded support to koranic centers by supporting integration of reading and mathematics training; and (iii) a pilot second chance education program called the Gambia School of Open Learning (GAMSOL) for out of school children.

There are no proposed changes to the activities under this component under the additional financing

Component 2: Improving Quality of Teaching and Learning

The component aims to improve quality of teaching and learning through (i) sequenced revision of curriculum for ECD through Grade 9; (ii) development of a coherent framework for teacher training; and (iii) effective teacher recruitment and deployment. With the expected additional financing, under this component, the new activities include reforming pre-service education at the Gambian College informed by the comprehensive pre-service and in-service strategy framework and implementation plan and the Gambia teacher competency framework. Also, the additional financing will support the In-Service Training Unit, and finance the introduction of an Induction Program which will provide support for students/teachers and newly graduated teachers.

Sub-component 2.1 Curriculum Revision and Implementation

Sub-component 2.1 supports curriculum revision using a phased in sequenced approach. It includes implementation of ECD curriculum, as well as revision and rollout of curriculum for grades 1-9. It also includes (i) publishing of core subject textbooks for grades 1-9 public school students; (ii) teaching and instructional guides to all public LBS and UBS teachers; (iii) training of teachers and education personnel; and (iv) the refinement and rollout of the classroom observation tool.

Sub-component 2.2 Improved Teacher Training and Professional Development

Sub-component 2.2 supports the development of a strategic framework and coherent policy for pre-service and in-service teacher training, and, via the additional financing, its first two years of implementation.

At the pre-service level the sub-component supports (i) introduction of an externally reviewed and overseen teacher competency test to evaluate graduating teachers; (ii) an external review of the revised curriculum and delivery model. Under the additional financing the sub-component will also support reform of The Gambia College curriculum, capacity building of lecturers and education personnel, small rehabilitation, technical assistance, and provision of technology.

At the in-service level the sub-component finances (i) an analysis of current in-service teacher and development training on offer; (ii) development of a structured framework for continuous professional development; (iii) a set of standards and strategic five year plan for its operationalization; (iv) a set of compulsory and optional training modules; and (v) internal and external quality assurance for its implementation and monitoring. Under the additional

financing support will be provided for the appoint of regional INSET coordinators, capacity building of the INSET unit; and technical assistance.

The teacher and school director training framework includes provisions for technology supported interactive learning, including scale up of the Progressive Science Initiative- Progressive Math Initiative (PSI-PMI) and English Language Arts (ELA) programs.

Lastly, under the additional financing, an induction program for student-teachers and newly graduated teachers will be financed which provides mentorship and classroom training for new teachers.

Sub-component 2.3 Teacher Recruitment and Deployment

Sub-component 2.3 supports a mix of interventions to recruit and deploy teachers. This includes (i) strategic planning for matching supply and demand of teachers in the sector; (ii) payment of a stipend for nonsalaried Diploma in Education and Advanced Diploma in Education trainees at Gambia College; (iii) provision of tuition scholars for UTG candidates; and (iv) hardship allowances for teachers in hardship schools.

Component 3: Technical and Institutional Support

This component supports a blend of technical and institutional support focused primarily on building capacity in data driven decision making; providing communications support and project management and institutional support.

Sub-Component 3.1 Strengthening Capacity for Data Driven Decision Making

Sub-component 3.1 supports (i) continuous implementation of assessment of learning outcomes; (ii) support to strengthening data systems; (iii) funding of a service delivery indicators (SDI) exercise; and (iv) capacity development for improved data driven decision making. Under the additional financing, the project will also support revitalization of the Performance Management System (PMS) which manages and tracks teacher performance.

Sub-component 3.2 Implementation of Communication Strategy

Sub-component 3.2 supports implementation of a communication strategy to support the education sector's strategic initiatives and sensitization of communities. This support is scaled up under the additional financing. The establishment of a communications strategy and team is and will remain critical to COVID-19 response efforts, including school reopening.

Sub-component 3.3 Project Management and Institutional Support

Sub-component 3.3 provides support to the implementing agency for capacity building initiatives and project management. It finances PCU salaries, operating costs, and capacity development.

Under the additional financing there will also be support provided for enhanced technology capacity within MoBSE and the regional offices, via provision of equipment to ensure that there are adequate video conferencing capabilities.

Project Risk Rating

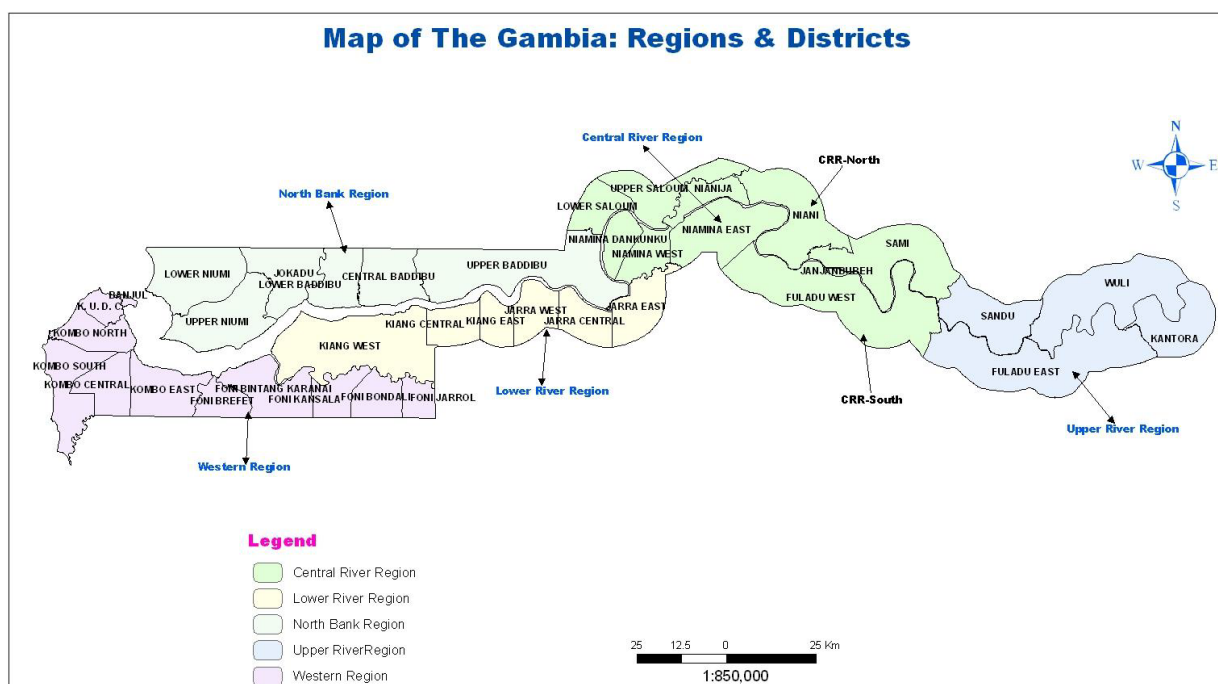
According to the World Bank project classification the GESSP Project is a Category B project with respect to potential environmental and social impacts. Regarding SEA/SH risk, the project has initially been assessed as substantial risk, a rating that will be confirmed, and will subsequently develop a SEA/SH Prevention and Response Action Plan, outlining the risk mitigation measures to put into place over the course of the project. This means that it does not potentially have major adverse environmental or social impacts on human populations or environmentally important areas – including wetlands, forests, grasslands, and other natural habitats. The likely impacts would be site-specific; few if any of them would be irreversible; and in most cases mitigation measures can be designed to address the situation. The Project triggers the World Bank Safeguard instruments notably 4.01 Environmental Assessment because the Project includes a school construction component which could generate negative environmental and social impacts.

To ensure that the potential environmental and social risks of the proposed project are adequately addressed during implementation, an Environmental and Social Management Framework (ESMF) is prepared. The ESMF provides framework for a social and environmental assessment for identified sites and will guide implementation before any infrastructural development takes place. In addition, a Resettlement Policy Framework (RPF) has been prepared, to address involuntary resettlement and other related social safeguards issues which will be implemented in conjunction with this ESMF. Instruments will help assess the potential environmental and social impacts of the proposed project and identify ways of preventing, minimizing, mitigating, or compensating for adverse impacts that could arise during project implementation. This ESMF has also been updated to include mitigation measures for addressing GBV risk, including SEA/SH.

2- PROJECT SITES AND THE BIOPHYSICAL AND SOCIOECONOMIC ENVIRONMENT OF THE COUNTRY

The geographical spread of the project is countrywide covering all the regions except Greater Banjul Area (urban) and the West Coast Region. The biophysical environment as well as the socioeconomic characteristics of the country is presented below. **But the main civil works will take place in Central River Region where 30 new schools will be built. In other regions, interventions will include renovations of existing schools, constructing teacher's quarters, or adding classrooms, and fencing of schools.**

Figure 2.1: Map of The Gambia and Districts



2-1-Physical Characteristics

Geography

The Gambia lies between 13.79° and 16.82° West longitude and entirely within 13° North latitude. It has an estimated area of 11,300 km² and is bounded by Senegal to the North, South and East and by the Atlantic Ocean to the West. The country is bisected by the River Gambia that originates from the Fouta Djallon highlands, forming the North and South banks. Banjul is the administrative centre and capital situated on an island on the southern bank at the mouth of the river. The country has seven administrative regions namely: North Bank Region, Lower River Region, Central River Region, Upper River Region, West Coast Region, Banjul City Council, and the Kanifing Municipal Council.

Topography

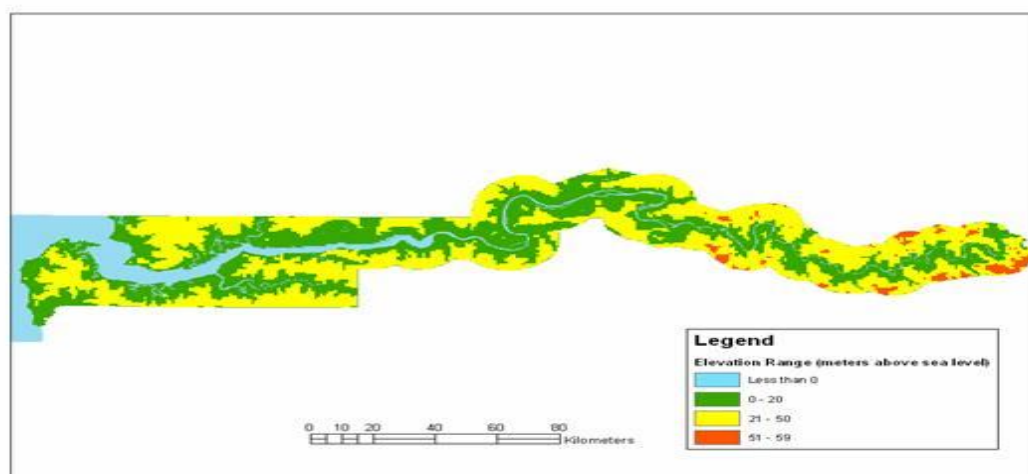
The geomorphology of The Gambia is characterised by the River Gambia and its floodplains, riverbanks and wetlands. The river originates in the Futa Jalon highlands in Guinea, to the south east of The Gambia, from where it flows through south-east Senegal and then westwards into The Gambia, meandering severely and cutting through its ancient sand and sandstone plateau leaving narrow to wide floodplains on either of its banks.

The valley, particularly in the central and western parts of the country, makes up about 39% (or 4,048km²) of the total land area of The Gambia. The country is generally low lying with a gently east

sloping plateau that is dissected by the river with poorly drained alluvial deposits that are subjected to daily and season flooding. These floodplains (and mangrove swamps in the western half of the country) are home to a rich and diverse flora and fauna including hippos and one of the richest diversity in bird species anywhere in the world, as well for rice cultivation.

The highest points in The Gambia (50 – 60m above sea level) are in the eastern part of the country. These are found in the generally unproductive, low flattop lateritic sandstone plateau that sandwich the river in the east of The Gambia. They occupy less than 4% of the total land area of The Gambia (Figure 1).

Figure 2.2: Topographic map of The Gambia showing elevation range above sea level



Between the valley and the sandstone plateau is the dissected ferruginous plateau with sandy hills. These are gently rolling hills which rise to a maximum height of 20 metres near the coast in Cape St. Mary. The natural vegetation of this dissected plateau, grassland and shrubs in the east and present day remnants of multi-layered tropical forest in the south west of The Gambia, characterise the country's vegetation. Groundnut, millet, and sorghum are main crops cultivated in this region.

Climate

The Gambia is characterised by 7 - 8 months of hot and dry Sudano-sahelian climate and 4 – 5 months of rain from June to September. Rainfall is heaviest in August but there are variations with most rain recorded in the south west of the country. Average annual rainfall is 800 mm/year (1960-1990) with lesser rains inland (eastwards) and considerable inter-annual differences. In Banjul, heaviest rainfall in recent years was in 1999, when 1084.4 mm was recorded.

The coastal areas of the country experience relatively lower temperatures. Recent (2004 – 2008) average maximum monthly temperatures in The Gambia range from 31°C in Banjul and as high as 41°C in Janjangbureh in May 2008 with mean minimum monthly temperatures as low as 11.3°C in Kerewan in January 2008.

The wind direction is predominantly north to north-easterly between November and April which coincidentally is the dry season characterised by dry Harmattan winds from the Sahara Desert. It is the moist south westerly wind from the Gulf of Guinea from June to September that brings along the rains. The wind direction is west to northerly for most of the rest of the year. Failure to take in account of the wind direction in siting of buildings may expose them to some flooding during the rainy season as the doors and windows become exposed to direct impacts of the rain.

Drainage

The natural drainage in The Gambia is highly dependent on the River Gambia. As the River enters the Gambian territory it flows generally along an east-west axis, emptying west in the Atlantic Ocean. The major tributaries of The Gambia include the Sandougou, Nianija, Sofaniama, Bao and Bintang bolongs. Similar to the main river, a large portion of these catchments also overlie within neighboring Senegal. Runoff generated from these catchments is however insignificant due to low gradients and permeable soils. Imperfectly drained depressions, inactive streams, and drainage channels further inhibit the runoff process.

2.2 Biological Characteristics

Vegetation

The Gambia's vegetation is dominated by Savannah woodland. The Guinea Savannah, characterized by broad-leafed trees, is dominant in the west of the country. The Guinea Savannah thins into the Sudan Savannah, characterized by shrubs and grasslands, and moving east of the country. Gallery forests and mangroves dominate the coastline vegetation, with the latter extending inland to the saline limit of the estuary.

Water resources

The floodplains, riverbanks and wetlands of the River Gambia are important habitats for wildlife and play an important role in the local economy and livelihood. The flow of the river is highly seasonal with maximum discharge occurring at the end of the rainy season in late September or October with a flow of about 1 500 m³/s; the minimum dry season flow is less than 4.5 m³/s (measured at Gouloumbo in Senegal).

The country's total actual renewable water resources are estimated at 8 km³ per year, of which about 3 km³ are internally produced and the remaining 5 km³ represent the inflow of the River Gambia from Senegal. It is estimated that internally produced groundwater amounts to about 0.5 km³ per year, all of which is drained by the River Gambia and becomes the base flow of the river. Groundwater is available in all parts of the Gambia. The country is located in one of Africa's major sedimentary basins and is often referred to as the Mauritania/Senegal Basin. It is characterized by two main aquifer systems with water table depths varying from 10m to 450m.²

Along the river, the width of the valley varies from 20 to 40 km and three major sections may be distinguished:

- The Upper Valley (UV), where floods occur occasionally, and water is always fresh.
- The Central Valley (CV), where tidal influence exists but water is also fresh. In the lower CV water is fresh only during the rainy season while in the dry season, when the salt tongue moves as far as 250 km upstream, it becomes brackish. Thus, in the dry season, about 220 km of freshwater are left in the Central and Upper River Divisions.
- The Lower Valley (LV), where water is perennially saline because of permanent tidal influence.

² See www.fao.org/nr/water/aquastat/countries/gambia

Water use

Surface water is rarely used as a source of potable water in the Gambia, because of the continuously saline conditions which exist in the lower reaches of the River Gambia and its tributaries. The main source of drinking water is the shallow aquifer at depths of between 10m to 120m and which is recharged by lateral flow and rainfall; hence the through flow is sensitive to rainfall. In general, the water quality of this aquifer is good, with pH around 5 to 6. However, there are some pockets of iron concentration detected in Burreng, Dongoroba, Pakaliba in the Jarras, Bansang in Fulladu, Kuntaur Fullakunda in Niani, and Kekuta Kunda in Badibu.

With regard to saline intrusion, all the coastal zone aquifers of a distance between 0 – 2km away from the main Riverbanks are considered saline risk zones, and this extend up-stream from the coast to Kuntaur 254km inland. (DWR)

Land Cover and Land Use

Forest Cover: The latest figure of the national forest cover is 423,000 hectares or 36% of the land area (Department of Forestry, 2010) which compares with 46% only a decade ago. The Gambia's forest cover consists of mainly savannah woodlands and the mangroves that are found along the Gambia River. There are 66 forest parks covering a total area of 34,029 ha with 25,000 ha under community management. A significant loss of forest cover is said to be due to the loss of mangrove cover estimated to have lost from 67,000 ha in 1981/1982 to 35,700 ha. The mangrove forests are located in the coastal area and inland to the extent of the saline intrusion up the river.

2.3 Socio-Economic Characteristics

Demography

The population of The Gambia is 1,856,417 (2013 Census) which marks an increase of 36.4 per cent during the inter-census period 2003 to 2013 and an annual growth rate of 3.6 per cent per annum. According the World Bank Systematic Country Diagnostic "The Gambia was the ninth most densely populated country in Africa in 2017, with 208 inhabitants per km². Even though The Gambia's fertility rate (birth per woman) is on a declining trend—from 5.8 in 2010 to 4.4 in 2018²⁰—the high annual population growth rate of 3.1 percent between 2000 and 17 contributed to a doubling of the population between 1994 and 2017" Between 1993 and 2010, the proportion of the population living in urban areas increased from 37 percent to 57 percent.

i. Ethnic composition

The Gambia is a multi-ethnic and multi-racial society, exhibiting a high degree of ethnic and religious tolerance. The country's main ethnic groups are the Mandinka, Wolof, Fula, Jola, Serer and Sarahule groups. The Mandinkas constitute the majority of The Gambia's population, followed by the Fula and Wolof groups.

ii. Languages

English is the official language, but the most frequently spoken languages are generally are Mandinka and Wolof. Other languages spoken include Pulaar (Fulbe), Serer, Jola, and Sarahule. Some Muslim clerics are literate in Arabic.

iii. Demographic trends

The population of The Gambia is 1,856,417 (2013 Census) which marks an increase of 36.4 per cent during the inter-census period 2003 to 2013 and an annual growth rate of 3.6 per cent per annum. With this rate of population growth, the population of The Gambia is expected to double in 21 years and the population density of 176 persons/km² makes it one of most densely populated countries in Africa. The population is young, with about two-thirds under age 30 (in specific, 46.2% under 15 years of age; 3.7% over 60 years) as of 2015³ The WHO states that the life expectancy at birth is 59.8 years (male), 62.5 years (Female), and 61.1 years (both sexes).⁴ Over the years, conflict in other western African countries led to an influx of refugees into The Gambia, most notably those fleeing from conflicting in Senegal's Casamance region as well as those who fled from civil wars in Liberia and Sierra Leone.

The overwhelming majority of the population are Muslims. In the rural areas the population is mainly farmers, practicing off-season activities such as gardening primarily conducted by women, hunting, business and migrant labour. The major food crops grown are rice (the staple food), millet, sorghum, findo, maize while groundnuts and sesame constitute the major cash crops. In addition to farming, fishing in river and its tributaries is also practiced by the population.

Table 2.1: Population of The Gambia by local government area (LGA) and age group, 2013

Regions	< 15	15-24	25-34	35-44	45-54	55-64	65+	Total
Banjul City Council	9307	6770	6197	3924	2484	1233	1139	31054
Kanifing Municipal	134345	88815	69933	39695	21957	11590	10802	377137
West Coast (Brikama)	288975	152848	106789	63847	37470	19824	19766	689519
Lower River (Mansakonko)	37498	16239	9919	6257	4488	3025	3616	81042
North Bank (Kerewan)	103328	43380	28104	17757	11897	7261	8252	219979
Central River North (Kuntaur)	47360	18025	12263	7442	4810	3014	3375	96289
Central River South (Janjanbureh)	58063	24914	16418	9986	6388	3873	4599	124241
Upper River (Basse)	112591	47066	31751	18589	11650	7065	8444	237156
Total	791467	398057	281374	167497	101144	56885	59993	1856417

Source: *The Gambia Population and Housing Census, 2013-Gambia Bureau of Statistics*

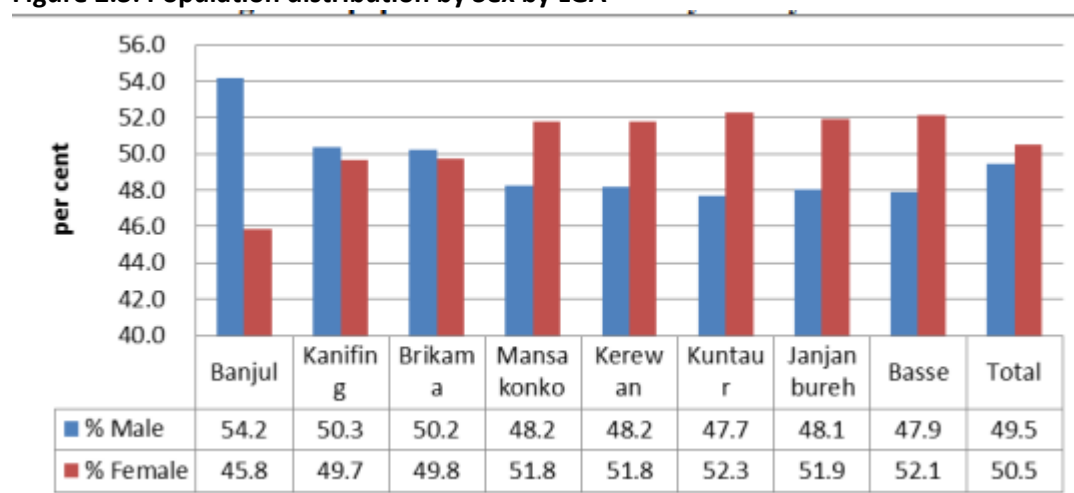
According to the Census (2013), 50.5 per cent of the population are women compared to 49.5 per cent are men, although in the Local Government Areas (LGA) which are predominantly urban, they tend to

³ The World Health Organization. WHO/CCU/18.02/The Gambia Updated May 2018 https://apps.who.int/iris/bitstream/handle/10665/136857/ccsbrief_gmb_en.pdf;jsessionid=BF906C4D78EE43193E0A13D15CE6DB9A?sequence=1

⁴ *Ibid.*

have more males than females. Rural areas have more females than males as indicated in figure 2.3 below. This can be attributed to the movement of males from rural to urban areas and even from outside the country in search of better-paid jobs (GBOS 2013 Census Report).

Figure 2.3: Population distribution by Sex by LGA



Source: The Gambia Population and Housing Census, 2013-Gambia Bureau of Statistic

iv. Youth

The National Youth Policy (2009-2018) defines youth as individuals between 13-30 years; however, this was changed in the Revised National Youth Policy (2015) which defined youth 'as all young males and females aged 15–35 years who are citizens of The Republic of The Gambia.' An estimated 36.7 per cent of the total population; females represent 38.5 per cent and males 34.8 per cent. Banjul, Kanifing and Brikama have higher youthful population than the national average in 2013 census which means that youth are more concentrated in urban areas as opposed to rural areas. The census also showed that the proportion of female youth is higher than the male in all the Local Governments Areas (LGAs). The growing youthful population of The Gambia raises considerations related to meaningful education and skills development, access to safe labor/employment and decent standard of and access to health services, among others. Given low employment opportunities, many male and female youth migrate to Europe – often leading to loss of life en route as well as sexual exploitation and exploitative labor practices, especially of minor youth. Women, girls and boys are also more vulnerable to risks related to SEA/SH and Violence Against Children.

v. Gender and Gender-Based Violence (GBV) and Gender Inequality

Gender disparities in The Gambia are still significant, and the resulting constraints in education, health, income, and legal rights prevent women from participating effectively in national development. This is partly because Gambian society is still very much patriarchal, and women are perceived primarily as wives and mothers whereas men are seen as the main breadwinners. In their assigned role as the main caregivers within the home, women are particularly disadvantaged in the labor market because of the need to combine paid jobs with unpaid work such as childcare and household chores. This leaves them with fewer employment choices. Access to credit is also generally more difficult for women, especially rural women experience discrimination as regards access to credit because they do not own land and cannot offer land as adequate security or collateral. Early marriage and low literacy rates further reduce employment prospects.

Partly because of these equality and equity gaps, the majority of the poor and extremely poor in The Gambia is made up of the women who comprise up to 50 percent of the national population. In 2019,

The Gambia was ranked 174 out of 189 countries with a score of 0.466, according to the UNDP Human Development Report's Index ranking. According to the Gender Inequality Index⁵ (GII), 2016 Gambia was ranked 143rd with a value of 0.622. The poverty of women is closely linked with very low literacy levels (40 percent for women and 64 percent for men) and education attainment rates for a variety of reasons, including restrictive cultural norms and challenges in physical access to school.

Women also experience violence, particularly intimate partner violence, and sexual abuse. Rural women play a limited part in overall decision-making in the family and in how the family income is spent. This low participation in decision-making processes in the household extends also to lower access to decision-making processes and representation in the political sphere. In The Gambia, female genital mutilation (FGM) for girls is still pervasive (76% prevalence rate) as are early marriage and other forms of exploitation with respect to girls.⁶

To address these challenges and reduce gender disparity, the Government formulated policies and legislations to increase opportunities for women and prevent violence against women. The policies include "Gender and Women Empowerment Policy 2010-2020" which has the "overall goal...to mainstream gender in all national and sectoral policies, programs, plans and budgets to achieve gender, equity, equality and women empowerment in the development process." Specific legislation to address these conditions include the Women's Act, 2010, which seeks to eliminate all forms of discrimination against women and the Women's Amendment Act 2015, which specifically prohibits FGM, a provision absent in the 2010 Act. There is also the Sexual Offences Act, 2013, which criminalizes sexual offences against all persons, especially vulnerable groups, including women, children and individuals who have mental and physical disabilities. However, while there have been some legislative gains, this still has not translated into significant outcomes to close gender gaps in a number of spheres.

vi. Violence Against Children (VAC)

Violence Against Children (VAC) is defined as physical, sexual, emotional and/or psychological harm, neglect or negligent treatment of minor children (i.e. under the age of 18), including exposure to such harm,⁷ that results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. This includes using children for profit, labor⁸, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography. In The Gambia, for instance, there have been reports of children, mostly girls, subjected to domestic service and commercial forms of exploitation (i.e., tourism).⁹ Boys in urban areas are known to work as taxi or bus attendants whilst girls work as street vendors, selling food items such as candy, water, fruits for their parents.

⁵ The Gender Inequality Index (GII) reflects women's disadvantage in three dimensions—reproductive health, empowerment, and the labor market—for as many countries as data of reasonable quality allow. The index shows the loss in human development due to inequality between female and male achievements in these dimensions. It ranges from 0, which indicates that women and men fare equally, to 1, which indicates that women fare as poorly as possible in all measured dimensions.

⁶ The Gambia, *Child Protection Plan of Action, 2016-2018* and UNICEF Gambia, https://www.unicef.org/gambia/activities_8342.html.

⁷ Exposure to GBV can also be considered VAC where there is a gender bias and/or the act is of a sexual nature, such as SEA, which is a form of GBV and can be experienced by both girls and boys. Bullying in school, however, may be considered VAC, for instance, but it is not likely to be considered a form of GBV or SEA/SH.

⁸ The employment of children must comply with all relevant national legislation, including labor laws in relation to child labor and the World Bank's policies on child labor and minimum age. They must also be able to meet the Project's Occupational Health and Safety competency standards.

⁹ See note 5

During the implementation of this Project, the potential areas where this can be manifested may include employing children under the age of 18 years in project activities. Children may also be used for personal or financial advantage by both contractors and subcontractors. Any other ways may include using children, for sexual exploitation and physical or sexual violence, especially during the short stay of contractors in the communities.

In this regard, the Project Coordination Unit (PCU) and Contractors must ensure that no aspect of Project works involve children under the minimum age of 16 for light work (as per *The Children's Act*, 2005), and none under the age of 18 for hazardous work and work that affects their schooling and social or moral development.

The Labor Act, 2007 prohibits children under 18 from engaging in agricultural, industrial, or non-industrial work for economic gains. In addition, to strengthen and protect children against possible violence and exploitation, Project codes of conduct, Action Plan for Implementing ESHS and OHS Standards, as well as the SEA/SH Prevention and Response Action Plan must be rigorously applied and monitored for compliance. These codes of conduct will be included in the Contractor's ESMP.

vii. Disadvantaged and Vulnerable Groups

Women are counted among disadvantaged and vulnerable groups as generally marginalized members of society who are unable to participate and benefit from development initiatives fully. They are likewise more vulnerable to risks related to SEA/SH, as explained above. In addition to women, other groups regarded as vulnerable and disadvantaged include the elderly and minors, persons with low levels of literacy, and persons with disabilities. Like women, these groups are more likely to be adversely affected by Project activities, such as civil works, teacher recruitment, training and deployment. They may not also be adequately consulted about the project because meeting times or places are not accessible or because of language barriers when meetings are conducted in languages that are not spoken by all groups. These and other factors can combine to reduce their access to potential project benefits. Disadvantaged and vulnerable groups therefore require specific measures and/or assistance to address their vulnerability to certain risks, including SEA/SH and VAC. These include arranging special meetings with these groups and ensuring that they participate in project activities, providing information in a language that they understand.

viii. Education: Access and Equity

School enrollment has been increasing in The Gambia prior to the crisis. The gross enrollment rate (GER) increased from 2013 to 2019 at all levels of education (Education Management Information System, EMIS); in Early Childhood Development (ECD) from 36.5 percent to 54.6 percent; in Lower Basic Schools (LBS) from 92.8 percent to 117.9 percent; in Upper Basic Schools (UBS) from 68.1 percent to 70.4 percent; and in Senior Secondary Schools (SSS) from 39.0 percent to 49.6 percent. Although the primary completion rate increased from 73.6 in 2010 to 88.2 in 2019, the UBS completion rate has stagnated over the last 10 years (59.5 percent in 2010 and 59.0 percent in 2019).

Although universal primary completion has not been achieved, gender parity of girls has been met at all levels of education. The "traditional" gender disparities have been eliminated from ECD to senior secondary schools, however the post-secondary education level is still lagging at 69 percent in 2015. Girls register a higher GER and net enrollment rate (NER) at ECD, basic and secondary levels, as well as higher completion rates at lower and upper basic levels. Boys' slightly lower enrollment at primary level may be due to higher enrollments of boys in majalis or Koranic schools which are not included in the official school count figure.

Regional disparities in access to education are evident by variations in the GER. As an example, out of the 6 administrative regions, Region 2, close to Banjul, has the highest GER in ECD (65.8 percent) and

in UBS (77.5 percent) while Region 5, a remote region, registers the lowest GER in both ECD (29.2 percent) and LBS (78.1 percent). Region 6 also has low enrollment particularly at upper basic level (37.4 percent) (EMIS 2019). The Government has been targeting interventions in these regions to mitigate socio-cultural and financial barriers that may negatively impact enrollment and completion rates, and it is possible these communities would be hardest hit in a COVID-19 economic downturn given job insecurity and lower access to health services.

ix. Health Sector and COVID-19

The Health sector still faces many challenges, prominent among them are the high infant and maternal mortality rates estimated at 75/1000 live births, and 730/100,000 live births, respectively. (National Health Policy, 2012-2020). The health system continues to be under great pressure due to a number of factors, which include limited budgetary allocation, equipment and human resource.

In The Gambia, the first cases of the novel coronavirus (or COVID-19) were reported in March 2020 at a time when the health system was already struggling to cope with the challenges in the health. A rapid situation assessment of the medical facilities to handle COVID-19 cases at the start of the disease identified a number challenges in the twelve Health facilities identified by the Ministry of Health as major interest sites for treatment and isolation of COVID-19 cases. The challenges identified include the shortage of beds (at the time, only 67 beds); the limited number of medical staff available; the shortage of supply of chemicals for disinfection; and insufficient complete Personal Protective Equipment (PPE).

Table 4.2 shows the health facilities per region and the number of doctors, nurses, and beds available at the time of the assessment.

Table 2.3: Regional COVID-19 treatment and isolation health facilities with number of doctors, nurses, and beds per facility.

Health Facility	Region	No. of Beds	Doctors dedicated or supporting COVID-19 Surveillance or management	Trained nurses dedicated or supporting COVID-19 Surveillance or management
Brikama	West Coast	0	6	1
Bwiam	"	2	6	6
Sanatorium	Banjul	40	12	30
EFSTH	Banjul	2	12	30
Soma	LRR	5	0	3
Kanifing	KMC	1	5	10
Basse	URR	2	1	6
Farafenni	NBR	0	0	0
Essau	NBR	10	1	2
Kuntaur	CRR	0	0	0
Bansang	CRR	2	0	0
Bundung	KMC	3	1	16

Source: The Gambia Covid-19 Rapid Assessment Report- April 2020

COVID-19 Cases in The Gambia

Since March 16, 2020 when the confirmation of the first case of COVID-1) in The Gambia, the total number of confirmed cases as well as the total deaths have been increasing as shown in the Table 4.3 below. To reduce the spread of the disease the government declared public state of emergencies to

restrict movement and ensure respect for social distancing and other national and WHO guidelines. The last state of emergency expired September 17, ending the nightly curfew and allowing all businesses and markets to resume normal business hours.

Table 2.4: the COVID-19 Cases in the Gambia as of 6th October 2020

Country	Active cases	New cases registered	Total Confirmed cases	Cumulative number of recoveries	Total Deaths
The Gambia	1,063	68	3,617	2,437	117
Senegal			15,141	12,936	312

Source: 164th National Situation report on COVID-19 as of 6th October 2020: Ministry of Health

All regions have reported cases of COVID-19 as indicated in Figure 2.4 with the major concentration of the disease in the western region, notably Banjul and Kanifing Municipal area. Despite its population and size, Banjul recorded more cases than any other location within the country (MOH).

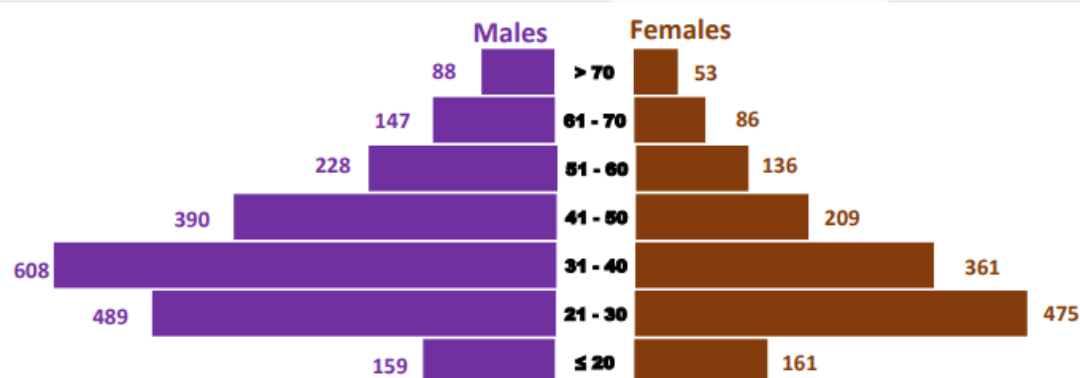
Figure 2.4: Distribution of COVID-19 cases in The Gambia as of October 8 2020.



Source: COVID-19 National Situation Report #131 | 6th October 2020

In terms of age and sex distribution, about 58% of the confirmed cases are male while 60% of the confirmed cases are below 40 years old as shown in Figure 2.5 below. However, the age category 20 years and less have a few more female cases than males.

Figures 2.5: Age-sex distribution of confirmed cases by reported on 6th October 2020



Source: COVID-19 National Situation Report #131 / 6th October 2020

Presently, the main challenges according to the Ministry of Health are:

- Absence of community-based surveillance to shore up demand for COVID-19 tests
- Security lapses at some of the treatment centers resulting in the patients absconding
- Dwindling compliance with mask-wearing requirement
- Low turn-out at COVID-19 sample collection sites resulting in fewer number of daily tests
- Denial, misinformation, stigma, and discrimination against COVID-19 affected families
- The lack of a strong and reliable Internet connection at the NPHL is hampering the implementation of e-surveillance at the laboratory
- Uptick of COVID-19 among healthcare workers

For the education sector, the Presidential address on March 17, 2020, was followed by the closure all schools and education institutions as a measure to protect children and communities to control the spread of the virus. The school closure directly affects at least 674,300 children from early childhood to senior secondary school and more than 15,000 students in postsecondary institutions. On April 1, 2020, the President announced a State of Emergency, which extended the school closure for 45 days, until mid-May. All the schools from Early Childhood Development (ECD) to postsecondary institutions are closed at least until then, with a possible extension of school closure. Meanwhile, since early April, the University of The Gambia has been working to transition to online classes where possible. Across all grade levels, immediate action is required to ensure continuity of learning during the crisis, widely disseminate critical messages and support to impacted communities, and to prepare school systems to reopen once the pandemic subsides.

x. Agriculture

Generally, Gambian agriculture is characterized by subsistence production of food crops comprising cereals such as early millet, late millet, maize, sorghum, rice and findo; semi-intensive cash crop production which include groundnuts, cotton, sesame. Farmers generally practice mixed farming, although crops account for a greater portion of the production. The staple food of the country is rice and the country's per capita consumption is 117kg of milled rice per annum (Direction of Agriculture and Livestock)..

Horticulture is also important and is practiced largely by the women during the dry season and constitutes an important source of income for them. The horticultural crops include onions, tomatoes, small and large pepper, cabbage, lettuce, garden egg, bitter tomatoes, and okra, among others. The principal export crop is groundnut, which constitutes 66% of the earnings from agricultural exports.

3 - OBJECTIVES OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

The objective of this ESMF is to provide an environmental and social screening process for the future infrastructure investments and activities of the proposed Gambia Education Sector Support Project (GESSP). The ESMF describes the steps involved in identifying and mitigating the potential environmental and social impacts of construction activities and new activities under the 2020 Additional Financing related to teacher training, curriculum reforms to The Gambia College, and introduction of an induction program for newly qualified teachers and student-teachers. It will also provide guidance in cases where the screening results indicate that a separate Environmental and Social Impact Assessment (ESIA) is required as per national law. This ESMF has been prepared in recognition of The Gambia's regulations on EIA which include a tool only for pre-assessment of projects based on preliminary environmental and social information. The provisions of the national law on EIA are less comprehensive than those of the World Bank's OP.4.01 Environmental Assessment which calls for the environmental and social screening of all Bank-financed projects.

To close this gap, an Environmental and Social Screening Form (Annex 1) has been designed to assist in the evaluation of planned construction and rehabilitation activities under the education projects that impacts and their mitigation measures, if any, can be identified and/or that requirements for further environmental and social impact assessment be determined.

According to Gambian environmental law, specific investment activities require EIAs, whereas there are no clear EIA requirements for activities of a smaller scale, but which might have negative localized impacts that would require appropriate mitigation. This is the reason why this project will use the environmental and social screening process outlined in the ESMF. This process will allow the PCU to identify, assess and mitigate and monitor potential negative environmental and social impacts at the conception and planning of building and construction stages, and, if necessary, carry out separate EIAs where the screening results indicate the need for such.

The Environmental and Social Screening Form (ESSF) contains information that will allow reviewers to determine the characteristics of the prevailing local bio-physical and social environment with the aim to assess the potential impacts of the rehabilitation activities on this environment. The ESSF will also identify potential socio-economic impacts that will require mitigation measures and/or resettlement and compensation.

In addition, the project has undertaken an assessment for risks related to SEA/SH in this project and has been given a rating of substantial risk. As a result, the project will identify appropriate risk mitigation measures, and develop a SEA/SH Prevention and Response Action Plan, which will outline these measures, including an accountability and response framework. The measures altogether will ensure that workers, project personnel, and communities are informed of these risks, prohibited behaviors, as well as applicable sanctions, and that the project is equipped to respond to these types of cases, such as through locally available service providers as well as trained school-based focal points, and manage any related grievances safely and confidentially.

The ESMF summarizes institutional arrangements for the implementation of mitigation measures, the monitoring, through certain indicators of the implementation of these measures, capacity building needs as well as cost estimates. The ESMF will be included in the Project Implementation Manual (PIM) to ensure it is implemented and monitored. The PIM will explain who will do what and when.

Potential social impacts due to land acquisition such as loss of land and livelihoods or loss of access to economic assets are addressed in the Resettlement Policy Framework (RPF). The RPF has been prepared as a separate document and outlines the policies and procedures to be applied in the event of physical or economic displacement in line with World Bank Operational Policy 4.12.

4-POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT

The policies, legal and institutional frameworks for environmental and social management in The Gambia are summarized below. The international conventions ratified by The Gambia are also presented.

i. Policies

The Table 4.1 below indicates the relevant national policies (listed in order of date adopted) that will guide the development and implementation of the Project.

- Gambia Environment Action Plan, GEAP (2009-2018)
- National Health Policy (2012-2020)
- National Climate Change Policy (2016 – 2025)
- Gambia National Gender & Women Empowerment Policy (2010– 2020)
- National Youth Policy (2009 – 2018)
- National Strategic Environmental Assessment Policy (2017- 2021)

ii. Acts and Regulations

- Labor Act, 2007
- National Environment Management Act, NEMA, 1994
- Environmental Impact Assessment Regulations, 2014
- The Anti-littering Regulations, 2007
- Public Health Act, 1990
- Public Health and Dangerous Disease Regulations 2020
- The Children's Act, 2005
- Women's Act, 2010
- Women's Act Amendment Act, 2015
- Sexual Offences Act, 2013

International and regional treaties ratified by The Gambia that are relevant to this project include:

iii. International and regional treaties ratified by The Gambia that are most relevant to this project:

- Stockholm Convention on Persistent Organic Pollutants (POPs) (2004)
- UN Framework Convention on Climate Change (UNFCCC) (1994)
- International Bill of Rights¹⁰
- Convention on Elimination of All Forms of Discrimination Against Women (CEDAW) (1993)
- Convention on the Rights of the Child (1990)
- Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICRMW)
- Convention on the Rights of Persons with Disabilities
- Constitutive Act of the African Union (2000/2001)
- African Charter on Human and Peoples' Rights (1981/86)
- African Charter on the Rights and Welfare of the Child (1990/99)
- Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol) (2003/2005)

¹⁰ The International Bill of Rights includes The International Bill of Human Rights consists of the Universal Declaration of Human Rights (1948), the International Covenant on Economic, Social and Cultural Rights (1978), and the International Covenant on Civil and Political Rights (1979) and its two Optional Protocols.

- African Youth Charter (2006/2009)
- Protocol to the African Charter on Human and Peoples Rights (ACHPR) on the Rights of Persons with Disabilities in Africa, 2018

Relevant institutions to be involved in the implementation and monitoring of the ESMP are:

- Ministry of Basic and Secondary Education
- Ministry of Health and Social Welfare (MoH&SW)
- National Environment Agency (NEA)
- Ministry of Environment, Climate Change and Natural Resources (MECCNAR)

4.1 Relevant National Policies

Table 4.1: Relevant National Policies

Policy	Description	Relevance to the Project
<i>National Policy for the Advancement of Gambian Women and Girls (1999-2009)</i>	Policy provides a legitimate point of reference for addressing gender inequalities at all levels of government and all stakeholders	Relevant to this Project since it will benefit both men and women equitably through Education and improvement of the curriculum.
<i>Revised National Youth Policy (2016–2018)</i>	Policy aims to mainstream youth issues into the advancement of all sectors in a more coordinated manner	Successful project implementation will encourage youth development through improvement of access to schools and skills learning.
<i>Gambia Environment Action Plan, GEAP (2009-2018)</i>	Integrated environment and natural resources management	Provides guidance in general environmental planning and natural resources management.
<i>Gambia National Gender & Women Empowerment Policy (2010–2020)</i>	To mainstream gender in national and sectoral planning and programming to ensure equity and equality	Women must be consulted and involved in the local monitoring and evaluation process during project implementation.
<i>The National Health Policy, 2012-2020</i>	Protects public and environmental health including nuisance and other risks associated with this Project	Relevant to this Project since pollution and nuisance risks can be associated with the project activities as well prevention and management of communicable diseases such as COVID-19, STIs.
<i>National Strategic Environmental Assessment Policy (2017- 2021)</i>	Aims to ensure environmental sustainability	Applies when developing policies, plans or programs in all sectors, including Education
<i>National Development Plan (2018-2021)</i>	Policy proposes to increase the national coverage of school	Project is a school support project.

4.2 The National Legal Framework

The legal framework that will guide the Project's implementation are indicated in Table 4.2 below, listed in order of date enacted.

Table 4.2: The Legal Framework Relevant to the Project

TITLE OF ACT OR REGULATIONS	DESCRIPTION	RELEVANCE TO THE PROJECT
<i>Public Health Act, 1990</i>	Protects public and environmental health including abatement of nuisances and any condition that may be injurious to health.	This is relevant to Project since pollution risk can be associated with the Project and impact surrounding the health of communities and project workers.
<i>Public Health (Dangerous Infectious Diseases) Protection Regulations, 2020</i>	Provides for the protection of public and individuals against the spread of COVID-19 by putting in place certain restriction in line with national and WHO guidelines.	The measures introduced under this act such as restrictions on public gathering, wearing of masks etc. will help reduce the spread of COVID-19 among the population
<i>National Environment Management Act, 1994</i>	Principal legislation in environmental management; Part V of Act provides for certain projects listed.	This Project falls under Schedule C. that means Project with minor environmental and social potential impacts and risks.
<i>Environmental Quality Standards Regulations 1999</i>	Regulations declare standards set out in Schedule 1 in respect of ambient air, saline waters, surface fresh waters and groundwater.	Project implementation has the potential to generate pollution to communities which must be mitigated in line with these regulations.
<i>Environmental Discharge (Permitting) Regulations 2001</i>	Regulations require that a permit be obtained for most discharges of potentially polluting liquids into or onto the ground (i.e. to groundwater) or into surface waters (such as rivers or streams).	Project implementation has potential to discharge potentially polluting liquids into the Project Affected Area.
<i>The Children's Act 2005</i>	Act sets out the rights and responsibilities of children and provides for their care, protection, and maintenance and defines minimum age for employment of children	Rights of and risks and impacts to children who may be affected by the project need to be protected and mitigated.
<i>Labor Act (2007)</i>	Provides the legal framework for administration of labor, recruitment and hiring of labor, and protection of wages	The project hiring and management of its labor force should adhere to this law, this includes ensuring no child or forced labor, fair and transparent labor hiring practices and timely and fair compensation, among others.
<i>Anti-littering Regulations, 2007</i>	Addresses waste management and pollution issues in relation to	The project must ensure that all waste produced during all phases is well managed.

TITLE OF ACT OR REGULATIONS	DESCRIPTION	RELEVANCE TO THE PROJECT
	environmental health and hygiene	
<i>The Women's Act 2010</i>	Aims to advance women's rights to promote their economic and social empowerment	Relevant to this project in view of potential impact on women; need for adherence to this act to mitigation risk for GBV, including SEA/SH, and prevent discrimination against women in the work place
<i>Environmental Impact Assessment Regulations, 2014</i>	The EIA Regulations elaborate on the requirements for EIA procedure, environmental impact statements, approval, environmental monitoring, etc.	The Regulations provide more details for the EIA of this project and implementation of its ESMP.
<i>Sexual Offences Act, 2013</i>	Updates the law and procedures regarding the trial of rape, sexual offences, and related matters	This Act is relevant to the Project due to the need for protection of vulnerable persons, including women, girls, and boys, within the Project sites against sexual offences, which are defined in the Act.

4.3 Relevant International Conventions and Agreements

The most important of these international conventions and agreements to which Gambia is a Party that are relevant in this Project are as indicated in Table 4.3 below.

Table 4.3: Relevant International Conventions Ratified by The Gambia

Agreement/Convention	Date of signature / ratification	Objective	Relevance to the Project Activities
<i>United Nations Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and the Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women (OP-CEDAW)</i>	Ratified 1993	Convention ensures the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality with men.	The Convention highlights that women's rights are central to their financial independence and may be critical to their ability to earn a livelihood and to provide adequate housing and nutrition for themselves and for their children; women should have access to same benefits of this project as men.

Agreement/Convention	Date of signature / ratification	Objective	Relevance to the Project Activities
<i>UN convention on the rights of the child, (UNICEF 1989)</i>	Ratified 1990	<u>The Convention on the Rights of the Child (CRC) applies to children under 18. It recognises education as a legal right to every child on the basis of equal opportunity.</u> The four core principles of the Convention are: non-discrimination, devotion to the best interests of the child, the right to life, survival and development.	The project could potentially affect the right to health of the child through the generation of air pollution, poor waste management. This Convention recognizes education as a legal right to every child on the basis of equal opportunity.
<i>Convention on the rights of persons with disabilities (CRPD) 2006</i>	Ratified 2013	The Convention intends to protect the rights and dignity of people with disabilities; to promote, protect, and ensure the full enjoyment of human rights by people with disabilities	Persons and learners with disabilities could potentially experience negative impacts from the project activities and the project must address these through appropriate mitigation measures..
<i>Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour</i>	3 Jul 2001	The Convention asserts children must be protected by States from treatment or activities which can be very harmful for their physical and mental health through child labor	No child will be hired for employment for civil works in accordance with this Convention and national law.
<i>Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol)</i>	25 May 2005	Protocol ensures the full development and advancement of women, in order to enjoy human rights and fundamental freedoms on a basis of equality with men.	Women should have access to same benefits of this project as men for their ability to earn a livelihood and to provide adequate housing and nutrition for themselves and for their children.

4.4 Institutional Framework

The institutional framework relevant to the implementation of this Project is as indicated in Table 4.4.

Table 4.4: Institutional Framework

Institution	Specific Responsibilities	Interests and roles in this Project implementation	Level of intervention
<i>Projects Coordination Unit</i>	Supervision of implementation of ESMP and the contractor with its E&S specialists.	Follow up and supervision of the provisions of safeguards document and recommendations of WB policies and Gambian laws.	During the life cycle of the Project
<i>Ministry of Basic and Secondary Education</i>	Oversees the PCU and Education sector Policies and law of The Gambia.	Policy guidance Oversees the PCU management that is key to this Project	During the lifecycle of the Project
<i>National Environment Agency (NEA)</i>	The NEA enforces the NEMA, 1994 and EIA Regulations 2014.	Evaluation of the ESMP report Grant Environmental Approval for the Project Monitoring the project compliance with national environmental regulations during implementation.	During the lifecycle of the Project, but specifically during monitoring phase.
<i>Ministry of Environment, Climate Change and Natural Resources</i>	Oversees the NEA and implementation of environmental laws and policies of The Gambia.	Policy guidance Oversees the NEA Management that is key to this Project.	During the lifecycle of the Project
<i>Office of the Governors</i>	Oversee the Regional Technical Advisory Committees (TACs) for all regions.	The TACs will support the implementation and monitoring processes of the Project at Regional levels.	During the lifecycle of the Project
<i>Ministry of Health</i>	Responsible for overall formulation and direction of the national health agenda, planning and health infrastructural development.	Providing guidance on transmissible diseases (including COVID-19 and HIV/AIDS) to consider during sensitization. Promoting safe and healthy environments at	During the lifecycle of the Project

Institution	Specific Responsibilities	Interests and roles in this Project implementation	Level of intervention
		project sites, including response to incidents of SEA/SH or VAC. Responding to accidents Fumigation of schools.	
<i>Women's Bureau</i>	Under the Ministry of Women, Children and Social Welfare, the Women's Bureau specifically promotes gender equity and women's empowerment in The Gambia.	Ensures the rights women affected by the Project are protected; participates in sensitization on gender issues, including GBV, VAC, SEA, SH	During the lifecycle of the Project
Department of Social Welfare	This government department protects and promotes the rights of vulnerable people such as children, women and the disabled.	Supports and guides the process during related grievances Participates in sensitization on prevention and response to GBV, SEA/SH, VAC etc.	During the lifecycle of the Project

4.5 Environmental Assessment, Review and Permitting

Although several public institutions have responsibility in managing the environment in The Gambia, the National Environment Agency (NEA) is the lead agency responsible for environment policy formulation and coordination of all environment related activities.

Established in 1994 through the National Environment Management Act (NEMA) 1994, the National Environment Agency (NEA) has the responsibility to implement and oversee the EIA. The Act provides for the establishment of the National Environmental Management Council (NEMC) which oversees environmental policies, environmental standards, guidelines, and regulations proposed by the NEA and the Technical Advisory Committee (TAC). NEMA also established two other institutions involved in EIA process: The National Environmental Management Council (NEMAC) and the Technical Advisory Committee (TAC).

All projects likely to have environmental impacts are obliged by the Environmental Act to carry out an EIA prior to authorization. Legislation stipulates that it is NEA's role to coordinate, assess, control, and evaluate the utilization of the natural resources of the country, and in doing so, to promote their preservation and rational use. It should also coordinate the activities around the Environment, to ensure the integration of environmental variables in the process of planning and managing socio-economic development.

In the environmental management of these activities, the NEA will be responsible for giving the final approval of environmental assessments and certifying the compliance of the proposed activities with Gambia's environmental protection legislation. This process will include the following:

- Review, evaluate, and approve submitted EIA in collaboration with other concerned ministries; and
- Monitor to ensure that the MOBSE and its contractors satisfactorily implements the environmental aspects of the ESMF throughout the Project life cycle in line with national regulations and laws.

4.6 World Bank Safeguard Policies Triggered by the Project

These include:

- OP 4.01 Environmental Assessment.** The objective of this policy is to ensure that projects financed by the Bank are viable and both environmentally and socially feasible and that risks and impacts are mitigated. It covers the impacts on the physical environment (air, water, and land, etc.); the living environment, health, and safety of populations; person and vulnerable groups, physical cultural resources; and environmental and social concerns at cross-border and global level. This policy also requires inclusive and accessible including public participation and stakeholder engagement and a mechanism to address grievances to enhance social sustainability and citizen engagement.
- OP 4.11 Physical Cultural Resources.** Avoid or mitigate adverse impacts on physical cultural resources. However, in the event there are chance finds, this procedure is included in Annex 10
- OP 4.12 Involuntary resettlement.** This policy aims to avoid resettlement where feasible or, at least minimizing it. However, there will be no physical or economic displacement in this project, for the building educational facilities. Individuals and communities have voluntarily donated land for this purpose and is documented in Volume 2 of this ESMF. **Community Health and Safety**

Measures to address community health and safety seeks to anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances including the transmission of communicable diseases (including COVID-19 and STIs/STDs); avoid or minimize community exposure to project related traffic and road safety risks; mitigate risks related to SEA/SH in the execution of project activities and ensure ethical and appropriate review and response protocols to manage such incidents of abuse or violence; and to ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to project-affected communities. The screening process will identify the potential risks and negative impacts and shall propose the measures required to address them.

5 - ENVIRONMENTAL AND SOCIAL IMPACTS OF THE GESSP

The infrastructure works of the GESSP Project will generate environmental and social impacts which could be either positive or negative. Below are some of the impacts likely to arise as a result of the Project.

5.1 Positive Environmental and Social Impacts

Overall, the GESSP Project is likely to have a positive impact on the socio-economic development of The Gambia and in access to education for school aged, and pre-primary aged children in under served areas, and also in the environment of surrounding communities. Some of the positive impacts include:

- Construction and rehabilitation of water and sanitation facilities would create improved disposal of human waste and improved hygiene which could reduce the transmission of water related diseases such as diarrhea. This development would positively impact on the student community and populations of the satellite communities.
- Availability of water and toilets will help in the mitigation of COVID-19 risk.
- The provision of school wells will help support gardening which could be improve the school feeding diet and also help generate interest in agriculture.
- Some of the communities lack potable water supply, the water supply points in the schools would make water available for the local community which can greatly improve the quality of life.

For the water supply infrastructure, the construction of water supply facilities (boreholes, watering points, wells, etc. have been built in almost all sites) will contribute to improving the availability of water not only to the schools but also to the surrounding villages particularly in places affected by water shortage. This will reduce both the time and energy spent by women and girls to fetch water who bear this responsibility. Thus, these achievements will contribute to improving the health situation of the children and the local populations by making available to them clean water.

- For the agricultural activities that may develop because of the wells these could bring about improvement of nutrition standards of the children by making use of the garden produce in the school feeding programme.
- Employment during works and operation with its associated social benefits such as better living standards (Around 10 people per site, 7 of them will be unskilled workers)
- Increased access of temporary income generation opportunities for women through petty trading targeting Project workers
- Improved education service delivery thanks to better curriculum and improvement of educational facilities
- Increased safety for children who do not have to travel long distances to go to school
- Improved access to education to girl children since close proximity can enhance the opportunity for girls to attend school where parents may not have sent them otherwise
- Improved teacher retention as a result of some schools having access to teachers quarters,
- Improved sanitation facilities for children
- Improved curriculum and teacher training for better education quality, and better future for the children

5.2 Negative Environmental and Social impacts

A summary of the major negative environmental and social impacts of the construction component is provided in **Table 5.1** below. These negative impacts can arise before, during and after construction. The environmental and social screening process proposed in the ESMF will ensure that the potential

negative impacts are identified, and appropriate mitigation measures instituted as recommended in the Table 5.1 below.

It is recommended that Contractor Environmental and Social Management Plan (C-ESMP) is used to ensure that the construction activities are carried out in compliance with the mitigation measures proposed in the ESMF. These guidelines will be included in the contractual agreements and form the basis for monitoring compliance.

Generally, **the expected number of workers on construction sites is on average 10 people** which includes around 3 to 4 from outside the community and the rest are usually recruited from the beneficiary community FIOH is planning to build temporal accommodation in the site to host workers coming from outside the community. This is already costed by the Contractor.

The period of stay is between 6-12 months. However, some adverse impacts such as community exposure to project-related traffic and road safety risks, risks related to SEA/SH as a result of external worker influx into communities, as well as during teacher training and recruitment, female beneficiaries and workers may be at risk of GBV, including SEA and SH. There are also risks of discriminating against vulnerable groups, such as women, in terms of employment opportunities on the work site and in the recruitment of teachers and selection of candidates for training. With respect to persons with disabilities, there is the risk of access to built environment as well as access to communication of information in languages or formats that do not meet their needs.

Direct impacts on ecosystem services, such as forests, may occur, which have been addressed. Other mitigating measures have also been included in the Contractor Environmental and Social Management Plan (C-ESMP). In the latter case, it is recommended that contractors sensitize their workers on the social norms and safety regulations required whilst working in the communities, including in relation to SEA/SH risks. The Project has developed a protocol to mitigate the risk of COVID-19 transmission during consultation and civil works (see Annex 3).

After Project implementation, the education system also creates risks for SEA/SH in school settings, e.g., trading sex for grades or sexual harassment between teachers in schools. The Project must work on mitigating those risks in the school environment.

A: Physical Environment: Potential negative impacts and mitigation measures

i) Air quality impacts

During land clearing and all construction activities, excavations and handling of earth materials will create dust pollution. Although the likely nuisance will be confined to the site locality and of short-term nature, most of the villages which will host school are few populated.

Mitigation

Access to construction sites must be controlled, particularly in built-up areas, and communities (including schools) given long notice before works to ensure sites are cleared. Construction materials must also be dispensed at strategic locations away from community activities. It will also be necessary to:

- Sensitization of local populations
- Monitoring the wearing of protective equipment and awareness campaigns
- Regularly maintain equipment and construction machinery
- Wearing dust masks for site personnel

ii) Geology and Soils

Sand and gravel to be used for construction of educational infrastructure, teachers squatter may be mined illegally from unapproved sites causing secondary negative impacts on landscape and vegetation.

Mitigation

Contractors must be cautioned through the clauses in their contracts to use only certified sand and gravel suppliers that have been approved by the NEA and Geology Department.

iii) Improper waste management

The possibility of soil disturbance during excavation for the schools foundation and teacher squatters may result or contribute to localized soil erosion based on the topography of the area.

During construction in the short-term, solid wastes, unused construction materials, packaging material are usually abandoned around sites creating eyesore and health risks.

Mitigation

All excess materials and waste produced in the process must be collected and the surrounding land returned to its original state. Some waste materials such as packaging and rubble may have other uses and shall be given to workers or communities for reuse.

All waste produced from the Project activities must be well managed to prevent indiscriminate dumping and cause for scavenging by communities. For the management of used oils, waterproofed areas will have to be set up within the fixed site installations to receive sealed bottoms for the storage of used oils. Quantities of stored oil should be collected at regular intervals and routed to treatment companies licensed by the National Environment Agency.

B: Biological Environment: Potential Negative Impacts and Mitigation Measures

i) Negative Impacts on Vegetation and Wildlife

Even though the impact will be low given the minor scope of civil works regarding construction of schools, the clearance, disturbance, or fires on both mature and young trees will affect dependent wildlife species and communities that depend on the vegetation products. Other benefits that may be secondarily reduced include ground water conservation that occurs due to increased water carrying capacity of the soil through the roots, and reduced evaporation from the tree canopy protection; nutritive quality of the forest topsoil from organic matter and reduced force of rainwater runoff, soil erosion and desertification. The design of the schools has avoided impact on trees, and very few, if any, trees will be affected.

Mitigation

No fires and burning activities will be allowed by the contractors to prevent forest fires. Communities shall be allowed to benefit from felled trees for collection of fruits and dry wood as usual if the construction of school impact some trees.

ii) Negative Impacts on Agriculture

As explained regarding the voluntary land donation, communities are freely giving up their farmlands resulting in loss of land, income and livelihood.

Mitigation

Project affected persons were consulted and informed of the Project prior to commencement. They reiterated their will to freely give their land to have the school for a better future of their children. The agreement between the landowner and the communities is to hire one of the family members of the landowner as security agent, cook, or any other opportunity available at the schools.

C: The Socioeconomic Environment: Potential Negative Impacts and Mitigation Measures

i) Negative Impacts on Public Health and Safety

During land preparation, construction, and installation activities of civil works, there is risk to public health and safety. Communities and children in particular, are at risk of accidents from the equipment, traffic and improperly handled, placed or temporarily stored materials. Waste produced during works can also be a health and safety hazard to the surrounding communities within the Project sites. Hosting communities may also be exposed to COVID-19 as well as risks for SEA/SH due to the presence of outside workers in their communities.

Mitigation

Air emissions shall be controlled to prevent nuisance to populations during works that shall only be carried out during daytime with affected populations informed before commencement.

Access to work sites must be restricted in order to avoid accidents and theft incidents. Activities must be coordinated well to prevent accidental destruction of property through invasion by equipment and machinery. Waste and disused infrastructure should be removed from all Project sites whenever produced. Safety signs and symbols shall also be used at strategic locations.

All workers will be educated on the risks and prevention of sexually transmitted infections. The project will implement measures to raise local community awareness about sexually transmitted disease risks associated with the presence of an external workforce and include local communities in awareness activities. Awareness-raising will also include dissemination of information around GBV, SEA/SH, and VAC risks, including information on prohibited conduct, available services, and related complaint procedures. This is also an important measure to avoid social conflicts. The Codes of Conduct must be enforced and all new project workers will receive training on their contents and signed by them. The Project will monitor their implementation. A sample Code of Conduct is included in Annex 11.

Contractors will ensure that enough PPE will be available for workers and visitors.

To prevent the spreading of the COVID-19, outside workers will respect social distancing, wear their masks for their first fourteen days in the community.

ii) Negative Impacts on Health and Safety of Workers

There is risk of health and safety to workers during implementation of GESSP. Hazards include fumes, working with heavy equipment and parts, loud noise, road traffic accidents, chemical handling. The risk of COVID-19 spreading needs to be mitigated for the safe implementation of the Project. The PCU will provide ample masks, hand sanitizer and will enforce practicing social distancing in every site and during teacher recruitment and training. Risks related to sexual harassment in the workplace must also be addressed.

Mitigation

Workers must be informed of the associated hazards and risks, including regarding sexual harassment; training on the job and knowledge on procedures to reduce risks, including coordination and communication to avoid accidents, as well as information on prohibited conduct regarding sexual

harassment, available services, and relevant complaint procedures. Fire extinguishers, personal protective equipment and first aid kits shall be provided, and training given on how to use them. Reporting of incidents is also essential for the review and improvement of safety procedures.

iii) Negative Impacts on Affected Communities

There will be workers living in the communities in the Project affected areas. The Contractor will build temporary accommodation in the school sites in each village to host workers coming from outside the community to mitigate the risk of COVID-19 spreading and the risk of SEA and SH. The Project must ensure proper sensitization to avoid competition for food, water between the contractor's staff and local communities.

Hosting of workers by affected communities and training and recruitment of female teachers and may indirectly lead to the increase in risks of spreading sexually transmitted infections (STIs), COVID- in addition to risks associated with GBV, including SEA, SH, and VAC.

Mitigation of Risks of COVID-19 and other Communicable Diseases

- Most of the unskilled workforce shall be sourced locally to reduce the need for importation of workers. Employing local workers enhances community cohesion as the local workers know the community, culture, and norms, which may also help decrease risks of COVID-19, GBV SEA/SH as well as the spread of STDs and other communicable diseases such as COVID-19.
- Nonetheless, to prevent STDs and COVID-19, as well as mitigate risk associated with SEA/SH, it is essential that Contractors are required through the contracts to educate their workers on the risks and prevention methods before, and regularly during works. Similarly, measures to educate and sensitize both workers and community members on the dangers as well as mitigation measures related to the prevention of acquiring STIs will be implemented. There will also be strict monitoring to ensure adherence to the relevant Codes of Conduct (COCs). These COCs shall specifically prohibit SEA/SH, including any sexual relations with community members, and establish applicable sanctions for any infractions.
- Other mitigation measures include:
 - MoBSE and Contractors providing surveillance and active screening and treatment of workers
 - Ensuring the Contractor routinely reviews relevant codes of conduct, as well as the Action Plan for Implementing ESHS and OHS Standards, and any relevant provisions under the Project's SEA/SH Prevention and Response Action Plan, with Project workers, including mandatory reviews with new workers to a Project site to ensure all workers understand behavior expectations and SEA/SH risks. The Social Safeguards Specialist of the Project will attend sensitization meetings to ensure they are taking place. The Codes of Conduct are meant to:
 - Create awareness of the ESHS and OHS expectations on the project;
 - Create common awareness about SEA/SH and VAC;
 - Ensure a shared understanding that SEA/SH and VAC have no place in the Project;
 - Create a clear system for responding to and sanctioning SEA/SH and VAC incidents.

Regarding the global coronavirus pandemic, the PCU and contractors shall rely on the protocol already developed (see Annex 3) and based on national, WHO and WB guidance for safety of workers and community beneficiaries. These include hand washing with soap/detergent, wearing of masks and social distancing. Handshakes are to be avoided while sneezing should be done using the elbow to cover the nose. In terms of public consultations, there should not be more than 10 people in any

consultation and each should maintain a distance of at least 2 meters. This should be closely monitored by the E&S specialists of the PCU to ensure contractors staff will closely follow these measures.

iv) Negative impacts on Vulnerable Groups

There is the risk of discriminating against vulnerable groups, such as women in the recruitment of workers at construction sites, and in the recruitment and deployment of female teachers and in the selection of teachers for training, in addition to SEA/SH-related risks for female workers and teaching personnel as well as girls and boys in school settings. With respect to those with disabilities, including learners with disabilities, there could be adverse impacts on their inability to access built environment and access to communication of information in a language or format that is not accessible. This also includes those with low levels of literacy.

Mitigation

Ensure that the recruitment process is fair and transparent, giving equal opportunity to all applicants and that information about the vacancy is accessible to all in a timely manner. Assistance will be provided by the VDC or the Regional Construction Monitor for those who apply for work but who may not be able to submit an application due to illiteracy. For vulnerable groups with physical disabilities and may not be able to access buildings, there should be ramps to ensure access. For project communication (both for the workers and the community members), information should be given in the relevant language and in an accessible format, which also includes considering the needs of those who are speech, sight, or hearing-impaired. Measures to mitigate SEA/SH risks should also be taken into account, including codes of conduct, relevant awareness-raising and training, and information around complaint procedures.

v) Risk of Child Labor

In the Labour Act, 2007, the age of employment for children is 18, although they can be employed for light work at 16. Contracts with communities for services, such as providing water for the project, may include risks of child labor for minors below the age of 16, including when the parent contracted is indisposed, he/she may ask her child to work in his/her place during his/her absence.

Mitigation

The contractor should ensure that any person working or providing services complies with all relevant labor legislation, including labor laws in relation to child labor and World Bank's safeguard policies on child labor and minimum age. Any temporary replacement should meet the age requirement and must also sign and be trained on the Codes of Conduct.

vi) Risk of non-payment work/services rendered by community members and other workers

There is a risk that the contractor may, particularly towards the end of their work refuse to pay workers and service providers for their labor.

Mitigation

With the assistance of the CLO and the VDC who will be trained before project implementation, ensure that workers have valid employment contract and sensitize communities adequately about the grievance mechanism, how to lodge complaints and encourage them to report such cases to the grievance redress committee (GRC) before the contractor leaves the community. No conformity regarding fair labor practices will be subject to a fine or deduction on submitted invoice.

vii) Negative Impacts on Chance Finds Cultural Heritage

Even though there are no known sites of cultural heritage to be affected by the GEESP, there is always a possibility of finding cultural heritage by chance, particularly during land identification and preparation for works. These may be disturbed or lost due to lack of knowledge in managing cultural heritage discovered by chance, and OP 4.11 will be triggered.

Mitigation

Based on this ESMF, the GEESP shall avoid locating and designing activities that will affect cultural heritage. C-ESMP will further determine, through public consultations, whether there are likely discoveries of cultural heritage in proposed Project sites. If applicable, the Chance Find Procedures described in Annex10 will be applied; avoid further disturbance and secure discovery, inform the supervisor for onward conveyance to MoBSE and subsequently the National Council for Arts and Culture (the legal institution responsible to manage cultural heritages).

Table 5.1: Potential Negative Impacts and Mitigation Measures for the infrastructural component of the GEESP

Phase		Potential impacts	Mitigation measures
Pre-construction Land clearing and preparation: bulldozing, excavating, and backfilling with earth; transportation and mixing of materials	Environmental	Deforestation for construction site access and opening of new quarries Felling trees Accumulation of waste and debris during construction Dust and air pollution	Replanting of the number of trees cut within the school or another public institution and rehabilitation of quarry to an acceptable standard Contractors must be cautioned through the clauses in their contracts to use only certified sand and gravel suppliers that have been approved by the NEA and Geology Department
	Social	Disruption of community life resulting in community hostility and lack of support for project	Undertake adequate sensitization from start and promote the active consultation and participation of the community in the project and also sensitize the workers about the community values and expected standard of behavior in the receiving community prior to the start of civil works.
		Potential loss of cultural heritage from chance finds during construction	Consult communities whether there are likely discoveries of cultural heritage in proposed Project sites. If applicable, the Chance Finds Procedures described in Annex 10 should be applied;
		Contamination may spread offsite through air, surface water, or improper disposal	Ensure that proper disposal methods for waste are in place before the start of the construction works

Phase		Potential impacts	Mitigation measures
		Risks of conflict with community as a result of SEA/SH and VAC risks given that workers will be living with affected communities	Sensitization of workers about the receiving community's values and about the project's zero tolerance for GBV, VAC, SEA, SH. Codes of conduct must be enforced and monitored, companies, managers and staff must sign the codes of conduct before civil works start and these will be explained to the workers through awareness raising workshops, including information on SEA/SH complaint procedures
		Risks to public health and safety during implementation of activities from SEA/SH COVID-19 and other infectious diseases Contamination of SDT/STIs and COVID-19 to workers, affected communities and Education staff	Initiate sensitization and education programs for communities and workers on the risks of COVID-19 infection and the health guidelines on wearing masks social distancing and hand washing. Communities to be also sensitized on the dangers and mitigation measures to address STD/STIs. The Contractor will build temporal accommodation in the school sites in each village to host workers coming from outside the community to mitigate the risk of COVID-19 spreading and the risk of SEA and SH.
Construction	Environmental	Degradation of storage sites of construction materials and equipment	Regular collection and evacuation of work site refuse in authorized dumps
		Air pollution due to vehicle rotation, noise, dust etc.	Put in place safety measures to reduce vehicle rotation and water the main road arteries used by vehicles in the community and school to reduce dust
		Pollution and noise nuisances; degradation of the living environment	Put in place a system to reduce noise and sensitize the operators of these engines
		Air pollution during the burning of some work site wastes (wheels, papers, etc.)	Ensure that burning of reuse takes place at least 100 m from the work site

Phase		Potential impacts	Mitigation measures
		Impacts on protected areas and habitats for rare species or of ecologic or domestic importance.	Avoid excavations of building materials in natural protected areas.
		Potential pollution of the quality of surface and groundwater	Install work sites far from waterways Regular collection of work sites refuse towards authorized dumps Ensure adequate spacing between latrines and water supply points
	Social	Conflicting demands on surface or groundwater supplies between the contractor and the community in terms of quantity and timing of the use of the facilities	Develop alternative supply source and if that is not feasible ensure that the contractor's water requirements can be supported by the community water supply system and finally ensure there is no conflict with the timing of the use of the facility.
		Risks of accidents at work sites and in the community during working hours	Conduct an awareness raising campaign for the work sites staff, the school schoolboys, teachers, and the local community Reduce speed limits for vehicles travelling through the community
		Risks related to SEA/SH at work sites and between workers and community members	<ul style="list-style-type: none"> Establish and require workers and project personnel to sign codes of conduct prohibiting SEA/SH and outlining sanctions The Contractor will build temporal accommodation in the school sites in each village to host workers coming from outside the community to mitigate the risk of COVID-19 spreading and the risk of SEA and SH. Establish project grievance mechanism with specific procedures to manage SEA/SH-related complaints ethically and confidentially, including response protocol

Phase		Potential impacts	Mitigation measures
			<p>with appropriate service referrals</p> <ul style="list-style-type: none"> • Train workers and project personnel on SEA/SH, prohibited behaviors, sanctions, and GM procedures • Conduct community awareness-raising on SEA/SH, prohibited behaviors, and GM complaint procedures for SEA/SH incidents • Create female-friendly work environment with safe discussion spaces for women and targeted hiring of women in non-traditional roles and supervisory positions on work sites, as well as appropriate lodging and sanitation facilities on worksites that are sex-segregated, secure, and well-lit • Include SEA/SH mitigation measures in all bidding documents and vendor contracts, including for supervision consultants, and ensure that successful vendor hires a Social Specialist with GBV and/or gender background to monitor SEA/SH risk and implementation of associated risk mitigation measures.
		Risks to public health and safety during implementation of activities from COVID-19 and other infectious diseases Contamination of SDT/STIs and COVID-19 to workers, affected communities and Education staff	<ul style="list-style-type: none"> • Initiate sensitization and education programs for communities and workers on the risks of COVID-19 infection and the health guidelines on wearing masks social distancing and hand washing. Communities to be also sensitized on the dangers and mitigation measures to address SDT/STIs.
		Non-use of local workers	Prioritize hiring local labor and ensure transparent and fair hiring practices, including the

Phase		Potential impacts	Mitigation measures
			recruitment of women, and in non-traditional and supervisory roles where possible
		Disruption or destruction of sites of cultural, historic, or religious importance	Avoid siting the facilities in places that will impact historic, cultural, or traditional use
		Chance finds of cultural & historic artefacts	Apply the required procedures as defined in the present document which is in line with the NCAC Act 2003 and in Annex10
		Disturbance of school and education activities during works	Arrange to have truck deliveries after school hours, in the evenings or on weekends and select work periods to avoid as much as possible periods of classes.
		Disturbance of the circulation of goods and persons by the engines, the storage of materials in the community	Design traffic deviation plans approved by the concerned administrative authorities; Make careful selection of installation sites; Conduct an awareness raising campaign before the start of the works
		Risk of child labor which may have an impact on the education of the child.	Contractor to ensure that any person working or providing services is above the minimum age of 18. Similarly any temporary replacement should meet this condition and proof of age should be provided ie birth certificate/ national ID and shall receive training on the Codes of Conduct and COCs signed.
		Risk of non-payment of work/services rendered by community members and other workers	Ensure that there is a valid contract for the work and that communities are adequately sensitized about the grievance mechanism, on how to lodge complaints and encourage them to do so for such cases. In case of non compliance, invoices from contractors will be blocked until proper correction will be done. Works can be suspended if necessary.

Phase		Potential impacts	Mitigation measures
		Risk discrimination against vulnerable groups, including women, children, and people with disabilities	Ensure that the recruitment process is fair and transparent giving equal opportunity and that vacancy announcement is accessible to all in a timely manner. Ensure ramps exist in buildings or wheelchairs are available to facilitate moving around. For information access, provide information to workers and the community members in the language they understand and in a format that is accessible. SEA/SH risks must also be addressed for the same vulnerable groups, including application of the same mitigation measures cited above under community health and safety risks.
Post Construction	Environment	Inadequate cleaning and maintenance service, creating unhygienic conditions, and as a result students avoid using latrines	Employ caretakers to regularly clean the toilets and promote personal hygiene education in the school and in the community.
		Students defecating in open areas/bush	Design, promote and conduct public hygiene awareness campaigns focusing on adverse health impacts of open defecation and promote latrine use. Similar sensitization should also be carried out in the communities to promote attitudinal change
		Development of water related diseases (malaria, bilharzias, etc.)	Improve the hygiene around water supply points and promote personal hygiene education in schools
		Contamination of water source / supply	Protect water sources from contamination from runoff from nearby agricultural areas (e.g. silt, agro-chemicals, animal waste); ensure that well covers are properly sealed to prevent seepage of surface water back into the well. Conduct regular water quality tests.

Phase		Potential impacts	Mitigation measures
		Presence of iron in the water supply	Conduct tests to verify the level concentration is within safe limits i.e. 0.3 milligrams per liter (mg/l),
	Social	Negative social and economic impacts on existing community water management practices and relationships Conflicting demands on surface or groundwater supplies	Minimize water use Modify design to allow water harvesting Agree with the community when the contractor can use the water facility to avoid conflict with the time when community needs water.
		Nonpayment of work and services rendered to the contractor	Ensure there is a valid contract with the workers and ensure that all such liabilities are cleared before the final payment of the contractor. In case of non compliance, invoices from contractors will be blocked until proper correction will be done. Works can be suspended if necessary.
	Human Health	Illness or disease due to poor water quality	Ensure water source is fit for drinking, through regular water quality testing and treatment if necessary Assess present and future source / supply contamination risks and minimize them through:
		Risks related to SEA/SH at work sites and between workers and community members	Include SEA/SH mitigation measures in all contracts, including for supervision consultants, and include SEA/SH and VAC in the curriculum for teacher training.

6 -THE ENVIRONMENTAL AND SOCIAL SCREENING PROCESS FOR CONSTRUCTION OF SCHOOLS

6.1. The Environmental and Social Screening Process

The sections below illustrate the stages of the environmental and social screening process for this Project leading to the review and approval of the education project activities to be implemented. The purpose of this screening process is to determine which activities are likely to have negative environmental and social impacts; to determine appropriate mitigation measures for activities with adverse impacts; to incorporate mitigation measures into the project as appropriate; to review and approve the project's proposals; and to monitor environmental and social parameters during the

implementation of activities. This screening process was done in the same time with the consultation of affected communities to verify the voluntary land donation process and how it will affect landowners and the mitigation measures established within the community and how the GESSP can improve those measures.

As noted above, with regard to SEA/SH risk specifically, the project has undertaken an assessment for these specific risks and been given a substantial risk rating. As a result, the project will identify appropriate risk mitigation measures, and develop a SEA/SH Prevention and Response Action Plan prior to the start of project activities, which will outline selected measures and incorporate an accountability and response framework, including a grievance mechanism adapted to handle SEA/SH complaints ethically and confidentially.

The extent of environmental and social work that might be required prior to the commencement of the projects depends on the outcome of the environmental and social screening process described below.

The process of screening can be broken down into the following steps:

Step 1: Screening of the Education Project's Infrastructure and Locations

The initial screening in the field has been carried out by the Construction Monitors (CM) of the Project Construction Unit located in each Region in consultation with and the support of the Regional Environmental Program Officers and the environmental and social safeguards consultant of the PCU. The CM will undertake the screenings, under the guidelines of the NEA and complete the Environmental and Social Screening Form (Annex 1) and identify the potential environmental and social impacts, determine their significance, and recommend the appropriate environmental category, propose appropriate environmental and social mitigation measures.

To ensure that the screening form is completed correctly in the various project locations, environmental and social training has been provided to the Regional Monitors who will closely work with the Environmental and Social specialists of the PCU and other MoBSE stakeholders by the World Bank environmental and social safeguards specialists.

Step 2: Assigning the appropriate Environmental and Social Categories

The assignment of the appropriate environmental and social category to a particular construction/rehabilitation activity will be based on the information provided in the environmental and social screening form (Annex 1). The constructor monitor, the NEA Regional Officer and the PCU environmental and social safeguards consultant did the screening of the site and the consultation with affected communities to verify the voluntary land donation. The social consultant will note measures that may be needed to address risks and impacts to vulnerable individuals and groups.

After finalizing this screening process, it was concluded that school sites have no major environmental and/or social challenges which will need the development of an ESIA or RAP. Given also similarities in almost all sites, it was suggested by the environmental and social safeguards consultant that one single C-ESMP can be developed to cover all sites and intervention.

Step 3: Carrying out Environmental and Social Work

After analyzing the data contained in the environmental and social screening form and after having identified the right environmental category and thus the scope of the environmental work required,

the ESFP will make a recommendation to establish whether: (a) no environmental work will be required; (b) the implementation of simple mitigation measures will be enough; or (c) a separate environmental impact assessment EIA will be carried out. In the latter the proposed EIA will have to be approved by the NEA,

According to the results of the screening process, the following environmental work can be carried out:

(a) Application of simple mitigation measures. Activities categorized as simple category B activities might benefit from the application of simple mitigation measures outlined in the Environmental and Social Screening Checklist (ESSC). In situations where the screening process identifies the need for land acquisition, qualified service providers would prepare a RAP, consistent with OP 4.12.

(b) Carrying out Environmental impact assessment (EIA): In some cases, the results of the environmental and social screening process may indicate that the activities scheduled are more complex and they consequently require conducting a separate EIA. The EIA will be conducted by consultants authorized/agreed by the PCU and the NEA.

The EIA will identify and assess the potential environmental impacts for the planned construction/rehabilitation activities, assess the alternatives solutions and design the mitigation, management, and monitoring measures to be proposed. These measures will be quoted in the Environmental and Social Management Plan (ESMP) that will be prepared as part of the EIA for each activity. The preparation of the EIA and the ESMP will be done in collaboration with the concerned parties, including the people likely to be affected. The EIA will be carried in accordance with the national Environment regulations and in consonance with the provisions of OP 4.01.

The draft EIA terms of reference have been provided in Annex 6 of the ESMF which can be adapted, as necessary.

Step 4: Review and Approval

Review: At the regional level, the Director together the CM, the Regional Program Officer (NEA) in the Region shall review the environmental and social screening forms as well as the EIA reports, and will make recommendations as to whether the results of the screening process or the EIA reports are acceptable. This structure at the regional level will review:

the results and recommendations presented in the environmental and social screening forms, the propose mitigation measures presented in the environmental and social checklists and, as appropriate, the results of EIAs to ensure that all environmental and social impacts have been identified and effective mitigation measures have been proposed and incorporated into the project implementation and costs.

The findings of the regional level will be conveyed to the ESFP in the PCU.

Recommendation for Approval/Rejection: Based on the results of the above review process, the ESFP will make recommendations to the NEA for approval/rejection of the review results and the proposed mitigation measures.

Approval/Disapproval: The EIA reports will have to be reviewed in the light of the ESFP recommendations prior to approve/rejection by the NEA. If the EIA is approved, the NEA issues the necessary environmental permit that confirms the EIA has been satisfactorily completed and the

project may proceed. A decision is made, and a record of the decision explains how environmental issues were taken into consideration.

Stage 5: Public Consultations and Disclosure

Public consultations have been performed to verify the voluntary land donation process and ascertain that those who are giving their land to MoBSE will not be negatively affected in terms of losing their livelihoods. Consultations will be undertaken by the environmental and social safeguards consultant, the Construction Monitor and the NEA Regional Officer.

In the preparation of this ESMF, community meetings were organized with local authorities, the concerned communities and their organizations to present this project to the community and solicit their feedback. A list of those consulted is included in Annex 5a and 5b.

A record of the discussions with the communities have been prepared and such records include the summary of the points raised in respect of their concerns, appreciations, and suggestions on the project. Minutes of consultation are attached in Annexes 6a and 6b.

For the education project infrastructure activities, the public consultation process will be carried out throughout the project life particularly: (i) during the screening and classification of project activities and (ii) during C-ESMP study and implementation.

Stage 6: Environmental and Social Monitoring and Follow-up

Environmental and Social monitoring aims at checking the effectiveness and relevance of the implementation of the proposed mitigation measures. In coordination with the Project Coordination Unit, monitoring will be done at communal, regional, and national level.

Regional level

At the regional level, the Construction Monitors will monitor the construction activities on a monthly basis. The reports of these monthly visits shall be submitted to the Environmental and Social Specialists at the PCU and the NEA Regional Officer. The E&S specialists shall also carry out, at minimum, monthly visits to project sites to ensure that the recommended mitigation measures are implemented. Quarterly visits shall be conducted with the Regional Programme Officer of the NEA in the region.

National Level

There will be nationwide biannual supervision visit by NEA to all the regions where the project is being implemented. This NEA biannual supervision will be coordinated by the Environmental and Social Specialists of the MoBSE PCU.

With specific reference to the water points, the Department of Water Resources (DWR) shall ensure that the contractual safeguards clauses are implemented by the contractors.

The monitoring to be carried out by NEA and DWR will be the subject of a memorandum of understanding (MOU) between the MoBSE and those agencies. One already exists which will need to be reviewed and updated. The option of a private firm for monitoring the water points is retained then a service contract will have to be prepared between the PCU and the firm concerned.

ESMP for sub-project components

Once the screening is completed and the negative environment and social impacts can be adequately addressed in the Guidelines for Civil works contractors then the Environmental and Social Specialist of the PCU shall include it in their monitoring program. However, given the relatively minor environmental and social impacts identified and similarities between all work sites, the Environmental and Social Safeguards Consultants of the PCU has developed a single Contractor Environmental and Social Management Plan for all sites which has been reviewed by the World Bank (see Annex 2).

The C-ESMP will include a Grievance Mechanism with procedures for the ethical and confidential management of cases related to GBV, including SEA, SH, and VAC, and a SEA/SH Prevention and Response Action Plan, which will incorporate appropriate risk mitigation measures, such as an accountability and response framework to include worker codes of conduct and related trainings and sensitization, the adapted GM and appropriate response protocol, as well as related awareness-raising in project-affected communities. The construction activities carry SEA/SH risk given contractor workers will be living with the affected communities even though in each site ten workers will be stationed and six to seven people will come from the communities. The contractor will build temporary accommodation in each school site or in the nearby lodge in order to host workers coming from outside the affected communities to mitigate risk of COVID-19 spreading or the risk of SEA/SH.

7 - ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

7.1 Environmental and Social Management Plan for the Implementation of GESSP Infrastructural Activities

At the time of the implementation of some of the activities of the infrastructure component, the potential environmental and social impacts must be clearly identified, and a management plan formulated and implemented. The plan's performance must be monitored before, during and after construction or rehabilitation of the works. The impacts must be avoided or neutralized where possible or mitigated in conformity with Gambia's and World Bank prescriptions.

An Environmental and Social Management Plan (ESMP) for the GESSP is intended to ensure efficient environmental management of these construction activities. The ESMP will include:

- a) the potential negative environmental and social impacts;
- b) the proposed mitigating measures;
- c) those who will be responsible for implementing the mitigation measures;
- d) those who will monitor the implementation of the mitigation measures;
- e) the frequency of the afore-mentioned measures;
- f) capacity building needs; and
- g) the cost estimates for these activities.

The ESMF and the C-ESMP will be included in the project documents including the Project Implementation Manual (PIM) with the associated costs.

7.2 ESMF Implementation and Monitoring Arrangements

7.2.1 Roles and Responsibilities for ESMF Implementation

Implementation of this ESMF is the overall responsibility of PCU. However, mitigation measures with respect to civil works activities will be the responsibility of the contractor, and the PCU will monitor

and supervise. The PCU will also be responsible for other social mitigation measures not covered and monitored by the contractor to ensure compliance with the ESMF.

The MoBSE PCU will be responsible for overall follow-up, and to ensure that the ESMP is fully implemented with the support of the PCU Environmental Safeguards Specialist (ESS) and Social Safeguards Specialists (SSS). Specifically, the MoBSE PCU will include clauses in the Contractor's agreements that will ensure compliance, and coordination with the GM, among others.

Communities will also have the responsibility of ensuring that school communities (teachers, children, mothers' clubs, school development committees, Food Distribution Committees) avoid work sites and report to MoBSE or relevant authorities, issues of concern related to the Project; the PCU and Contractor will engage the community regularly as an oversight measure in this regard, and conduct sensitization sessions to ensure communities are aware of reporting measures and understand Project risks.

As the Secretariat of the EIA Working Group¹¹, and supported by its members, NEA will be responsible for the overall external monitoring of the ESMP implementation. In collaboration with the PCU ESS and SSS, they will monitor compliance with the World Bank policies as they relate to the environmental and social aspects of this Project. In addition to the permanent members in the EIA Working Group, other institutions on an *ad hoc* basis will include those specialized in social aspects such as the Women's Bureau, Department of Social Welfare, Department of Labor, and Department of Health Services, amongst others. Meanwhile, monitoring of the implementation of the social aspects of the Project in line with the World Bank's safeguards instruments will be the responsibility of the PCU SSS.

The Local Authorities and beneficiary community members will be relevant during the project cycle, as they can provide valuable information to assist in the planning of the works.

The breakdown of the institutional arrangement for the ESMP implementation is as follows:

a) MoBSE Projects Coordination Unit (PCU)

The MoBSE and PCU staff that will be involved in the implementation of the ESMP will include the following, among others:

- Project Manager
- Deputy Project Manager
- Environmental Safeguards Specialist (ESS)
- Social Safeguards Specialist (SSS)
- Procurement Officer
- Construction Program Manager
- Quantity Surveyor
- Financial Controller
- PEO Monitoring and Evaluation Officer MoBSE

¹¹ The EIA Working Group is one of nine multisector technical groups located at NEA. Nationally, NEA is the custodian of the ESIA process, and is supported by a multisector EIA Working Group which comprises the public sector, private sector and civil society, and at the Regional level, it is represented by the EIA/ANR (Agriculture and Natural Resources) Working Group sub committees of the Technical Advisory Committees (TAC). A major responsibility of the EIA Working Group (whether at central or regional level), is to provide support to the NEA in assuring the quality and integrity of the EIA process. Specifically, the EIA Working Group fulfils the following functions:

- Provides expert advice on the EIA process and review impact statements and ESMPs upon receiving requests;
- Approves impact statements and ESMPs;
- Conducts periodical environmental audits; and
- Ensures that public consultations as part of the EIA process are done.

- Regional Education Directors
- MoBSE Gender Unit
- MoBSE Special Needs Unit

The PCU will oversee the implementation of this Project, including the C-ESMP. Its other responsibilities will include:

- Ensuring alignment of the environmental and social safeguards standards applied to the Project
- Working with the procurement teams to ensure that contract documents contain environmental and social safeguard clauses that Contractors must fully implement, including provisions related to mitigation of SEA/SH risk
- Coordinating internal monitoring and evaluation of the C-ESMP based on monitoring plans
- Coordinating Project-related grievance redress activities, including GM procedures for the management of SEA/SH-related claims
- Where applicable, facilitating Project related activities of partner stakeholders

b) National Environment Agency

The NEA will be responsible for overall monitoring of the implementation of only environmental aspects of the ESMP, particularly the environmental component. According to Section 31 of the EIA Regulations 2014, NEA will monitor routinely to guide and audit the progress of the environmental aspects of the ESMP implementation to ensure compliance with both national laws and the policies of the Bank. In this project, NEA's responsibility is to monitor the environmental components in collaboration with the PCU environmental and social specialists, to ensure compliance with national regulations and the Bank's policies. The monitoring visits should be once quarterly, to provide technical advice and support in project implementation. However, due to lack of capacity on monitoring social aspects in the ESMP, the PCU will be responsible for overseeing adherence to social mitigation measures in the ESMP, including measures related to SEA/SH risk.

c) Specific Roles and Responsibilities of Project Personnel

i) Project Manager (PM)

The PM will oversee the implementation of the Project, and consequently the ESMF, and will have the responsibility for ensuring that implementation of the ESMP is carried out as required under the national law and the World Bank's Procedures.

ii) Environmental Specialist (ES)

The ES is responsible for validating the ESMF and obtaining the environmental compliance certificate and publishing the ESMF. The ESS will make sure that all environmental measures outlined in the ESMF are integrated in the bidding documents and in the companies' contracts. She will also be responsible for the approval of the contractor's 'ESMP.

The ES will provide day-to-day management of all environmental issues and activities including the implementation of the ESMF, in collaboration with NEA. He will prepare progress reports for submission to the PCU for transmission to the PM, MoBSE, the World Bank. She will also directly oversee the implementation of the capacity building of stakeholders on environmental and social safeguards.

iii) Social Specialist (SS)

The SS will make sure that all social measures outlined in the ESMF are integrated in the bidding documents and in the companies' contracts, including those related to SEA/SH risk mitigation. S/He will provide day-to-day management for all social issues as they relate to implementation of any resettlement issues, labor, and social inclusion, including in relation to SEA/SH risk; prepare periodic reports on progress on social issues.

These reports will be submitted to the PCU for transmission to the MoBSE and the World Bank. The SS will directly oversee the implementation of the capacity-building of stakeholders on the GM and the implementation of all risk mitigation measures under the project's SEA/SH Prevention and Response Action Plan, including codes of conduct that address GBV, including SEA/SH and VAC, appropriate GM procedures and associated response protocol, and related trainings and awareness-raising activities.

The Social Specialist will have a background on gender and/or GBV prevention and response programming in order to assure a basic understanding of SEA/SH risk and the related mitigation measures to be put into place.

Table 7.1 Summary of Roles and Responsibilities in ESMF Implementation

No.	Steps/Activities	Responsible	Collaborating Partners	Service Provider
Preparation of the Project activities documents etc. in accordance with the national legislation/procedure and the World Bank's policy guidelines				
1	Report validation and issuance of the permit (when required)	ES/SS; PM	NEA	PCU
	Disclosure of the document	ES/SS; PM	ES/SS; NEA	Consultant; World Bank
		ES/SS	NEA; MoBSE	MoBSE and the PCU; also disclosed on the World Bank's external website
2.	(i) Integrating the mitigation measures of the planned activities and E&S clauses in the bidding document prior to being advertised, including provisions related to SEA/SH (ii) ensuring that the contractor integrates relevant ESMP measures in	ESS/SSS; PM	ES/SS; MoBSE, PCU, PM; Contractor	Contractor; NEA

	the activities, including those related to SEA/SH			
3.	Implementation of the other safeguards' measures, including environmental and social monitoring (when relevant) and sensitization activities, taking into account SEA/SH risk	ES/SS	NEA and EIA Working Group; PCU; General public	Consultants; Other relevant public institutions
4.	Oversight of safeguards implementation (internal)	ES/SS/PM	PCU;	MoBSE PS and Management
	Reporting on project safeguards performance and disclosure	PM	ES, SS;	MoBSE PS and Management
	External oversight of the project safeguards compliance and performance	EIA Working Group/NEA	PM; ES; SS; PCU	MoBSE PS and Management
5.	Building stakeholders' capacity in safeguards management	ESS	PM; SS; NEA	Consultant Other qualified public institutions

7.2.2 Institutional Training and Sensitization

Since the beginning of Project implementation, it became evident that there is need for all the stakeholders to be trained in the management of environmental and social risks. This management will also include training on risk mitigation, prevention, and response related to GBV, including SEA/SH and VAC. The training will help strengthen the capacity of stakeholders, especially the MoBSE staff (including the ES, SS, etc.). The estimated cost is US\$ 30,000 (same amount planned for the COVID-19 Project because it is the same PCU).

The discussions also showed the need to sensitize the stakeholders, especially in the rural areas on COVID-19 and the guidelines in place to reduce transmission. At the level of the schools, the teachers and other staff that will be implementing the Protocols for the prevention/reduction of the spread of COVID-19 will also need to be trained.

Public sensitization on the Project will be carried out to prevent complaints and conflicts, and to highlight community roles in promoting issues related to public health and safety, including regarding mitigation of SEA/SH and VAC risk, at an estimated budget of \$US 2,000 per Region (**Total, \$US 10,000**).

Table 7.2: Capacity Enhancement Program for Effective ESMF Implementation

No	Identified Activity	Expected Output	Target Beneficiary	Budget (US \$)
Institutional Capacity – Technical skills development and awareness creation				
1	Workshops and meetings to strengthen the human resource capacity of the stakeholders	<ul style="list-style-type: none"> • Project components and related activities known • Capacity enhanced in ESIA Procedures • ESMP requirements understood • Roles and responsibilities of stakeholders with regard to the ESMP understood • Plan for enforcement of the C-ESMP developed • Stakeholder skills in GBV/SEA/SH and VAC risk mitigation, prevention, and response strengthened • reviewing WHO/Government of Gambia guidelines, on COVID-19 and provision of masks, sanitizer, etc. 	MoBSE stakeholders	(5,000 x 6) = 30,000
2	Capacity building of relevant MOBSE staff	<ul style="list-style-type: none"> • Environment and Social risk management issues are understood, including risk related to SEA/SH and VAC • Roles and responsibilities of MoBSE PCU staff in implementing the C-ESMP understood • Risks and method of propagation of COVID-19 understood and the measures to reduce its spread and provision of masks, hand sanitizers and enforcement of social distancing and other measures imposed by the Government of The Gambia through the State of Emergency 	MoBSE Senior Management Team and other relevant technical officers	20,000
Public Sensitization - Education, communication, and information provision				
3	Public sensitization to raise awareness on the Project (such as project	Increased community understanding and participation on environmental and social	General public, specifically	(2,000 x 6) = 12,000

	risks and benefits, developments, progress, GBV/SEA/SH, VAC and GM procedures, etc.) through relevant radio and TV programs and public meetings as appropriate	aspects related to the Project, including SEA/SH and VAC risk; increased understanding of COVID-19 risk and how to mitigate it	communities where the Project will be implemented	
TOTAL				62,000

7.2.3 Monitoring

Once the Project commences, including implementation of accompanying mitigation measures, monitoring must be carried out by the different stakeholders to ensure effectiveness in maintaining environmental and social sustainability. Monitoring will act as an oversight mechanism to ensure that the mitigation measures are enforced. The monitoring will include activities that have been identified above which have potential negative impacts on the environment and socio-economic parameters, and for which the corresponding mitigation actions have been developed. Routine monitoring may also identify new issues that have arisen due to changes (at the sites, or in Project design or activities) that will need alternative mitigation measures. Thus, appropriate mitigation will be developed accordingly.

Internal monitoring will be the responsibility of the Environmental Specialist and Social Specialist within the PCU to ensure compliance with national laws and procedures and the World Bank's safeguards policies. With regard to COVID-19, they will also monitor to ensure that WHO and national guidelines are followed and updated accordingly, and practices revised as the situation evolves. Any monitoring related to SEA/SH and VAC risk and complaints must adhere to international best practices and norms regarding the confidential management of SEA/SH case and survivor data.¹² And also about increased understanding about the COVID-19 spreading and mitigation measures.

The recommended arrangements and roles for implementing the ESMF will also be evaluated for completeness, and improvements suggested where necessary.

The NEA and other relevant institutions identified in the ESMF will monitor compliance with requirements under Gambian law. Selected relevant Technical Advisory Committees members for example (including the representatives of NEA and MoBSE who will provide leadership and technical support respectively) will conduct monitoring visits to the Project sites. Technical Advisory Committees members whose sectoral expertise will not be useful, nor add value to the process, will not be included in the TAC monitoring team. This arrangement will ease coordination and lower expense on resources. Furthermore, it will be more cost-effective and focused to use the regional TACs than displace members of the national EIA Working Group (in the Greater Banjul Area) to monitor Project activities in the respective Regions where the Project will be implemented. The regional TACs are also supposed to be more familiar with the local terrain and communities.

NEA's representative in the TACs will forward the monitoring reports to the NEA Headquarters for eventual transmission to the PCU.

A monitoring plan with frequency and indicators is further outlined in Table 7.3, and an estimate for the cost of mitigation has also been provided in the below table.

¹² WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies (2007); GBVIMS Best Practices <http://www.gbvims.com/wp/wp-content/uploads/BestPractices2.pdf>.

Table 7.3: ESMP Monitoring Program

	Mitigation outputs to be monitored	Responsibility for mitigation	Monitoring Responsibility	Time to monitor	Monitoring frequency	Monitoring indicators
1	Mitigation of SEA/SH and VAC risk	MoBSE PCU	SSS with support from the Women's Bureau and Department of Social Welfare	Before & during project implementation	Quarterly	<ul style="list-style-type: none"> • No. of worker sensitization meetings on codes of conduct prohibiting SEA/SH and VAC • % of workers and project personnel who signed codes of conduct prohibiting SEA/SH and VAC • % of workers trained on SEA/SH and VAC, codes of conduct, and GM complaint procedures • % of workers trained who score above 70% on post-test • No. of independent consultations with women in safe and enabling environments (with same-sex facilitators) and number of women participants • No. of community sensitization meetings where GBV/SEA/SH and VAC risk and discrimination are discussed, including GM complaint procedures and response to SEA/SH complaints • Number and type of complaints through the GM, including SEA/SH and VAC (there should be no

						<p>target for SEA/SH and VAC complaints)</p> <ul style="list-style-type: none"> • % of SEA/SH and VAC complaints referred for support services • % of SEA/SH and VAC complaints resolved within the prescribed delay under the GM • % of SEA/SH and VAC complaints resolved outside of the prescribed delay under the GM • Average time period for resolving SEA/SH and VAC complaints • Number and type of complaints relating to discrimination and exclusions from benefits and inequality (for example based on vulnerability such as sex, age, etc.) • Number of women hired in the Project and in which type of roles
2	Mitigation against the transmission of COVID-19	MOBSE-PCU/ Contractor	SS with support from the Ministry of Health	Before and during project implementation	Quarterly	<ul style="list-style-type: none"> • No. of sensitization meetings/programs of mother's clubs, school management communities, staff, teachers, and education personnel on mitigating the spread of COVID-19 • No. of public sensitization meetings and programs on WHO and national guidelines on the prevention of the spread of COVID-19 • Number of cases of COVID-19 registered among workers and members in

						communities around the schools
3	Women and youth considered	Contractor/ MOBSE PCU	PCU SS	Before and during works	One time before work and after activities start	<ul style="list-style-type: none"> • No. of independent consultations with women in safe and enabling environments (with same-sex facilitators) and number of women participants • No. of youth participating in consultations (male and female) • No. of youth employed by the Project (male and female)
		MOBSE/PCU	PCU –SSS/M&E	Throughout project implementation	Quarterly	<ul style="list-style-type: none"> • No. of female teachers recruited and trained
4	Protection from Violence Against Children	Contractor / MoBSE PCU	PCU SS	Before and during project	Quarterly	<ul style="list-style-type: none"> • No. of reports of child labor / abuse • No. of women participating in consultations • No. of Community sensitization meetings where VAC issues are discussed • No. of meetings on GM • Reports on progress in enforcement of Codes of conduct to address VAC. • No. of reports of children involved in Project related accidents
5	Public and worker health and safety	Contractor	ES/SS/NEA Beneficiaries	Before starting of activities	Quarterly	<ul style="list-style-type: none"> • No. of accidents related to the Project activities • No. of health education / sensitization sessions, including on SEA/SH and VAC risk

						<ul style="list-style-type: none"> • No. of complaints /reports on lack of measures to address air polluting emissions • No. of protective gear provided to workers
6	Proper waste management	Contractor	ESS/SSS/NEA	During activities implementation	Quarterly	<ul style="list-style-type: none"> • No. of waste dumps on and around sites • No. of sensitization meetings on waste management • No. of contracts that included waste management clauses • Waste management plans developed • No. of reports/complaints on waste management issues
7	Employ local labor	Contractor/ MoBSE PCU	ESS/SSS/NEA/Labor Department	Before and during activities implementation	Annually	<ul style="list-style-type: none"> • No. of people employed from the local communities • No. of contracts that specify use of local labor
8	Consultation and participation of beneficiaries	Contractor/ MoBSE PCU	NEA/ESS/SSS	Before and during works	Annually	<ul style="list-style-type: none"> • No. of consultative meetings with beneficiaries • No. of independent consultations with women in safe and enabling environments (with same-sex facilitators) and number of women participants • No. of complaints on lack of consultation • No. of minutes /reports of consultations • No. of persons in attendance
9	Social cohesion	MoBSE PCU / community	NEA/PIU	Before and during works	Quarterly	<ul style="list-style-type: none"> • No. of locals employed • No. of community conflicts

7.2.4 Reporting

As monitoring of the ESMF implementation falls under the general monitoring and evaluation system of the Project, its reporting should be synchronized. This will ensure efficient reporting and communication of the ESMF related issues to all relevant stakeholders for holistic management, particularly where changes for improvement are recommended.

It is recommended that, after their quarterly monitoring activities, NEA submit monitoring reports to MoBSE (through PCU) on its monitoring of the ESMF implementation. NEA will work with its Regional Environment Officers in each region to ensure issues reported by the PCU Environmental and Social specialists and Technical Advisory Committees are incorporated and follow-up actions by the various affected institutions and stakeholders coordinated accordingly.

Where incidents or accidents occur that require immediate action, NEA shall report to E&S specialists of MoBSE PCU immediately, and MoBSE should in turn notify the World Bank as soon as possible.

The PCU, according to its work plan, shall submit all monthly and quarterly reports to the NEA and World Bank for consideration.

7.2.5 Environmental and Social Auditing

According to Part VI of the EIA Regulations, 2014, environmental audits should be carried out by the Project and the NEA. A systematic environmental and social audit shall evaluate predictions made during the ESMP study and the level of implementation of proposed mitigation measures. The audit may also identify potential impacts that have arisen due to any modification in planned design or activities, or changes to environmental and social parameters.

The Project may carry out self-audit by the Environmental and Social specialists to include review of its activities, the Project ESMF implementation, monitoring reports and any subsequent improvement measure, capacity, and communication between the affected stakeholders amongst others.

Whilst the self-audit is a routine activity of the PCU E&S specialists, an independent environmental and social audit will be carried out midway during implementation of the ESMP and upon project completion, preferably by an external auditor to avoid conflict of interest.

Environmental Inspectors of the NEA are also empowered to carry out audits in their own time, with the aim of confirming that all mitigation measures are complied with, and any breach pursued for appropriate redress.

7.2.6 Budget for Implementation of the ESMF

The proposed budget for implementation of the ESMF is US\$ 58,000 as indicated in Table 7.4.

Table 7.4: Estimated Budget to Implement the ESMF

No.	Activity	Time Frame	Budget (US\$)	Responsibility to coordinate
1	Capacity Building			
	Workshops and meetings to strengthen the capacity of the Regional TACs in managing issues regarding environmental and social safeguards on ESIA, including on SEA/SH	First quarter of the Project implementation	5,000	NEA/PCU/ESS/SSS
	Capacity building of relevant MoBSE staff on environmental and social safeguards and their roles, including responsibility for SEA/SH risk	Annually during project implementation	10,000	MoBSE Management / PCU
	Public sensitization to raise awareness on the Project issues like COVID-19 risks and mitigation measures through relevant radio / TV programs and meetings	First and second quarter of the project implementation	10,000	NEA/PCU/ESS/SSS Ministry of Health
2	ESMP Implementation, Monitoring, Evaluation and Reporting			
	Implementation of the mitigation measures, including SEA/SH	Annually during all phases	5,000	PCU
	Regular environmental and social monitoring of the implementation of mitigation measures and the activities, including for SEA/SH	Project implementation period	5, 000	NEA/PCU
	Audit of environmental and social measures	During and after construction	5,000	PCU/NEA/Consultant
	Acquisition of masks and hand washing detergents for schools to prevent spreading of COVID-19	Throughout project implementation period.	5,000	PCU
3	Operation of the GM			
	Field investigations/visits	Project implementation period	5,000	GRC
	Implementation of GM related to activities and mitigation measures, including procedures for ethical and confidential management of SEA/SH and VAC claims	Annually during all phases	10,000 (pa)	NEA/PCU
4	Personal protection equipment (PPE)- sanitizers, masks etc. for public consultations, trainings, and site visits		<u>3,000</u>	PCU

No.	Activity	Time Frame	Budget (US\$)	Responsibility to coordinate
5	Monitoring and evaluation of the environmental and social impacts of the project at community, regional and national level		<u>75,000</u>	PCU
6	External evaluation		<u>20,000</u>	PCU/Consultant
Total			<u>153,000 USD</u>	

8. GRIEVANCE MECHANISM PROCESS

PURPOSE

A grievance mechanism is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely fashion and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties with redress and helps address issues at an early stage.

To respond to concerns and grievances of project-affected parties (PAPs) related to the environmental and social performance of the project, the following grievance mechanism is proposed to receive and facilitate resolution of such concerns and grievances. However, the grievance mechanism for project workers will be provided separately, and the project grievance mechanism will likewise be adapted to incorporate specific procedures to manage SEA/SH complaints ethically and confidentially, accompanied by an appropriate response protocol.

It is anticipated that some of these concerns may include eligibility criteria for project opportunities, loss of livelihood or properties and use of land. The mechanism for handling grievances shall thus include:

- Provision for the establishment of a grievance redress committee (see GRC members below, section 3)
- Multiple grievance uptake locations and multiple channels for receiving grievances to enhance accessibility and inclusion, especially for those who are disadvantaged and marginalized
- Fixed service standards for grievance resolution, include adjudication process and process of handling situations related to gender-based violence/sexual exploitation and abuse
- Prompt and clear processing guidelines (including reviewing procedures and monitoring system)
- A time frame for responding to grievances
- A reliable, accurate and effective reporting and recording system
- Procedure for assessing the grievance
- Grievance escalation model

The Grievance Mechanism is designed with the objective of solving disputes at the earliest possible time before they escalate. Project affected persons should be heard and be able to voice concerns, and as such, they must have access to a fair, transparent and accessible means to address their concerns and views related to the project. Furthermore, the mechanism should be effective in addressing projects complaints and concerns at project-level so that grievances are not referred through the court system for resolution which is often not timely nor financially feasible or accessible

to all. A functioning, inclusive and accessible grievance mechanism is essential for social sustainability of the project.

1- RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

- **Human Resources and Implementation**

The MOBSE PIU will appoint community liaison officers (CLO), **the future Social and environmental Safeguard Officers**, to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise. The two CLOs will act as key points of contact to bring project grievances from PAPs, stakeholders, construction workers, residents, and community members to the Grievance Redress Committee (GRC). The CLOs will be responsible for making sure the recommendations of the GRC are implemented through all phases of the project and direct contractors to make any appropriate adjustments to their works. The contractor shall take actions to address grievances. The Regional Construction Monitor, Mamudou Ceesay, will assist them because he, personally, knows the area and communities very well and speaks all local languages.

- **Management Functions and Responsibilities**

During the implementation phase of the Project, the grievance redress mechanism shall include:

- Establishing a Grievance Redress Committee (GRC). MOBSE will determine a sitting allowance for GRC members
- Multiple grievance uptake locations and multiple channels for receiving grievances (for example: MOBSE PIU office, MOBSE Regional Office in CRR, Alkalo, Mother's Clubs, and VDC houses in affected villages)
- Fixed service standards (transparency, fairness, accountability, timeliness) for grievance resolution and adjudication process
- Prompt and clear processing guidelines: including reviewing procedures and monitoring system (see flow chart on GM chapter)
- A time frame for responding to grievances (see flow chart on GM chapter)
- A reliable and effective reporting and recording system (grievance register, complaints logbook – both hard copy and e-copy) – See Annex 12.
- A clear and transparent procedure for assessing and responding to the grievance
- Capacity building of both actors working in the GM and among contractors and community of how the GM works
- Development of specific and separate survivor-centered GM procedures for the ethical and confidential management and resolution of GBV/SEA/VAC complaints

2- ROLES AND RESPONSIBILITIES

- a. **The Grievances Redress Committee (GRC)**¹³ will be responsible for receiving and resolving complaints in a fair, objective, accountable, effectively, timely and accountable manner in all phases of the project lifecycle.

¹³ The membership of the GRC is in section 5 Project Level Grievance Mechanism.

The broad responsibilities of the GRC with the assistance from MOBSE Gender Unit (Gender Unit scope of work and mandate description include:

- Developing and publicizing the grievance management procedures
 - Receiving, reviewing, investigating, and keeping track of grievances
 - Adjudicating grievances
 - Monitoring and evaluating the fulfillment of agreements achieved through the grievance redress mechanism.
- b. **Community liaison officers (CLO):** MOBSE PIU will appoint as community liaison officers (CLO) *an environmental and a Social Safeguards Officers*. After their hiring, their contact information will be published and communicated via public announcements and information sharing about the project, (radio, mosques and community meeting etc.), to conduct stakeholder outreach during project implementation and respond to any grievances or complaints that may arise. The CLOs will act as the point of contact to bring project grievances from project affected people, construction workers, residents, and community members to the GRC. The CLOs will be responsible for making sure the recommendations of the GRC are implemented and directing MOBSE PIU during ESMP implementation, and contractors to make any appropriate adjustments to their works. The contractor shall take actions to address grievances.

In addition to the community liaison officer, the project will make available grievance forms in every village (Alkalo, Mother's Club or VDC) as an accessible venue for filing a grievance. At least, every end of month or every two weeks, Community liaison officers will collect forms filled out to submit them to the GRC.

For those with low literacy levels, Mamudou Ceesay Construction Monitor will assist community liaison officers (the Social and environmental Safeguards Officers) or the VDC of where the person resides will assist them to write and submit complaints. To ensure confidentiality, the Project will enforce the implementation of the World Bank Codes of Conduct which will be filled out by the Projects' staff prior to the starting of the Civil Works. The Project will issue a code of conduct form to fill out by the Projects' staff, VDC, Alkalo, Mother's Club and liaison officers based on the World Bank Codes of Conduct. The PIU safeguards team will monitor closely the implementation of the codes of conduct by the Contractor and the Project.

- c. **The contractor:** During the implementation, contractors, their staff and all workers related with the Project must be in compliance with the World Bank standards on Environmental, Social, Health and Safety (ESHS) and Occupational Health and Safety (OHS) in the workplace and conduct with affected communities. The application of these Codes of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV, including SEA/SH and VAC. The Project and Contractors should make sure these Codes of Conduct are signed, behaviors monitored, and adopted by those working on the project.

The contractors are responsible for:

- creating awareness of the ESHS and OHS expectations on the project
- creating common awareness about GBV, SEA and VAC and ensure a shared understanding that they have no place in the project; and, create a clear system for identifying, responding to, and sanctioning GBV, SEA and VAC incidents as per the GM

Three codes of conduct are set for strict use and follow (see Annex 11 for more details):

- i. **Company Code of Conduct:** Commits the company to addressing GBV and VAC issues;

- ii. **Manager's Code of Conduct:** Commits managers to implementing the Company Code of Conduct, as well as those signed by individuals; and,
- iii. **Individual Code of Conduct:** Code of Conduct for everyone working on the project, including managers and MOBSE staff.

These codes of conduct will be explained and displayed in the work sites, workers and affected communities will be sensitized prior to works start and during all the Project implementation life *Sensitization campaigns on the GM and Codes of Conduct shall be conducted every six months for the affected community and every month for workers. These will be monitored to ensure compliance.* Every new worker will receive a training on the GM and Codes of Conduct before he or she starts working. The contractor liaison officer will work closely with the Project Community Liaison Officers to bring to the GRC all complaints.

For sensitive claims regarding SEA/SH and VAC, specific procedures will be put into place under the project grievance mechanism and will include a response protocol to ensure timely referral for survivors to appropriate support services. Generally speaking, the project will put into place a separate structure to review and resolve SEA/SH-related claims in an ethical and confidential manner. This review structure may be comprised of specially trained members from the Grievance Redress Committee, the National Steering Committee, the MoBSE Gender Unit, the contractor if needed, as well as representatives of local or national NGOs specialized in GBV prevention and response, which may also include a service provider present to act as an advocate on behalf of the survivor. At all times, the procedures for resolution of SEA/SH-related claims will follow a survivor-centred approach and assure the anonymity of the survivor and alleged aggressor. In addition, with the survivor's express consent, he or she will be informed of available options, such as receiving psychosocial support, medical assistance, and other services as required. Where needed, the contractor must also ensure that it has a trained focal point in place to refer SEA/SH cases for appropriate support and review and to ensure that workers receive necessary information about SEA/SH prevention and response, including prohibited behaviours and the contractor's grievance mechanism. SEA/SH-related cases brought through the project GM will be documented separately, and related documentation will be kept in a confidential and locked storage space with limited access. Specific training on how to handle SEA/SH or VAC claims will be provided by an external consultant or provider.

The key objectives of the GM are:

- Record, categorize and prioritize the grievances according to severity and immediacy of the issue, and provide timely, fair, accountable resolution to grievances at the project level
- Settle the grievances via consultation with all stakeholders (and inform stakeholders of the solutions, obtain their views on the outcome, and ensure they understand possible next steps to escalate if they are not satisfied with the outcome)
- Forward any unresolved cases to the relevant authority
- Regularly analyze grievances to assess if there are systemic issues in the project that should be addressed to mitigate the same types of issues being reported.

The GM operates within the existing legal, cultural and community context framework of The Gambia. It will also take into consideration World Bank procedures and recommendations regarding complaint handling.

The details of each level of Grievance Mechanism are described as follows.

3- COMMUNITY LEVEL GRIEVANCE MECHANISM

Local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the Project, contractor(s), and/or Government representatives at local and national level. The extended family, village and/or chiefs may be involved at this level. This may be more suitable for issues and concerns that are minor. For example, community processes were used to determine voluntary land donation as communities discussed among themselves to find suitable land for a school and then proposed the sites to MOBSE to survey before final approval.

Another example is if the contractor needs to recruit housekeepers or other human resource needs, he or she can choose among the resumes collected by the community. We have seen during the consultation that in some villages, priority has been already given by the community to families who gave land for the school of their village as was agreed by them. The community and contractor will be informed that the principle of non-discrimination and fairness, including gender equality, as per the Gambian Labour Law will apply in the selection. Also, if the company want to compensate the community for using their sand, gravel or because of the impact of its activity (dust dispersion), those grievances can be solved at the community level, without the GRC, if the community chooses.

4- PROJECT-LEVEL GRIEVANCE MECHANISM

Many project-related grievances during the works are minor and site-specific. Often, they revolve around nuisances generated during construction such as noise, dust, vibration, workers disputes, etc. They can be resolved easily on site. If these types of grievances can't be resolved on site, they will request the intervention of the Grievance Redress Committee, the Chief of the area, the Alkalo of the concerned village, the Governor's representative and the Project (GRC), landowner(s) concerned, and if required, the representative from the Ministry of Basic and Secondary Education and other ministries which can assist in solving the grievance.

Grievances which are complex or serious especially when it is about land boundaries, access to property, or misunderstandings between affected communities or households with the Project regarding compensation or impact in communities' lives or properties can be brought under the project-level GM.

Grievances and complaints related to GBV, including SEA, SH, VAC, as well as child labour, from workers, contractors, and/or community members during construction phase can be addressed by the specific procedures and protocols which will be integrated into the project-level GM and will ensure ethical and confidential management and resolution of these claims. Most grievances cannot be resolved immediately and on site, and in the case of SEA/SH-related claims, require specific and independent interventions and processes to protect the safety, anonymity, well-being, and preferences of survivors.

Given the lack of experience of the GRC regarding issues related to SEA/SH and VAC, the MoBSE Gender Unit will be part of the specific review structure for SEA/SH and VAC complaints, which may contain existing members of the GRC as well. The MOBSE Gender Unit will likewise support training and sensitization activities laid out under the SEA/SH Prevention and Response Action Plan.

5- COMPOSITION AND MEMBERSHIP OF THE GRC

Project Community Liaison Officers (the environmental and social safeguards officers) who are situated within MOBSE PIU will be designated to receive, review, record, and address project-related complaints. Every month the safeguards team (***the social and environmental safeguards officers***) will collect complaints to submit to the GRC. The GRC meets at least once per month, depending on the number and type of complaints received. All grievances, with the exception of SEA/SH claims which will be handled separately, will be logged regardless if they are found to have merit. The Alkalo, VDC and Contractor Liaison Officer will contact MOBSE PIU safeguards team in case a complaint is not resolved within one week after receiving the grievance. The PIU safeguards team will go to the field in order to obtain further information and resubmit the case to the GRC. The complainant will be notified

that further information is being collected and keep that person/persons informed about the status. The claimant will also be asked what they would like to see as a resolution in order to provide a timely response and if it is a remedy that can be implemented easily, the grievance can be resolved and the outcome logged in the grievance log, including the feedback from the claimant.

These complaints will be submitted to the Grievance Redress Committee, whose permanent members are as follows:

- Alieu Sarr, Rep of National Environmental Agency
- Social and Environmental safeguards officers
- Mamudou Ceasay Regional Monitoring Officer MOBSE
- Alieu Mbow Development Officer
- Kebbah Jobartey Physical Planning Regional Officer
- Pa Darboe Chief Executive Officer (Janjabureh Area Council)
- Samba Liegh Chief Executive Officer Kuntaur Area Council
- Anta Jobarteh Councilor Representative of the Women's Bureau (women)
- Abdoulie Sowe, GESSP Project Coordinator
- Madam Lawa Drammeh Representative Social Welfare
- Kumba Dansireh Mothers' Club Representative
- Retired Teacher, Tida Manga
- Tidda Jatta Jarjue MOBSE Gender Unit Director
- Paul K Mendy Regional Education Director and the Governor Office to serve as Secretary of this Grievance Redress Committee
- Samba Sey, CRR Governor Representative
-

The GRC will include a non-permanent member of the affected community. For example, if the complaint comes from Bush Town or Yoro Beri Kunda, the VDC or Alkalo or Imam and or the Mothers' Club representative of Bush Town will become non-permanent members during the GRC meeting to represent their community.

6- GM PROCEDURES

The community will be informed and sensitized about the use of and existence of the GM (through radio notices, communities, community signage, Imam and with some awareness trainings by the PIU and the contractor prior to the starting of the Civil Works) and of the various uptake options where complaints can be submitted (for example, to the Alkalo, VDC, Mother's Club, the MOBSE PIU office). The MOBSE future safeguards team will meet every month to review all complaints and inform the complainants within three days that complaints have been received and the procedures they must follow. The safeguards team will then organize a meeting for the GRC at the soonest to ensure compliance with the timeline for responses to complainants.

If the identity of the person who submitted a grievance is known, the GRC must inform them within three days of the decision or when a decision is to be expected. If it is a grievance that can be easily addressed (i.e. removing of debris from one's property), the matter can be handled swiftly and the outcome will be recorded. If the complainant is not known, a notice that a grievance about a particular issue has been received will be posted within the community and the CLO will inform the community. The date of this outreach is to be logged into the grievance log. The GRC will commit decisions to be finalized within two weeks of date of receipt and complainants will be notified and will record the complainants' comments about decision. If the complainant is not satisfied, they will be notified about **escalation procedures**.

As noted above, specific procedures will be put into place under the project GM to manage SEA/SH and VAC complaints ethically and confidentially, including the establishment of a review structure to

handle these complaints, and will include a response protocol to ensure timely referral for survivors to appropriate support services.

A) Notices and signage will be erected at all sites providing the public information on the Project and summarising the GM process, including contact details of the relevant Project Contact Person, Contractor Liaison Officer or Community Liaison Officer. The GM will be accessible to all persons through at multiple uptake locations and the methods (grievance forms submitted to the Project, in person, telephone) or via the contractor or VDC. All type of complainants should be free to lodge a complaint in one or as many of the uptake stations noted above.

B) A Complaints Register (see Annex 12) will be at the MOBSE PIU office and MOBSE Education Regional Direction in Central River Region, since the Project will be implemented in this region, VDC, Mother's Club, or Alkalo of each affected community will have complaint register and also the contractor. Community Liaison Officer of the contractor, and the CLOs of the PIU who will be trained will log the complaints:

1. details and nature of the complaint (include categorization of sensitive/urgent, non-sensitive)
2. the complainant name and their contact details if known
3. date the complaint was received
4. corrective actions taken in response to the complaint
5. the date the response was made available to the community (without identifying personal details) and the complainant
6. the resolution
7. the response of the complainant if response was acceptable to them or not
8. the name of the person who received the complaint and location/method the complaint was lodged. This information will be included in MOBSE PIU's progress reports to the World Bank (See Annex 12 for sample grievance log).

Every two weeks or end of month, the CLOs will monitor all uptake stations to monitor the complaints registered with VDC and Alkalos.

C) Escalation of Grievances

If the complaint is not resolved to the satisfaction of the aggrieved party by the Grievance Redress Committee, it will then be referred by the MOBSE PIU Project Coordinator to the **National Steering Committee (NSC)**.

The MOBSE GESSP National Steering Committee (NSC) is composed of:

The NSC will meet at least once per month and will be required to address the complaint within 10 days. Should measures taken by the National Steering Committee fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Gambia judicial court (District Tribunals or Magistrates Court).

7- JUDICIARY LEVEL GRIEVANCE MECHANISM

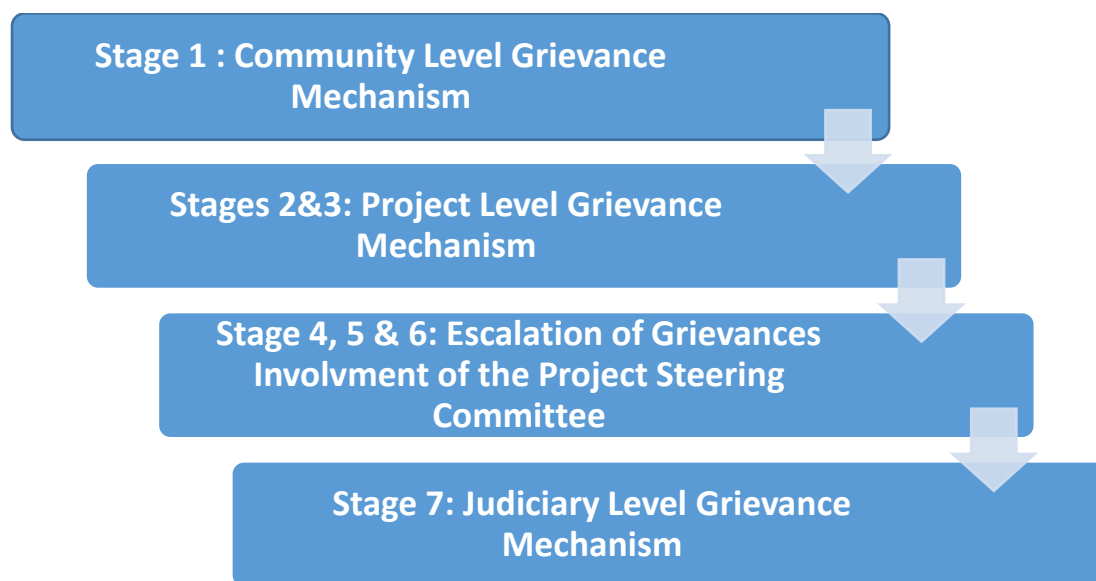
The project level process will not impede the access of affected persons or GM complainants to the legal system. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per the laws of The Gambia. However, the quality and effectiveness of the judicial system should be assessed, as well as issues related to accessibility and affordability.

7.5 Members of the National Steering Committee (NSC) of GESSP-MOBSE

MOBSE GESSP National Steering Committee (NSC)		
Designation	Name	Ministry
Permanent Secretary	Mr. Ebrima Sisawo	MoBSE
Permanent Secretary	Mr. Abdoulie Jarra	MoHERST
Permanent Secretary	Mr. Mod K Secka	MoFEA
Deputy Permanent Secretary (Programs)	Mr. Adama Jimba Jobe	MoBSE
Deputy Permanent Secretary (Admin)	Mr. Jerreh Sanyang	MoBSE
Deputy Permanent Secretary (Programs)	Mr. Madi Jatta	MoHERST
Deputy Permanent Secretary (Admin)	Mr. Sulayman Suwareh	MoHERST
Director HR	Mr. Ebrima Saily	MoBSE
Director Basic and Secondary Education	Mrs. Tida Jatta Jarju	MoBSE
Director Curriculum	Dr. Burama Jammeh	MoBSE
Director Planning	Mr. Modou Cham	MoBSE
Director Services	Mr. Ebrima Joof	MoBSE
Regional Director 1	Mr. Ousman Bah	MoBSE
Regional Director 2	Mr. Lamin Fatajo	MoBSE
Regional Director 3	Mr. Bassiru Mbenga	MoBSE
Regional Director 4	Mrs. Ida Njie	MoBSE
Regional Director 5	Mr. Paul K Mendy	MoBSE
Regional Director 6	Mr. Bakary Ceesay	MoBSE
Project Manager, PCU	Mr. Abdoulie Sowe	MoBSE

The GM process

Flowchart of the GERMP Grievance Mechanism:



Stage	Process	Duration
1	<p>The Aggrieved Party (AP) will take his/her grievance to the project or construction site supervisor (CSS)/Contractor Liaison Officer who will endeavour to resolve it immediately. Where AP is not satisfied, the CSS or CLO will refer the AP to the Project's Contact Person (PCP). For complaints that were satisfactorily resolved by the CSS/CLO, he/she will inform the PCP and the PCP will log the grievance and the actions that were taken.</p> <p>Before construction starts, the complainant will address his/her complaint directly to the project via the Project Community Liaison Officer (or Alkalos or VDCs who will be the representative of the Project Community Liaison Officer in each affected community) who will submit the case to the GRC. VDC and Alkalo will be trained to inform the CLO as soon as they receive a complaint.</p>	Anytime
2	On receipt of the complaint, the Project PCU will endeavour to resolve it immediately. If unsuccessful, he/she then notifies PIU Project Coordinator	Immediately after logging grievance
3	The PCU Project Manager will endeavour to address and resolve the complaint by submitting it to the GRC and inform the aggrieved party after the Grievance Redress Committee has taken a decision regarding his/her complaint. If it is a land-related issue, the Project Manager and the GRC will advise the Permanent Secretary, to engage the Ministry of Land and Local Government. The PCU Project Manager will also refer to the MOBSE Permanent Secretary other unresolved grievances for his/her action at the level of the Project Steering Committee.	
4	If the matter remains unresolved, or complainant is not satisfied with the outcome at the project level (GRC), the PCU Project Manager or MOBSE Permanent Secretary, will then refer the matter to the National Steering Committee (NSC) for a resolution.	7 days

- | | | |
|---|---|---------------------------|
| 5 | If it remains unresolved or the complainant is dissatisfied with the outcome proposed by the NSC, he/she is free to refer the matter to physical planning or the Ministry of Local Government and lands if it is a land matter. | Anytime |
| 6 | If it is a land related issue, the MOBSE Permanent Secretary may seek the assistance of the Physical Planning MD and Permanent Secretary of Ministry of Lands and Local Government. | Immediately after stage 3 |
| 7 | If the issue remains unresolved then the ultimate step will be for the Courts to deliberate. Any such decisions are final. | Anytime |

For cases regarding GBV, including SEA/SH and VAC, as noted above, specific procedures will be put into place under the project or contractor GM to manage SEA/SH and VAC complaints ethically and confidentially, including the establishment of a review structure to handle these complaints, that will include a response protocol to ensure timely referral for survivors to appropriate support services.

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ANNEX 1: GESSP ENVIRONMENT AND SOCIAL SCREENING CHECKLIST (ESSC)

GEOSP: SITE SCREENING CHECKLIST (TEMPLATE 1)
TO BE COMPLETED BEFORE START OF CONSTRUCTION

Prepared by:

Reviewed and cleared by:

NAME:		NAME:	
TITLE:		TITLE:	
AGENCY: MOBSE and NEA		AGENCY	
DATE:		DATE	
SIGNATURE		SIGNATURE	

PART 1: GENERAL PROJECT AND SITE INFORMATION	
Name of Village/Site	
Location of site:	
Describe site location	
Who owns the land?	

What is the total area of the donor's land? What is the percentage of land donated (over or under 10%)		
Was there any compensation for the land? (i.e. monetary, land for land, arrangements of employment in the school, etc.)		
Voluntary land donation documentation received? Tenure transfer documents received?		
Brief description of geographic, and socio-economic context		
PUBLIC CONSULTATION (Take attendance list and write detailed notes/minutes of the meeting)		
When and where did public consultation take place		
How many community members attended		
How many women representatives		
How many representatives of other vulnerable or disadvantaged groups (i.e. elders, youth, persons with disabilities, etc.)		

Is a Grievance Mechanism set up with management of SEA/SH complaints.				
?				
PART 2: ZONING ISSUES		Yes	No	Comments
i.	Will the school involve significant land disturbance or site clearance?			
ii.	Is the school located in an area susceptible to landslides or erosion?			
iii.	Is construction site near to where women and girls traverse regularly for work / commerce / household activities.			
iv.	Will the school involve the disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes)?			
v.	Is the school located on agricultural land?			
vi.	Will the school need to change the vegetation and /or cutting of trees on site			
vii.	Is the school located in an area with a wastewater network?			
viii.	Is the school located in a polluted or contaminated area?			
ix.	Does the school have access to potable water?			
x.	Is the school located less than 100m of highway or access roads with traffic (if yes, review location and/or fencing)			

xi.	Is the school located far (1-2 km) from accessible roads?			
xii.	Is the school located in an area with designated natural reserves or protected areas? [Note: If YES, the sub-project cannot be financed]			
xiii.	Will the sub-project involve the disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes)?			
xiv.	Is the school located next to a gully; or river where there is chance of flooding or inundation during rainy season			
xv.	Is the school near areas prone to erosion			
xvi.	Is the land of adequate size to accommodate pit latrine and water supply system			

ATTACHMENTS

- Site Map
- Land donation documents (include record of consultation on land donation meeting, size of donor land and area of land donated)
- Tenure transfer confirmation documents
- Verification documents confirming voluntary land donation
- Consultation records (minutes and attendance list)

ANNEX 2: CONTRACTOR ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

The Gambia Education Sector Support Project (GESSP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN OF THE CONSTRUCTION SITE (C-ESMP) FOR CLASSROOMS

July 2020



Prime Contractor

P.M.B. 352, Serrekunda P.O, The Gambia

Telephone (220) 4460363, (220) 4460357, buba.Faburay@fioh.org

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Background

The Gambia Education Sector Support Project (GESSP or the Project) will serve as successor to the Results for Education Achievement and Development Project (READ). This project will consolidate the achievements made in the sector by emphasizing educational access, and improvement of quality of teaching and learning. The objective of the project is to increase access to Early Childhood Development (ECD) and basic education and improve the quality of teaching and learning.

The Project comprises three main components:

- i) Enhancing access to ECD and basic education
- ii) Improving quality of teaching and learning
- iii) Technical and institutional support

The PCU (Project Coordination Unit) provides coordination and fiduciary management for the implementing directorates and units as well as the reporting of project activities. The PCU is under the direct responsibility and supervision of the Permanent Secretary of the Ministry of Basic and Secondary Education (MoBSE). The PCU reports directly to the Permanent Secretary. PCU staff are selected based on agreed TORs and receive enough training in Bank and donor-financed project implementation.

The PCU ensures overall coordination and supervision of implementation of education projects. It ensures that the various implementation agencies are on track regarding technical aspects of the various activities and the

rationalization of the resources. It communicates all the issues that need to be decided at the Steering Committee¹⁴ level and monitors and evaluates project implementation.

One of the key responsibilities of the PCU is to be the interface with the technical departments to ensure efficient implementation. The PCU has the capacity to provide technical support in procurement, financial management, and project monitoring and evaluation. The PCU supports the technical departments or other implementing units as facilitator of the flow of Credit funds and project resources, and acts as the clearing house for securing decision making on procurement and disbursement of funds on the activities, goods, works and services contracts financed from budgets and appointed grants.

A sub-department of PCU is the construction department. In view of the size of the investment portfolio of the sector in general and the PCU, this department is the nerve center of the PCU. Staffed with a qualified construction management specialist (a Construction Programme Manager (CPM Ebou Gaye) and assisted by other professionals like the social and environmental safeguards officers at the PCU, they will be in charge of the environmental and social supervision and monitoring of this Contractor-ESMP (C-ESMP).

3. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN OF THE CONSTRUCTION SITE (C-ESMP)

3.1 Environmental and social policy

The Director General of Future In Our Hands The Gambia (FIOHG), as Contractor, clearly defines the company's commitment to environmental, social, safety and health (ESSH) specificities in the context of construction work.

In this commitment, the contractor shall:

- Train their staff on the protection of the environment and health and safety at work and mitigate social risks, including risks for sexual exploitation and abuse (SEA) and sexual harassment (SH).
- Develop and put into place a SEA/SH Prevention and Response Action Plan, which will outline the measures that the contractor will implement to mitigate risk of SEA/SH and violence against children (VAC) on the worksite.
- Raise public awareness of the safety measures to be taken to avoid accidents and the means of prevention to reduce the incidence of various diseases (by the NEA and safeguards officers of the PCU), including sexually transmitted diseases, as well as SEA and SH, including monitoring Codes of Conduct to be signed by all workers and provision of awareness-raising and training sessions for workers (by experts from the FIOHGT and MOBSE Gender Units).
- Ensure that cases of SEA/SH and VAC are referred to the project Grievance Mechanism, if the survivor so desires, and that survivors are provided a survivor-centered and confidential response, including referrals to medical, legal, and psychosocial care and support services (any costs associated with service provision should be covered by the project)
- Involve local authorities in the execution of the project and coordinate the work with the various users of the territory
- Clearly secure work site, erect barriers for trenches and put up signage to mitigate against harm to children, persons with disabilities, and elderly and other vulnerable groups
- Provide physical barriers and enclosures at the work sites to discourage intruders, and protect the local communities (especially vulnerable groups such as persons with disabilities and children) and animals from unnecessary injury

¹⁴ The Steering Committee includes the main stakeholders of the education sector, especially the Ministry of Finance, Education Youth and Employment, Higher Education, and others as they will guide the Project to ensure smooth implementation. – if there is a full list of those in the committee, please include it here

- Have separate, safe, and easily accessible bathroom and sanitation facilities for women and men working on the site. Locker rooms and/or latrines should be in separate areas, private, and well-lit as well as include the ability to be locked from the inside.
- Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where SEA/SH is prohibited
- As appropriate, public spaces around the project grounds should be well-lit
- Promote the hiring of local labor (men and women)
- Mitigate against SEA/SH and VAC by all project workers towards local populations (the host community), especially among project workers, and a prohibition of any sexual relations with any minors under the age of 18 years and between project personnel and community members because the power dynamic between these two groups is usually imbalanced.
- Codes of Conduct with clear and unambiguous language on prohibited behaviors, including related to SEA/SH and VAC, and sanctions for infractions. These Codes of Conduct should be accompanied by ongoing sensitization and training of project workers by the (by experts from the FIOHGT and MOBSE Gender Units.
- Comply with the Grievance Mechanism procedures, including the procedures for reporting and handling SEA/SH and VAC cases ethically and confidentially and the response protocols for appropriately referring survivors to available care.
- Respect a perimeter of protection around the following sensitive areas:
 - Shorelines and rivers
 - Recognized wildlife habitats
 - Water supply basins
 - Steep and erodible slopes
 - wetlands
 - inhabited areas
- Minimize the duration of work in environmental and social sensitive areas like school sites which are near houses and football fields and respect normal working hours
- Control access to work sites and use adequate road signs
- Promote the recovery of wood in deforested areas and the reuse of dismantled materials and equipment
- Limit expropriation of rights-of-way and promote sharing of uses
- During construction, compensate women, men and communities for unavoidable or accidental losses by promoting a participatory approach and ensuring that payments are made before losses occur and that safeguards (Codes of Conduct, trained workers, functioning GM and community awareness around the GM and prohibited behavior) are in place to mitigate against gender discrimination or SEA/SH risks during the compensation process
- At the end of the work, restore the affected environment components to their original state
- Conduct community and worker awareness of the project level Grievance Mechanism (GM), including transparent, accountable and responsive grievance measure processes for laborers as well as procedures for the ethical and confidential management of SEA/SH-related cases, and keep detailed and accurate records of communication between the contractor and its supervisors as well as the community, and notify the PIU of any grievances or community issues that require the attention of the project team and thus, activation of the GM.

ANNEX 3: PROTOCOL FOR CONSULTATION AND CIVIL WORKS UNDER COVID-19 THE GAMBIA EDUCATION SECTOR SUPPORT PROJECT (GESSP) IN THE GAMBIA

1. Introduction

The novel coronavirus disease (COVID-19) has been spreading rapidly across the world since December 2019, following the initial cases in Wuhan, Hubei Province, China. Whilst the pandemic imposed enormous strain on the health systems as they try to cope with the increase demand for services, it has also resulted in tremendous economic and social hardship as governments institute measures such as ‘social distancing’ to limit the spread of the disease. One of the consequences of these measures was the closure of schools, stoppage of civil works, trade and travel, closure of borders, and other economic activities.

UNESCO reports schools in 188 countries have been closed—many for the remainder of the academic year—affecting 89.5 percent of all learners or 1.5 billion persons worldwide.² Immediate action is required to ensure continuity and restarting of economic activities and projects implementation once the pandemic effects reduce or subsides. This is particularly critical in the Bank’s least developed client countries like The Gambia.

A key source of guidance on communications, civil works, and stakeholder engagement that the Project will draw on is the Ministry of Health guidelines which are in line with the World Health Organization’s (WHO) “COVID-19 Strategic Preparedness and Response Plan: Operational Planning Guidelines to Support Country Preparedness And Response” (2020). These guidelines outline the following approach in their Risk Communication and Community Engagement - Pillar 2.

It will lay the basis for the Project’s stakeholder engagement and civil works implementation approach. The project will also draw on other recently-available resources for carrying out the implementation of the civil works in the context of COVID-19, including the World Bank’s “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” (March 20, 2020). These guidelines will be taken into consideration for the civil works in order to protect workers, the affected communities and Project staff.

In The Gambia, the first cases of COVID-19 were reported in March 2020, and following a presidential address on March 17, 2020, The Gambia closed all schools and education institutions as a measure to protect children and communities to control the spread of the virus. The school closure directly affects at least 674,300 children from early childhood to senior secondary school. The initial closure was for 21 days, and an extension of the school closure is ongoing and could possibly last at least through the beginning of the next academic year. Immediate action is required to implement the civil works for Education Sector Support Project (GESSP) to prepare school systems to reopen once the pandemic subsides. Currently, the Ministry is collaborating with the media houses for lessons delivery and sensitization of students and communities to stop the spread of COVID-19. This will be extended for the safely preparation and implementation of the civil works of this Project.

The Gambia has declared a state of Emergency, which is still maintained by the Authorities. Given the social distancing recommended in order to stop or reduce the COVID-19 transmission, the Project has decided to elaborate this Protocol in order to implement the upcoming stakeholder sensitization and civil works implementation.

1.2 Methodology

To meet best practice approaches, the Project will apply the following principles for stakeholder engagement and civil works implementation:

- **Openness and life-cycle approach:** public consultations for the Project will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation
- **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate and accessible format and language; opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns

- **Inclusiveness and sensitivity:** stakeholder identification will be undertaken to support better communication about project activities and development, transparency, accountability and build effective community relationships. The participation process for the project will be inclusive and will consider vulnerable and disadvantaged groups to ensure they can attend and fully participate in discussions. All stakeholders are encouraged to be involved in the consultation process, and this includes ensuring that the time of day of meetings is suitable for women who may have different work schedules and commitments and that persons with disabilities are able to attend and participate. Every community member will have access to information. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods and the time and location of meetings. Special attention should be given to vulnerable groups, in particular women, youth, disabled, elderly and the cultural sensitivities of diverse ethnic groups. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women.
- **Flexibility:** if social distancing inhibits traditional forms of engagement, the methodology should adapt to other forms of engagement, including various forms of internet, radio, or TV communication, and communication via mail.
- **A precautionary approach** will guide consultation process and civil works implementation to prevent infection and/or contagion, given the highly infectious nature of COVID-19. **Worker and Community Health and Safety:** to avoid or reduce the risk of contagion or spreading the COVID-19, all workers will wear their mask, goggles and other personal protective equipment (PPE) and respect social distancing protocols at the site. Same measures will be followed in interactions with local communities.
 - **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the Project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
 - **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status¹⁵, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women.

1.3 Consideration of impacts on disadvantaged/vulnerable individuals or groups

It is particularly important to understand how project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups who often do not have a voice to express their concerns or may not be considered fully when addressing the impacts of a project. It is equally important that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be undertaken with respect to infectious diseases and medical treatments. Such consultations must be adapted to consider such groups and/or individuals concerns and cultural or other sensitivities and to ensure a full understanding of project activities and benefits. Consultations should be conducted with women in sex-segregated groups and in safe and enabling settings, which means that confidentiality can be assured and that these consultations will be facilitated by other women. The vulnerability may stem from person's origin, gender, age, health condition, economic status, disability, livelihood, among others. Engagement with vulnerable groups and individuals often requires the application of specific

¹⁵ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, health status, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources, among others.

measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following: women-headed households, elders, youth, people renting land (especially women renters), youth, elders, and persons with disabilities. Vulnerable groups within the communities affected by the Project will be consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered.

1.4 Strategy

The PIU in collaboration with the stakeholders, and especially with the FIOHG, will identify and examine all the activities planned within the framework of the project requiring the engagement of stakeholders, public consultations, and civil works implementation.

FIOH and the PCU will evaluate the targets, the location, and the size of the proposed activities. Personal contact and large social gatherings or meetings will be limited and all protocols from the Government regarding social distancing will be respected. FIOH will assess the level of risk of spread to the community and how best to align with restrictions in effect at the national level.

In addition, FIOH and PCU will identify the critical activities for which the consultations cannot be postponed without significant impact on the project deadlines. At the end of this exercise, FIOH will consider viable means to obtain the contributions and commitment of stakeholders.

Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered.

Where planned civil work activities require community meetings, FIOH will assess how to put in place proper social distancing and make available PPE such as masks, eye shields, hand sanitizers, etc. for workers and community members.

Before consultation and civil works are able to start, the Project will require FIOH to identify and visit the affected communities.

The objective of this mission will be to:

- The FIOH and the PCU will also assess the media coverage to see which media channels are more suitable for spreading information about COVID-19 preventive measures, who to contact if people are exhibiting symptoms, and how to contact the Grievance Mechanism (GM) should community members have additional questions or concerns.
- According to the affected areas, FIOH and PCU will review the best telecommunication coverage to decide which ones they will use to communicate with communities, taking into account the commitment to inclusive and accessible participation and communication.
- Traditional communication channels will also be assessed to verify how they can be effective in conveying relevant information to stakeholders.

According to the outcomes of this first field visit, FIOH with the PCU will be able to start site preparation and sensitization of affected communities about the ESMP, GM, information about SEA/SH risks, especially around civil works, access to services, and how to lodge complaints through the GM, and COVID-19 mitigation measures that are recommended by the WHO and the Ministry of Health.

Following the field visit, the Project will implement specific measures to mitigate the risk of the COVID-19 transmission.

A precautionary approach will guide the consultation process and the implementation of civil works to prevent transmission and infection, given the highly infectious nature of COVID-19.

The following are some considerations for selecting channels of communication and encouraging behavior for the safe implementation of the civil works, considering the current COVID-19 pandemic. Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered:

- Avoid public gatherings (considering national restrictions or advisories), including public hearings, workshops, community meetings, and in working sites
- As smaller meetings are permitted (Five people with distance of 1.5m distance between participants), consultations will be conducted in small-group sessions, such as focus group meetings. Efforts will be made to conduct meetings through telephone or, if possible, online, channels to reduce risk of contagion or contamination
- Employ channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Communication channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, online platforms, dedicated phone lines with knowledgeable operators
- communication channels during COVID-19 will also help women receive accurate information about SEA/SH risk, access to services, and the project GM
- Each of the proposed channels of engagement will clearly specify to community members how feedback and suggestions can be provided by stakeholders via the project's GM.

1.5 Management of COVID-19 during civil works

A special COVID-19 induction will be performed for each employee before they are able to start work. Female employees should also be independently consulted by a female facilitator in safe and enabling environments to ensure the impact of COVID-19 mitigation measures on women is properly considered. This induction will be entirely dedicated to COVID-19:

- How it spreads
- How to protect oneself (including washing protocols)
- How to properly use PPE (mask and gloves) and requirements of wearing PPE
- Understanding symptoms and what to do if one is exhibiting them
- Understanding the impact of COVID-19 on vulnerable groups (who is vulnerable)

This induction will be renewed for all workers every month and every day before the start of activities, a specific briefing will be carried out by the Site Manager who is the team leader.

The Site Manager will address the following points:

- Reminder of the context and the need to respect the rules
- Reminder of barrier gestures: how to cough, hand hygiene (basins and soap will be always available on site), social distancing and wearing a mask
- Taking of temperature every morning before works start

- Reminder of the exceptional measures applicable to the activities concerned
- Reminder of the main symptoms of COVID-19
- Reminder of the COVID-19 Hotline 1052

Monitoring of symptoms and other hygiene and mitigation protocols:

- Symptoms associated with COVID-19 will be monitored in workers. Each worker should monitor the onset of symptoms for themselves and colleagues and inform their manager immediately if they feel unwell or suspect a colleague is not feeling well. If symptoms appear during the night, the employee notify their superior and not come to the construction site. . The procedure applied will then be the same as for employees who will present in the morning with fever.
- FIOH will ensure the transportation to health centers by liaising with the COVID-19 Hotline 1052 in case ambulances of the health centers are not available.
- PPE must be clean and for individual use only (they must not be shared, exchanged, or loaned between employees). Barrier/social distancing against COVID-19 must be applied during break times and meals. Drinking water materials for personnel such as a cup or water bottle must be available for all workers and must not be shared for use among workers. Anyone who is not an employee of FIOHGT, or its service providers is a visitor. Any visitor wanting access to the site must submit to the same COVID-19 mitigation controls as employees.
- Cleanliness, including sanitization, of personnel reception facilities must be maintained regularly throughout the day. Any waste likely to be infected must be managed to avoid any risk of contamination. Given the type of works, there will be very minimal hazardous waste if not any.
- FIOH will delimit the site and provide posters showing measures to be strictly followed by all who are on site.
- It is planned that about 10 people will be each work site. Workers must always wear masks, goggles, and maintain regular hand cleanliness. Hand sanitizers will be available in all strategic areas of the site.
- Equipment to take temperatures for all entering in the work sites should be available. In each site, FIOH will have two thermometers, regularly cleaned to avoid contamination in each site. Taking of temperature and management of the thermometers should be the responsibility of the ESHS officer.
- The contact information of the local COVID-19 committee (set up by the Ministry of Health under the Governor with all the relevant stakeholders in each region) COVID-19 1025 Hotline will be communicated to all workers. The contact number will be posted on site. The Project will closely work with this committee to implement the Project in a safely manner.

In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the stakeholders as below:

- All in person meetings (such as consultation meetings, focus group meetings, one on one interviews (respecting social distancing requirements, wearing masks and eye shields)
- Public notices
- Electronic publications and press releases on the MOBSE website, MOBSE TV show and community radios in the Provinces
- Telephone Interviews
- Text messages communication
- Social media notices
- Posters erected in communities

At all times, the following COVID-19 mitigation measures will be followed in engaging with the public:

- Availability of hand sanitizers
- Thermometers in each working site
- Social distancing of 1,5 meters between workers
- Less than 10 people in each site

Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions, such as committees of elders, women, youth, but also communication of religious leaders like imams and the griot (traditional communicators).

In the event none of the above means of communication is considered adequate for the required consultations with stakeholders, FIOH should discuss with the PCU to find out if the activity in question can be postponed at a later date, when significant stakeholder engagement is possible. When it is not possible to postpone the activity or when the postponement is likely to last more than a few weeks, the PCU should consult the World Bank team for advice and guidance.

1.6 Conclusion

During all this process, recommended WHO hygienic practices will be respected and monitored by the PCU safeguards team to ensure that mitigation measures would be properly followed and duly respected. As protocols and recommendations by the WHO changes in response to this pandemic, these protocols will be updated accordingly.

ANNEX 4: TERMS OF REFERENCE FOR ENVIRONMENTAL AND SOCIAL ASSESSMENT AND ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

A. PROJECT CONTEXT AND JUSTIFICATION

Project Context

1. [In this section describe the context and the project, including the project development objectives and project components]

Justification

2. [In this section, include the project justification]

B. ESIA REQUIREMENTS

3. The Borrower will carry out an Environmental and Social Impact Assessment (ESIA) of the project to assess its environmental and social risks and impacts of the project throughout the project life cycle.¹⁶ The assessment will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct,¹⁷ indirect¹⁸ and cumulative¹⁹ environmental and social risks and impacts throughout the project life cycle,
4. The ESIA will be based on current information, including an accurate description and delineation of the project and any associated aspects, and environmental and social baseline data at an appropriate level of detail sufficient to inform characterization and identification of risks and impacts and mitigation measures. The ESIA will evaluate the project's potential environmental and social risks and impacts; examine project alternatives; identify ways of improving project selection, siting, planning, design and implementation in order to apply the mitigation hierarchy²⁰ for adverse environmental and social impacts and seek opportunities to enhance the positive impacts of the project. The ESIA will include inclusive and accessible stakeholder engagement, considering the needs of vulnerable groups and individuals, as an integral part of the assessment.
5. The ESIA will be an adequate, accurate, and objective evaluation and presentation of the known risks and impacts, prepared by qualified and experienced persons.
6. The Borrower will ensure that the ESIA takes into account in an appropriate manner all issues relevant to the project, including:

¹⁶This may include preconstruction, construction, operation, decommissioning, closure and Reinstatement/restoration.

¹⁷ A direct impact is an impact which is caused by the project and occurs contemporaneously in the location of the project.

¹⁸ An indirect impact is an impact which is caused by the project and is later in time or farther removed in distance than a direct impact, but is still reasonably foreseeable, and will not include induced impacts.

¹⁹ The cumulative impact of the project is the incremental impact of the project when added to impacts from other relevant past, present and reasonably foreseeable developments as well as unplanned but predictable activities enabled by the project that may occur later or at a different location. Cumulative impacts can result from individually minor but collectively significant activities taking place over a period of time. The environmental and social assessment will consider cumulative impacts that are recognized as important on the basis of scientific concerns and/or reflect the concerns of project-affected parties. The potential cumulative impacts will be determined as early as possible, ideally as part of project scoping.

²⁰ See paragraph 7, which explains the mitigation hierarchy.

- the country's applicable policy framework, national laws and regulations, and institutional capabilities (including implementation) relating to environment and social issues; variations in country conditions and project context; country environmental or social studies; national environmental or social action plans; and obligations of the country directly applicable to the project under relevant international treaties and agreements;
- applicable requirements under the Operational Policies; and
- the Environmental and Health Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP).²¹

7. The ESIA will set out and apply a mitigation hierarchy, which will:

- i. Anticipate and avoid risks and impacts;
- ii. Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
- iii. Once risks and impacts have been minimized or reduced, mitigate;²² and
- iv. Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.²³

8. The ESIA, informed by the scoping of the issues, will take into account all relevant environmental and social risks and impacts of the project, including:

9. **Environmental risks and impacts, including:** (i) those defined by the EHSs; (ii) those related to community safety (including dam safety and safe use of pesticides); (iii) those related to climate change and other transboundary or global risks and impacts; (iv) any material threat to the protection, conservation, maintenance and restoration of natural habitats and biodiversity; and (v) those related to ecosystem services²⁴ and the use of living natural resources, such as fisheries and forests

10. **Social risks and impacts, including:** (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence²⁵; (ii) risks that project impacts fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable;²⁶ (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged

²¹ Good International Industry Practice (GIIP) is defined as the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise should be that the project employs the most appropriate technologies in the project-specific circumstances.

²² The requirement to mitigate impacts may include measures to assist project-affected parties to improve or at least restore their livelihoods as relevant in a particular project setting.

²³ The Borrower will make reasonable efforts to incorporate the costs of compensating and/or offsetting for the significant residual impacts as part of project costs. The environmental and social assessment will consider the significance of such residual impacts, the long-term effect of these on the environment and project-affected people, and the extent to which they are considered reasonable in the context of the project. Where it is determined that it is not technically or financially feasible to compensate or offset for such residual impacts, the rationale for this determination (including the options that were considered) will be set out in the environmental and social assessment.

²⁴ Ecosystem services are the benefits that people derive from ecosystems. Ecosystem services are organized into four types: (i) provisioning services, which are the products people obtain from ecosystems and which may include food, freshwater, timbers, fibers, and medicinal plants; (ii) regulating services, which are the benefits people obtain from the regulation of ecosystem processes and which may include surface water purification, carbon storage and sequestration, climate regulation, protection from natural hazards; (iii) cultural services, which are the nonmaterial benefits people obtain from ecosystems and which may include natural areas that are sacred sites and areas of importance for recreations and aesthetic enjoyment; and (iv) supporting services, which are the natural processes that maintain the other services and which may include soil formation, nutrient cycling and primary production.

²⁵ This includes Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).

²⁶ Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.

or vulnerable, including women and children; (iv) negative economic and social impacts relating to the involuntary taking of land or restrictions on land use; (v) risks or impacts associated with land and natural resource tenure and use,²⁷ including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vi) impacts on the health, safety and well-being of workers and project-affected communities, which include risks related to SEA/SH; and (vii) risks to cultural heritage.

11. Where the ESIA identifies specific individuals or groups as disadvantaged or vulnerable, the Borrower will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing any development benefits and opportunities resulting from the project.
12. For projects involving multiple small subprojects,²⁸ that are identified, prepared and implemented during the course of the project, the Borrower will carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects in line with the risk classification.
13. The ESIA will consider potentially significant project-related transboundary and global risks and impacts, such as impacts from effluents and emissions, increased use or contamination of international waterways, emissions of short- and long-lived climate pollutants,²⁹ climate change mitigation, adaptation and resilience issues, and impacts on threatened or depleted migratory species and their habitats.

C. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

18. The Borrower will continue to engage with, and provide sufficient information to stakeholders throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.
19. The ESIA must include a description of how the Borrower will propose and implement a grievance mechanism to address these concerns and receive complaints and facilitate their resolution, including procedures within the GM regarding the ethical and confidential management of SEA/SH claims. The ESIA will clearly define roles, responsibilities and accountabilities and designate the persons who will be responsible for implementing and monitoring stakeholder engagement activities and ensuring compliance with national laws and regulations.
20. If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the Borrower will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated.

D. PROJECT MONITORING AND REPORTING

²⁷ Due to the complexity of tenure issues in many contexts, and the importance of secure tenure for livelihoods, careful assessment and design is needed to help ensure that projects do not inadvertently compromise existing legitimate rights (including collective rights, subsidiary rights and the rights of women) or have other unintended consequences, particularly where the project supports land titling and related issues. In such circumstances, the Borrower will at a minimum demonstrate to the Bank's satisfaction that applicable laws and procedures, along with project design features (a) provide clear and adequate rules for the recognition of relevant land tenure rights; (b) establish fair criteria and functioning, transparent and participatory processes for resolving competing tenure claims; and (c) include genuine efforts to inform affected people about their rights and provide access to impartial advice.

²⁸ For example, a Bank-supported project with multiple small subprojects, as in the case of community-driven development projects, projects involving matching grant schemes, or similar projects designated by the Bank.

²⁹ This includes all greenhouse gases (GHGs) and black carbon (BC).

22. The Borrower will monitor the environmental and social performance of the project. The extent and mode of monitoring will be agreed upon with the Bank and will be proportionate to the nature of the project, the project's environmental and social risks and impacts, and compliance requirements. The Borrower will ensure that adequate institutional arrangements, systems, resources and personnel are in place to carry out monitoring, which should include ethical management of any GBV or SEA/SH-related data or information. Where appropriate, the Borrower will engage stakeholders and third parties, such as independent experts, local communities or NGOs, to complement or verify its own monitoring activities. Where other agencies or third parties are responsible for managing specific risks and impacts and implementing mitigation measures, the Borrower will collaborate with such agencies and third parties to establish and monitor such mitigation measures.
23. Monitoring will normally include recording information to track performance and establishing relevant operational controls to verify and compare compliance and progress. Monitoring will be adjusted according to performance experience, as well as actions requested by relevant regulatory authorities and feedback from stakeholders such as community members. The Borrower will document monitoring results.
24. The Borrower will provide regular reports (no less than annually) to the Bank of the results of the monitoring. Such reports will provide an accurate and objective record of project implementation. Such reports will include information on stakeholder engagement conducted during project implementation. The Borrower, and the agencies implementing the project, will designate senior officials to be responsible for reviewing the reports.
25. The Borrower will facilitate site visits by Bank staff or consultants acting on the Bank's behalf. The Borrower will notify the Bank promptly of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. The notification will provide sufficient detail regarding such incident or accident, including any fatalities or serious injuries. The Borrower will take immediate measures to address the incident or accident and to prevent any recurrence, in accordance with national law and the ESSs.

E. KEY PRINCIPLES AND TASKS OF THE ESIA

26. The ESIA will provide more precisely the following:
 - explicit methodological procedures and approaches for consideration of environmental and social aspects, standard mitigation measures and tools needed to identify impacts and mitigation measures.
 - The roles and responsibilities of the different structures involved in the implementation and monitoring of the Project.
 - The training, capacity building and other technical assistance needs necessary for the implementation of the ESIA.
 - An estimate of the budget needed to carry out ESIA activities (which will subsequently be included in the project budget and related investments).
27. The Environmental and Social Management Framework (ESMF) of the project will also have to comply with the country's environmental legislation.
28. Because of the potential negative impacts of some project developments on the socio-economic and natural resource base of countries, these safeguards, in addition to understanding positive impacts, provide an operational framework for the identification, analysis of negative impacts and appropriate mitigation measures by avoiding or eliminating negative environmental and social impacts or reducing them to an acceptable level.

E. QUALIFICATION AND TIMELINE OF DELIVERABLES

1. Timeline for complementation of deliverables and payment schedule (duration of contract)
2. Qualification of consultant(s) (in consultation with the WB)

29. The main tasks and associated results or deliverables are described below:

- a) Describe the biophysical environment and the environmental and social situation in the Project intervention area, which represent the baseline of the Project;
- b) Describe and provide baseline data for the social environment;
- c) The political, legal and institutional framework for environmental management and assessment of impacts relevant to the nature of the project;
- d) The procedures of The Gambia in the Environmental and Social Assessment process;
- e) Institutional modalities for consideration of environmental and social aspects in the implementation of sub-projects / activities at the community level;
- f) Identify, evaluate and measure the extent of positive and negative impacts and direct and indirect environmental risks in the Project's areas of intervention;
 - include the impact on people by the specific activities of the project, including public health (malaria, schistosomiasis, other forms of water-related diseases and pesticide misuse) and proposed appropriate mitigation measures
- g) Identify, evaluate and measure the extent of positive and negative impacts and direct and indirect social risks in the Project's areas of intervention;
 - include differentiated mitigation/social inclusion measures for vulnerable/disadvantaged groups and individuals (including women, ethnic groups including pastoralists, persons with disabilities, youth, illiterate persons, etc). for project benefits, GM, SEP (and ensure accessible disclosure)
 - include sexual exploitation and abuse/sexual harassment (SEA/SH) risk assessment and risks to children, labor practices, especially those in vulnerable situations
 - ensure the stakeholder engagement plan includes disadvantaged/vulnerable groups and individuals and has differentiated measures to enhance participation/engagement and share in project benefits (strengthen opportunities for citizen engagement especially at local level to foster social cohesion, service delivery, and accessible GM)
 - incorporate where appropriate, traditional forms of GMs but also must also balance with ensuring accessibility/inclusion of disadvantaged and marginalized individuals and groups
 - consider access to land/natural resources especially for its potential to exacerbate tensions, deepen poverty and inequality (especially among women, certain forms of livelihoods such as pastoralism)
 - incorporate culturally appropriate measures when assessing risks and impacts and project benefits, especially as they relate to vulnerable livelihoods, persons and groups (include impacts on local cultures, languages and customs)
 - consider social fragility/conflict risks including poverty as a driver of fragility, inter-community dynamics between differences in access to services (i.e. water, food, land), differences in land and resource uses, livelihoods, unemployment, etc.

- h) Provide a checklist of types of impacts and corrective actions to avoid and/or mitigate them. The consultant will present, in annex, a table containing the types of impacts and the appropriate mitigation measures taking into account the typology of irrigated systems given above, and social issues/risks above. They must also propose, as far as possible, actions for the improvement of the environmental and social conditions in the areas of intervention of the project;
- i) Develop a framework for participatory monitoring and evaluation of programs as set out above to ensure effective and efficient implementation of the environmental and social issues highlighted in the ESIA;
- j) Describe the mechanism and institutional arrangements for the implementation of the ESIA and preparation of the ESMPs, specifying the roles and responsibilities of the agencies and all actors (central, regional / local, municipal and village) involved in the implementation;
- k) Evaluate the capacities of the governmental and local implementing agencies involved in the implementation of the ESIA and sensitization on the environmental and social issues of the project and propose appropriate measures for sensitization, institutional strengthening and/or technical capacity building different actors;³⁰
- l) Develop a public consultation and participation program involving all project stakeholders including key beneficiaries and those directly affected by the project, including women, youth and vulnerable groups. A separate Stakeholder Engagement Plan needs to be prepared and it should be summarized in the ESIA annex;
- m) Develop a monitoring and evaluation mechanism to ensure systematic and effective monitoring of the main ESIA recommendations;
- n) The preparation of standard detailed terms of reference for the strategic, regional or sectoral impact assessment to accompany the preparation of ideas for new investment projects and related technical analyses/studies.

F. OUTLINE OF THE ESIA

- Cover page (name of project, name of instrument, date, indicate version) [information about preparer can be in a footnote or annex]
- Table of Contents
- List of Acronyms

(a) Executive Summary

- Concisely discusses significant findings and recommended actions.

(b) Legal and Institutional Framework

- Analyzes the legal and institutional framework for the project, within which the environmental and social assessment is carried out.

³⁰ Environmental and social assessment can provide opportunities for coordinating environmental and social-related responsibilities and actions in the host country in a way that goes beyond project boundaries/responsibilities and, as a result, where feasible should be linked to other environmental and social strategies and action plans, and free-standing projects. The ESIA for a specific project can thereby help strengthen environmental and social management capability in the country and both Borrowers and the Bank are encouraged to take advantage of opportunities to use it for that purpose. The Borrower may include components in the project to strengthen its legal or technical capacity to carry out key environmental and social assessment functions. If the Bank concludes that the Borrower has inadequate legal or technical capacity to carry out such functions, the Bank may require strengthening programs to be included as part of the project.

- Compares the Borrower's existing environmental and social framework and the Ops and identifies the gaps between them.
- Identifies and assesses the environmental and social requirements of any co-financiers.

(c) Project Description

- Concisely describes the proposed project and its geographic, environmental, social, and temporal context, including any offsite investments that may be required (e.g., dedicated pipelines, access roads, power supply, water supply, housing, and raw material and product storage facilities), as well as the project's primary suppliers.
- Through consideration of the details of the project, indicates the need for any plan to meet the requirements of national law and WB policies
- Includes a map of sufficient detail, showing the project site and the area that may be affected by the project's direct, indirect, and cumulative impacts.

(d) Baseline Data

- Sets out in detail the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures. This should include a discussion of the accuracy, reliability, and sources of the data as well as information about dates surrounding project identification, planning and implementation.
- Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions.
- Based on current information, assesses the scope of the area to be studied and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences.
- Takes into account current and proposed development activities within the project area but not directly connected to the project.

(e) Environmental and Social Risks and Impacts

- Takes into account all relevant environmental and social risks and impacts of the project. This will include the environmental and social risks and impacts arising as a consequence of the specific nature and context of the project.

(f) Mitigation Measures

- Identifies mitigation measures and significant residual negative impacts that cannot be mitigated and, to the extent possible, assesses the acceptability of those residual negative impacts.
- Identifies differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable.
- Assesses the feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of proposed mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the proposed mitigation measures.
- Specifies issues that do not require further attention, providing the basis for this determination.

(g) Analysis of Alternatives

- Systematically compares feasible alternatives to the proposed project site, technology, design, and operation—including the "without project" situation—in terms of their potential environmental and social impacts.
- Assesses the alternatives' feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the alternative mitigation measures.
- For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible.

(h) Design Measures

- Sets out the basis for selecting the particular project design proposed and specifies the applicable ESHGs or if the ESHGs are determined to be inapplicable, justifies recommended emission levels and approaches to pollution prevention and abatement that are consistent with GIIP.

(j) Appendices

- List of the individuals or organizations that prepared or contributed to the environmental and social assessment.
- References—setting out the written materials both published and unpublished, that have been used.
- Record of meetings, consultations and surveys with stakeholders, including those with affected people and other interested parties. The record specifies the means of such stakeholder engagement that were used to obtain the views of affected people and other interested parties.
- Tables presenting the relevant data referred to or summarized in the main text.
- List of associated reports or plans.

G. INDICATIVE OUTLINE OF AN ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. The Borrower will:

- (i) identify the set of responses to potentially adverse impacts;
- (ii) determine requirements for ensuring that those responses are made effectively and in a timely manner; and
- (iii) describe the means for meeting those requirements.

Depending on the project, an ESMP may be prepared as a stand-alone document³¹. The content of the ESMP will include the following:

(a) Mitigation

- The ESMP identifies measures and actions in accordance with the mitigation hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels.
- The plan will include compensatory measures, if applicable. Specifically, the ESMP:
 - i. identifies and summarizes all anticipated adverse environmental and social impacts (including those involving involuntary resettlement, OHS/CHS, SEA/SH, stakeholder engagement and grievance, etc.);
 - ii. describes—with technical details—each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate;
 - iii. estimates any potential environmental and social impacts of these measures; and
 - iv. takes into account, and is consistent with, other mitigation plans required for the project (e.g., for involuntary resettlement, indigenous peoples, or cultural heritage).

(b) Monitoring

³¹ This may be particularly relevant where the Borrower is engaging contractors, and the ESMP sets out the requirements to be followed by contractors. In this case, the ESMP should be incorporated as part of the contract between the Borrower and the contractor, together with appropriate monitoring and enforcement provisions.

- The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP.³²
- Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to: (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

(c) Capacity Development and Training

- To support timely and effective implementation of environmental and social project components and mitigation measures, the ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level.
- Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training).
- To strengthen environmental and social management capability in the agencies responsible for implementation, the ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

(d) Implementation Schedule and Cost Estimates

- For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

(e) Integration of ESMP with Project

- The Borrower's decision to proceed with a project, and the Bank's decision to support it, are predicated in part on the expectation that the ESMP will be executed effectively. Consequently, each of the measures and actions to be implemented will be clearly specified, including the individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so doing will be integrated into the project's overall planning, design, budget and implementation.

³² Monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. Such information enables the Borrower and the Bank to evaluate the success of mitigation as part of project supervision, and allows corrective action to be taken when needed.

ANNEX 5A: SUMMARY OF DISCUSSIONS WITH REPRESENTATIVES OF GOVERNMENT AGENCIES

i) Meeting with the Construction Programme Manager, Mr. Ebou Serign Gaye, (PCU) on January 2, 2018

- The Programme Manager emphasized the need to see that safeguards policies are fully implemented during the project implementation. This, he said, will require a better understanding of the safeguards instruments. He therefor insisted on the need to train the construction monitors and the contractors especially on the World Bank safeguards policies. Mr. Gaye also referred to some of recommendations of the last audit report which need to be taken in to account.
- With respect to the implementation arrangements, Mr. Gaye suggested the possibility of having two focal points—one for social and the other for environmental. On the supervisory role of the other implementation partners namely: NEA and DWR, Mr. Gaye expressed the need to maintain them based a revised MoU. However, he said DWR will be expected to do a better next time.

ii) Meeting at the Department of Lands and Surveys on January 4, 2018

The meeting was chaired by the Director of Lands and Surveys, Mr. Kebba Ceesay, and attended by the Director of Physical Planning and Housing, Mr. Musa Badgie, and the Valuation Officer, Mr. Omar Darbo. The officials presented the various laws and regulations relating to land administration, particularly the State Lands Act 1991, the Lands (Regions) Act 1991 which was formerly known as the Provinces Land Act. They explained the increasing pressure on land particularly in urban and peri-urban areas. Therefore it was important, they explained that Government agencies consult with their when discussing a project that may require land.

They also raised the issue of the high compensation costs and question the ability of the Government to make such payments when the annual allocation from the Ministry of Finance is very low. This situation is further complicated by the fact that in the urban areas the people whose land is required for the project are asking for in-kind land compensation and not cash compensation which they consider to be small and the Government does not have enough land in the urban areas to address all these land need. There is an increasing awareness of the value of land. However, it was generally recognized that in the regions where the GEESP is to be implemented land availability is less acute.

iii) Meeting with the Acting Programme Manager, Mr. Abdoulie Sowe, on Thursday 4th January 2018

The meeting was attended by the Procurement Officer, Mr. Addison Gomez. The Acting Programme Manager, expressed the need for an early conclusion of the study to allow the proposed project to move forward. He emphasized the supervisory role of NEA in the implementation of the safeguards policies and said that the PCU will work hard to improve relations which were raised in audit report on the READ Project. He suggested that the nationwide supervision missions should be biannual and not quarterly in view of the category B status of the project. However, the internal monitoring at the level of PCU should be strengthened by building the capacity of the construction monitors and the focal point.

iv) Meeting with the Construction Monitors on January 4, 2018

The meeting was chaired by Mr. Musa Jassey, Quantity Surveyor, and attended by four of the six CMs. The meeting discussed the important role of the CM in the screening and monitoring programme. The CMs raised the issue of a structured training to allow a better understanding of the safeguards policies which will give them a sense of direction common to all. They also expressed the need to meet before the project starts to have a common understanding of all the key activities relating to the implementation of the safeguards instruments. This will ensure monitors have a common understanding and approach and also allow a consistent assessment of the compliance of contractors.

The Monitors also raised the issue of having proper coordinates for all land donated to avoid the risks of encroachment which sometimes occur when villagers give land. For this purpose they recommended that the

project should provide a Global Positioning System (GPS) for all monitors to establish the exact coordinates for land donated to the school.

Finally the CM lamented the problem of mobility. Their work, they said, is very much constrained by the lack of mobility which limits the number of site visits. They find the motorcycle inadequate in view of the large distances to be travelled, the frequency of travel and the risks associated with their on some of the tracks in the rural tracts.

v) Meeting with the officials of the National Environment Agency, January 8, 2018

The meeting was Chaired by the Executive Director of NEA, Mr. Momodou Suwareh, and attended by Messrs Harouna Jobe (Senior Programme Officer Agriculture and Natural Resources) and Buwe Hdara (). The Executive Director expressed the need for closer collaboration and partnership to facilitate the implementation of the supervision responsibilities assigned to his agency. In the past this has not been the case and as a result NEA has not been able to fulfill its role properly. The release of funds has been a particularly difficult issue as a result of misunderstandings which need to be addressed in the new arrangement. With respect to the number of nationwide monitoring the Agency agreed to biannual visits with the Regional Environmental Officers doing quarterly visits in their regions. The agency also accepted to take part in any training programme on safeguards policies. The consultant requested the agency to prepare an indicative budget of their supervision and training activities. This was prepared and submitted.

vi) Meeting with the Senior Education Officer responsible for Planning and Human Resources in Region 4, Mr. Musa Bah, on January 10, 2018

The discussion focused on the responsibilities of the various staff at the Regional Directorate in order to determine how they can contribute to an effective implementation of the safeguards policies. Mr. Bah explained that the Director handles policy matters, sensitization on education in the communities and land matters. When a community cannot resolve the land issue the Director would normally refer the issue to the District Chief and subsequently the Governor. The CM helps to determine the suitability of the land in terms of the location and the topography.

The Cluster Monitors are responsible for a minimum of 8 schools and their role is to monitor compliance with educational standards and provide technical support to the head teachers. Through cluster meetings they identify needs. The Planning Focal Point is responsible for school mapping.

The work of the Regional Directorate is supported in the area of environment by the Regional Environment Officers who sometimes called on to join supervision missions or visit certain location/ schools to assess the environmental situation.

There is overall adequate capacity at the regional level to provide the screening exercise as well as the monitoring of the implementation of the safeguards policies. For effectiveness it is important to include these different categories of staff at regional level in any future safeguards training.

vii) Meeting with the Permanent Secretary, Mr. Mohammed B. S. Jallow, January 12, 2018

The consultant had a final meeting with the Permanent Secretary and the staff of the PCU to discuss some of the key findings. On implementation the meeting proposed the retention of one Focal Point within the PCU that will be responsible for overseeing and supervising the CMs. However, it will be necessary to build the capacity at the different levels to ensure a proper understanding of the safeguards policies especially those of the World Bank.

On the site visit the consultant reported on the enthusiasm of the communities except one (Fass Chaho) for the project and their willingness to provide land. The sites were randomly selected. In addition to the schools, some of the communities also raised other development needs such as health facility and water supply.

The meeting also discussed at length the issue of allocating vehicles to CM to facilitate and improve their mobility. The Permanent Secretary agreed to have the matter further reviewed.

On the monitoring of the water facilities the Permanent Secretary expressed the view to end the arrangement with DWR and explore the private sector to deliver this service. The use of the services of DWR was discussed earlier, he said and the decision reached was to use the private sector because it was believed will be more efficient. The meeting also agreed on improving the relationship with NEA and as part of this process Mr. Jallow said they had been inviting the agency to CCM meetings and REO have been invited to take part in the quarterly project site visit by the PCU. These developments need to be strengthened.



Meeting with the Permanent Secretary and Staff

Annex 5b: Summary of Consultations with the potential beneficiary communities 8-10 January 2018

The selection was made out of a comprehensive list of all potential sites based on the Planning Units assessment.

For the time available a total of seven sites were visited in regions 3, 4, and 5. They include:

1. Fass Chaho-Upper Niumi District North bank Region
2. Bereto- Illiasa District-NBR
3. Ballanghar Chamen-Lower Saloun District- CRR North
4. Wellingara-Kejaw- Lower Fulladu West- CRR South
5. Moria- Niamina East-CRR South
6. Kundon Fulakunda, Kiang Central, LRR
7. Wudeba, Kiang West, LRR

At the meetings the GESSP was introduced stating the main objectives and the planned activities. The project requirement for land was explained and the fact that any land given will have to be the subject of a donor certificate and that such land will be the permanent property of the school. The villagers were informed that they were not under obligation to give land however, if land is not available then the project will have to go elsewhere where land is available.

The mission also explained the need for consultation and participation before, during and after the project because the schools should be seen as belonging to the community so the involvement of the community from the start will give them the opportunity to have their views taken into account and thereby facilitate ownership and sustainability.

In general the communities welcomed the possibility of having the ECD as they saw it as a beginning that can lead to further development. In some cases the communities said that this was a development they were looking for over twenty years (Wudeba and Mria villages). It was only in Fass Chaho that the community rejected the school saying they were interested in traditional daara which was established by the elders. They will only accept an ECD if it goes together with support for their daara. This is a traditional centre of koranic studies although some members of the community are already sending their children to western type education school in neighbouring villages. Although the proposed ECD does not address their needs the mission advised them to contact the PCU for possible assistance under the 'daara' scheme.

The communities also took the opportunity of our presence to raise other development issues for their communities such as health facility and water supply (Wudeba and Ballagher Chamen). The mission explained that this will have to be handled by other competent Government agencies. With respect to water supply they were informed that the proposed ECD will also include water supply points which will benefit the community. It was interesting to note that in Balaghar Chamen it was the women who insisted and convinced the men to fully endorse the ECD project. One of them, Njome Ceesay, put up a strong case for the ECD saying it is when you travel that you appreciate the value of learning. Even letters received in the village have to be taken elsewhere to be translated. The community certainly needs a school and an ECD is a good beginning.

All the communities that accepted to have the ECD indicated their willingness to provide land on the conditions explained and promised to cooperate fully with the project to ensure ownership and success. They also promised to ensure that the community provides annually sufficient children to the school.

Table 6A: List of communities visited with their observations

S/No.	Community	Key remarks /observations by the community
1	Fass Chaho	Not interested in the EDC but would welcome support if it can be combined with daara education

S/No.	Community	Key remarks /observations by the community
	Community Mostly Wolof	The priority for the community is to ensure that the children have basic quoranic education. Western education, they said, can come after they have received their daara education
2	Bereto Community mainly Mandinka	Express delight for the opportunity to be considered for the new project as it will reduce the distance to travel to school for the young ones some of whom are not attending school presently because of the distance to Farafenni (about 3-4 km) Sometimes children have to stop going if they are not well / have physical handicap because of distance. Mrs Amie Mboge referred to the case of her daughter who to stop because she was not very well and could not walk the long distance to Farafenni. Land they said will be available for construction The community raised the problem of water supply
3	Ballanghar- Chamen Community mainly Wolof	The women insisted on having the ECD and they were joined by the men after an initial hesitation on their part. They expressed appreciation for being consulted on this matter especially since this is the first time they are given such an opportunity. They promised to make land available for the ECD. The community raised the problem of water supply for the community
4	Wellingara Kejaw Community mainly Mandinka and some Fula	The Community welcomed the ECD because presently some of the children have to travel to Brikamaba and Saruja while the younger ones stay at home. The ECD will also offer greater security. They requested that the contractors give employment opportunities to local people if possible
5	Moria Mixed community of Mandinka, Wolof and Fula	Expressed delight in the possibility to have an ECD because they are far from schools in Sinchu Bundu and Kudang. They cited the case of Mamadou who had to withdraw four of his daughters from school in the neighbouring village because of the distance they have to travel after they close from the afternoon session. They confirmed availability of land.
6	Kundon Fulakunda Mainly Fula with some Mandinka and wolofs	Expressed delight in the opportunity as they have been asking the Government for the last 20 years to build a school. Because of the distance many of the younger children cannot travel to the schools in the neighboring villages of Jiroff, Nema and Kwinella. They confirmed the availability of land and assured the mission that they will work had to ensure the school has regular supply of children. The community expressed the need for health facility.

S/No.	Community	Key remarks /observations by the community
		They were informed that this would be better addressed by the Ministry of Health.
7	Wudeba Mainly Fula and some Mandinka	<p>Said the nearest school is Dumbuto about 3 km away and which little children cannot walk to so they do not go to school.</p> <p>They also confirmed availability of land on the conditions explained by the mission.</p> <p>The VDC chairperson said the women will regularly monitor school attendance and ensure that all parents sent all the children to the ECD</p>

ANNEX 6A: LIST OF PERSONS CONTACTED IN GOVERNMENT INSTITUTIONS/AGENCIES

NAME	FUNCTION	INSTITUTION	TEL	EMAIL
Mr. Mohammed B. S. Jallow	Perm. Secretary	MoBSE		msjallow@gmail.com
Mr. Abdoulie Sowe	Acting Project Mgr.	PCU, MOBSE	9966871	Aasowe45@gmail.com Gpn.pcu@edu.gm
Mr. Ebou Serign Gaye	Construction Prog. Manager	PCU,	9960661	ebouserigngaye@yahoo.com cpm@edugambia.gm
Musa Jassey	Quantity Surveyor & ESFP		3308980	mukjasy@yahoo.com
Mr. Musa Bah	Snr. Educ. Officer	Region 4, MoBSE	6303063	musabahdongoroba@gmail.com
Mr. Addison Gomez	Procurement Manager		9914525 9964525	Addison_ms@yahoo.com
Mr. Yaya Sanyang	Construction Monitor		3360129	yahyamas2000@gmail.com
Mr. Mamudu Ceesay			9918160	mamudouceeay8960@yahoo.com
Mr. Ousman Bojang			3305778	baousman@gmail.com
Mr. Momodou Suwareh	Executive Director	NEA	9962978	
Mr. Aarouna Jobe	SPO-agric. & NR		9993622	arunajobe@gmail.com
BUWE HAIDARA			9502012	Mrhydara99@gmail.com
Mr. Kebba Ceesay	Director	Dept of Lands & Surveys	9910436	ckebba@yahoo.com
Mr. Musa Badgie	Director	Dept Physical Planning & Housing	9960228	mbadgie@yahoo.com
Mr. Dawda Darbo		Dept. of Lands		

Annex 6b : List Persons contacted at the Potential Project sites

Name	Function	Village	Tel.
Momat Saho	Alkali	Fass Chaho	
Bubacar Saho	Dep. Alkali	"	2055854
Alh. Tijan Saho	Khalif	"	
Alaji K. Saho	Secretary, VDC	"	7201940
Alh. Bubu Jah	Elder	"	
Aja Seinabu Faal	Women Elder	"	
Abdou Kanteh	Alkali	Bereto	
Omar Keita	Cashier, VDC	"	3904890
Imam Abdu Suno	Imam	"	
Ebrima Marong	Member, VDC	"	6670596
Mariama Kanteh	Member women kafo	"	6996833
Binta Sawaneh	Women Youth leader	"	
AMIE Mboge	Member women's kafo	"	6931648
Modou Cham	Alkali	Ballanghar Chamen	
Sait Cham	Imam	"	
Ali Cham	Youth leader	"	
Alaji Cham	Youth Leader	"	
Ousman Cham		"	
Njome Ceesay	Women Leader	"	
Fatou Cham	"	"	
Mbengue Touray	"	"	
Samba Jaiteh	Alkali	Wellingara Kejaw	6313607
Bamba B. Sanneh	Chairman , VDC	"	6392564
Sidi Keita	Village Elder	"	6210520
Mama Fatty	Women Elder	"	7612861
Isatou Fatty	"	"	
Mariama Dumbuya	Member VDC	"	
Kaddy Drammeh	"	"	
Kaddy Sidibeh	Alkali	Moria	7958079
Fatou Camara	Sec. Women Garden Kafo	"	3623875
Seit Jobe	Member VDC	"	70227581
Isatou Keita	Member Women Garden Kafo	"	7018417
Momad jallow	V/Chairman VDC	"	
Amina Jobe	Member Women Garden Kafo	"	7796476
Sireh Keita	"	"	6319034
Kebba Jarra	Asst. Alkali	Kundon Fulakunda	6961648
Alasan Tarawalle	Village Elder	"	2189367
Omar Jarra	VDC Member	"	7376615
Mamadou Bah	"	"	7636304
Kaddy Yabo	"	"	2342099
Subba Jawo	Chairman VDC	"	2573628
Awa Jawo	VDC Member	"	2775702
Mai Yabo	"	"	2993030
Yaya Bah	"	"	7841062
Lamin Jawo	"	"	6213058
Isatou Jarra	"	"	7098902
Burama Kolley	Village Elder	Wudeba	7775087

Name	Function	Village	Tel.
Ebrima Jallow	Youth Leader	"	7970932
Omar Kolley	Member VDC	"	2845460
Mrs. Adama Bah	Chair person VDC	"	7837678
Isatou Ceesay	Village Elder	"	7039295
Ismaila Jallow	Youth leader	"	7987066
Omar Bah	Member VDC	"	7615127
Samba Sidibeh	Village Elder	"	6209675
Habib Jallow	Youth Leader	"	2298175
Mamad Saloum	"	"	

ANNEX 7: BIBLIOGRAPHY

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ANNEX 8: TERMS OF REFERENCE (TOR) FOR THE ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK FOR THE GAMBIA EDUCATION SECTOR SUPPORT PROGRAM

I. Introduction

The Government of The Gambia in collaboration with The World Bank is preparing a Project Appraisal Document (PAD) which gives an outline of a future education sector support program. The program will serve as successor to the Results for Education Achievement and Development Project (READ) and would consolidate the achievements made thus far in the sector by placing particular emphasis on educational access, and improvement of quality of teaching and learning.

II. Project Objectives

The proposed project seeks to increase access to ECD and basic education and improve quality of teaching and learning.

III. Project Components

The Project comprises three main components: i) Enhancing Access to ECD and Basic Education; ii) Improving Quality of Teaching and Learning; iii) Technical and Institutional Support

Component 1: Enhancing Access to ECD and Basic Education

The aim of this component 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. On the supply side, access will be expanded through construction of new classrooms ECD and LBS classrooms, and continued provision of school transportation in selected communities. On the demand side, access will be expanded through a program which modernizes 'daaras' (Koranic schools) by introducing an adapted curriculum through a results oriented financing model in targeted regions, supported by a sensitization campaign.

Component 2: Improving Quality of Teaching and Learning

Under this component the Project will support a set of interventions that will lead to the implementation of a revised curriculum for ECD, lower basic, and upper basic schools, with a particular focus on English. In addition it will develop a strategic framework and coherent policy for an improved teacher training and professional development pre-service and in-service teacher training which views teacher education along a continuum.

Component 3: Technical and Institutional Support

This component will support capacity building for evidence based decision making in the sector and provide support for the implementation of the communication strategy including procuring equipment, materials, publishing, dissemination, logistics, and administration. The Project will also provide support to the implementing agency for capacity building initiatives and project management as well financing the project coordination unit (PCU) salaries and operating costs to coordinate the proposed project, and building MoBSE and MoHERST staff capacity development.

II. Objective of the Environmental and Social Management Framework (ESMF)

The objective of this Environmental and Social Management Framework (ESMF) is to provide an environmental and social screening process for future infrastructure investments for which the exact locations are not known prior to appraisal, and for which appropriate mitigation measures might be required. The ESMF is intended to be used as a practical tool during project implementation.

The proposed screening process would be consistent with the Bank's safeguard policy OP 4.01 Environmental Assessment. This policy requires that all Bank-financed operations are screened for potential environmental and social impacts, and that the required environmental work be carried out on the basis of the screening results. Thus, the screening results may indicate that (i) no additional environmental work would be required; (ii) the application of simple mitigation measures by qualified staff would suffice; or (iii) a separate environmental and social impact assessment (ESIA) would be required.

Although the potential environmental and social impacts of the infrastructure investments are expected to be generally minimal, potentially significant localized impacts may occur, thus requiring appropriate mitigation. Potential social impacts would be addressed in the context of the Resettlement Policy Framework (RPF). The RPF is to be prepared as a separate document and will outline the policies and procedures to be applied in the event of land acquisition, loss of livelihood or access to livelihood under the project.

III. Scope of Work

To develop an Environmental and Social Management Framework (ESMF) the consultants will carry out the following tasks:

- a) Review The Gambia's environmental policies, laws, procedures, regulatory and administrative frameworks to determine which legal requirements are relevant to the infrastructure investments under the project and therefore will have to be incorporated into the ESMF, and make recommendations as appropriate;
- b) Review the Bank's ten Safeguard Policies and (i) determine which of these policies are likely to be integrated as a result of future infrastructure investments under the project; (ii) identify gaps between the Safeguard Policies and the national legislation and make recommendations as to how to implement the relevant safeguard Policies in the context of the ESMF;
- c) Review the bio-physical and socio-economic characteristics of the project area and (i) identify potential environmental and social impacts that might result from future infrastructure investments; (ii) propose appropriate mitigation measures; (iii) outline environmental impact assessment procedures; (iv) establish linkages to the RPF as necessary, and (v) make recommendations regarding the implementation and monitoring of environmental and social mitigation measures in the context of the ESMF as appropriate;
- d) In the light of the available information, develop an environmental and social screening process, including monitoring indicators, for future infrastructure investments under the project, capturing the steps below (and others as appropriate):
 - 1. Screening of physical infrastructure investments
 - 2. Assigning the appropriate environmental categories
 - 3. Carrying out environmental work
 - 4. Review and approval
 - 5. Public consultation and disclosure
 - 6. Monitoring
 - 7. Monitoring indicators
- e) In light of the available information, identify areas that would require institutional strengthening for environmental management, including cost estimates and time horizons, to ensure that the requisite capacity exists under the project to implement the ESMF efficiently;
- f) In light of the above recommendations, prepare an Environmental Management Plan (EMP) for the entire project; the EMP is to outline the institutional responsibilities, including cost estimates and timelines for the (i) identification of environmental and social impacts; (ii) preparation and implementation of mitigation measures; (iii) monitoring of the implementation of mitigation measures; (iv) monitoring indicators; and (v) capacity building needs, including related training needs and costs. A summary table should be prepared for ease of reference.

IV. Output

The consultant(s) will prepare an Environmental and Social Management Framework (ESMF) that will be used by project implementers at the planning stage of the physical infrastructure investments. Hence, the ESMF is to be used as a practical tool during project implementation.

V. Reporting

The ESMF will be written in English and will include the following sections:

- Cover page
- Table of contents
- List of acronyms
- Executive summary
- Introduction
- Project description
- Objectives of the Environmental and Social Management Framework (ESMF)
- Methodology used to prepare the Environmental and Social Management Framework (ESMF)
- Overview of The Gambia's environmental policies, laws, procedures, regulatory and administrative frameworks
- Overview of the World Bank's ten Safeguard Policies
- Environmental impacts due to infrastructure investments
- Social impacts due to infrastructure investments
- The environmental and social screening process:
 - Steps required
 - Annexes
 - Environmental and Social Screening Form (Sample)
 - Environmental and Social Checklist (Sample)
 - Procedures for the construction/rehabilitation of infrastructure investments requiring environmental work
 - Summary of the World Bank's Safeguard Policies
 - Others, as necessary
- Environmental Management Plan (EMP) for the entire project
 - Proposed infrastructure investments
 - Environmental and social impacts
 - Mitigation measures
 - Institutions responsible for implementing the mitigation measures
 - Institutions responsible for monitoring the implementation of the mitigation measures
 - Timing
 - Costs
 - Monitoring indicators
 - Summary table
- Recommendations
- List of individuals/institutions contacted
- References

VI. Staffing of the Consultancy and Duration of Assignment

The consultancy would require expertise in environmental assessment, environmental management and strengthening of institutional capacity in these areas.

The duration of the assignment would be about five weeks, involving three weeks of field and two weeks writing the Environmental and Social Management Framework (ESMF).

An electronic copy of the ESMF should be made available to the Government of The Gambia and the World Bank by end of2017, and the final draft electronic document should be available before appraisal.

ANNEX 9: THE METHODOLOGY FOR THE STUDY

The methodology consisted of the following:

- Literature Review
- This consisted of a review of relevant background documents (the draft PAD, relevant legal and policy documents on environmental management, the Audit Report of the implementation of the READ project, etc.). The list of the documents consulted is provided in **Annex 7**.
- Consultations and visits to potential sites
The visits and the consultations provided the opportunity to:
 - See some of the potential project intervention sites and to discuss with the local communities about the project and some of the potential environmental and social issues such as clean environment and land
 - Collect any particular concerns/issues that the beneficiaries may wish to raise about the proposed project;
 - Identify specific interests and discuss potential roles and responsibilities of beneficiaries that would facilitate their participation, ownership and sustainability of the project.

The consultations took the form of interviews with representatives of relevant government agencies and focus group discussions with potential project beneficiaries at the community level. The list of persons interviewed is attached as **Annex 6a and 6b**. The summary of the interviews are attached as **Annex 5a and 5b**.

National workshop.

A national workshop was convened to discuss the draft audit report with the representatives of the various stakeholders. The comments/observations coming out of the workshop and those from the World Bank were incorporated in the final report to improve quality and accuracy.

ANNEX 10: CHANCE FINDS PROCEDURES

This Chance Finds Procedure shall be applied in case previously unknown culturally valuable materials are unexpectedly discovered during the implementation of the Project:

- In the case of chance find of any material with possible archaeological, historical, paleontological, religious, or other cultural value, all work at and around the find, feature or site must immediately stop.
- The discovery will be clearly demarcated and secured from unauthorized access, and all found remains will be left where they were found. If necessary, artefacts will be protected and measures to stabilize the area will be implemented.
- Notify the Project Manager/PCU of the findings who in turn will immediately notify the National Council for Arts and Culture for the necessary, assessment, recording and determination of the the next course of action.
- Restart construction and public works only upon authorization of the relevant authorities (the National Council for Arts and Culture under the Ministry of Tourism and Culture).
- Relevant findings will be recorded in the Banks' supervision reports.
- These procedures must be referred to as standard provisions in construction contracts.

ANNEX 11: CODES OF CONDUCT (COMPANY, MANAGER, WORKERS AND PROJECT STAFF) FOR IMPLEMENTING ESHS AND OHS STANDARDS PREVENTING SEXUAL EXPLOITATION AND ABUSE, SEXUAL HARASSMENT, AND VIOLENCE AGAINST CHILDREN

IMPLEMENTING ESHS AND OHS STANDARDS

PREVENTING SEXUAL EXPLOITATION AND ABUSE, SEXUAL HARASSMENT, AND VIOLENCE AGAINST CHILDREN

a) COMPANY CODE OF CONDUCT

The company is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The company is also committed to creating and maintaining an environment in which sexual exploitation and abuse (SEA), sexual harassment (SH), and violence against children (VAC) have no place, and where they will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives, including sub-contractors and suppliers, without exception:

General

1. The company—and therefore all employees, associates, representatives, sub-contractors, and suppliers—commits to complying with all relevant national laws, rules and regulations.
2. The company commits to fully implementing its ‘Contractors Environmental and Social Management Plan’ (CESMP).
3. The company commits to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or nationality, sexual orientation, gender identity, or other status. Acts of SEA/SH and VAC are in violation of this commitment.
4. The company shall ensure that interactions with local community members are done with respect and non-discrimination.
5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or provocative language and behavior, including of a sexual nature, are prohibited among all company employees, associates, and its representatives, including sub-contractors and suppliers.
6. The company will follow all reasonable work instructions (including regarding environmental and social norms).
7. The company will protect and ensure proper use of property (for example, to prohibit theft, carelessness, or waste).

Health and Safety

8. The company will ensure that the project’s occupational health and safety (OHS) Management Plan is effectively implemented by company staff, as well as sub-contractors and suppliers.
9. The company will ensure that all person’s on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents and reporting conditions or practices that pose a safety hazard or threaten the environment.
10. The company will:

- i. Prohibit the use of alcohol during work activities.
 - ii. Prohibit the use of narcotics or other substances which can always impair faculties.
11. The company will ensure that adequate sanitation facilities, which are sex-segregated, safe, lockable, and well-lit, are available on site and at any worker accommodations provided to those working on the project.

Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Violence Against Children

12. Acts of SEA, SH, or VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment, and if appropriate, and with survivor consent, referral to the Police for further action.
13. All forms of SEA, SH, and VAC, including grooming, are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps, or within the local community.
- i. Sexual exploitation is defined as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
 - ii. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
 - iii. Sexual harassment is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.
14. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse. All forms of child labor not in compliance with Gambian law are prohibited.
15. Sexual interactions between the company's employees (at any level) and members of the communities surrounding the workplace are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
16. In addition to company sanctions, legal prosecution of those who commit acts of SEA, SH, or VAC will be pursued if appropriate and only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.
17. All employees, including volunteers and sub-contractors, are highly encouraged to report suspected or actual acts of SEA, SH, and/or VAC by a fellow worker, whether in the same company or not. Reports must be made in accordance with project's SEA/SH and VAC Allegation Procedures.
18. Managers are required to report and act to address suspected or actual acts of SEA, SH, and/or VAC as they have a responsibility to uphold company commitments and hold their direct reports responsible. Reports of SEA/SH and VAC claims may be made only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.

Implementation

To ensure that the above principles are implemented effectively the company commits to ensuring that:

19. All managers sign the project's 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.

20. All employees sign the project's 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in SEA, SH, or VAC.
21. Displaying the Company and Individual Codes of Conduct prominently and in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
22. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
23. An appropriate person is nominated as the company's 'Focal Point' for addressing SEA/SH and VAC issues, including supporting implementation of the SEA/SH Prevention and Response Action Plan, including any SEA/SH-specific grievance resolution procedures or response protocols for the appropriate referral of survivors to available services.
24. Ensuring that an effective SEA/SH Prevention and Response Action Plan is developed, which includes at a minimum:
 - i. **Allegation Procedures** to report and manage SEA/SH and VAC complaints ethically and confidentially through the project Grievance Mechanism (Section 4.3 Action Plan);
 - ii. **Accountability Measures** to protect confidentiality of all involved parties (Section 4.4 Action Plan); and,
 - iii. **Response Protocol** to ensure appropriate, safe, and timely referral of survivors to locally available services (Section 4.7 Action Plan).
25. That the company effectively implements the agreed final SEA/SH Prevention and Response Action Plan, providing feedback to the relevant SEA/SH focal points or personnel for improvements and updates as appropriate.
26. All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to ESHS and OHS standards, and the project's Codes of Conduct prohibiting all forms of SEA, SH, and VAC.
27. All employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the project's Codes of Conduct prohibiting all forms of SEA, SH, and VAC.

I do hereby acknowledge that I have read the foregoing Company Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and ESHS standards, and to prevent and respond to SEA, SH, and VAC. I understand that any action inconsistent with this Company Code of Conduct or failure to act mandated by this Company Code of Conduct may result in disciplinary action.

Company name: _____

Signature: _____

Printed Name: _____

Title: _____

Date: _____

b) Manager's Code of Conduct

Managers at all levels have a responsibility to uphold the company's commitment to implementing the ESHS and OHS standards, and preventing and addressing SEA/SH and VAC. This means that managers have an acute responsibility to create and maintain an environment that respects these standards and prevents SEA/SH and VAC. Managers need to support and promote the implementation of the Company Code of Conduct. To that end, managers must adhere to this Manager's Code of Conduct and sign the Individual Code of Conduct. This commits them to supporting the implementation of the CESMP and the OHS Management Plan and developing systems that facilitate the implementation of the SEA/SH Prevention and Response Action Plan. They need to maintain a safe workplace, as well as an environment at the workplace and in the local community that is free from all forms of abuse and violence, including SEA/SH and VAC. These responsibilities include, but are not limited to:

Implementation

1. To ensure maximum effectiveness of the Company and Individual Codes of Conduct:
 - i. Prominently displaying the Company and Individual Codes of Conduct in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
 - ii. Ensuring all posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
2. Verbally and in writing explain the Company and Individual Codes of Conduct to all staff.
3. Ensure that:
 - i. All direct reports sign the 'Individual Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.
 - ii. Staff lists and signed copies of the Individual Code of Conduct are provided to the OHS Manager and the client.
 - iii. Participate in required trainings and ensure that staff also participate as outlined below.
 - iv. Put in place a mechanism for staff to:
 - (a) report concerns on ESHS or OHS compliance; and,
 - (b) confidentially report SEA/SH or VAC incidents through the specific procedures set out under the Grievance Mechanism (GM) to manage SEA/SH and VAC complaints ethically and confidentially.
 - v. Staff are encouraged to report suspected or actual ESHS, OHS, SEA/SH or VAC issues, emphasizing the staff's responsibility to the Company and the country hosting their employment, and emphasizing the respect for confidentiality.
4. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of SEA and SH from being hired, re-hired or deployed. Use background and criminal reference checks for all employees.
5. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:
 - i. Incorporate the ESHS, OHS, SEA/SH and VAC Codes of Conduct as an attachment.
 - ii. Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.

- iii. Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures against SEA/SH and VAC, to investigate allegations thereof, or to take corrective actions when SEA/SH or VAC incidents have occurred, shall not only constitute grounds for sanctions and penalties in accordance with the Individual Codes of Conduct but also termination of agreements to work on or supply the project.
- 6. Provide support and resources to the relevant personnel or focal points implementing the SEA/SH Prevention and Response Action Plan to create and disseminate internal sensitization initiatives through the awareness-raising strategy under the plan.
- 7. Ensure that any SEA/SH or VAC issue warranting Police action is reported to the Police, the client and the World Bank immediately, but only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.
- 8. Report and act according to the response protocol (Section 4.7 Response Protocol) any suspected or actual acts of SEA/SH and/or VAC as managers have a responsibility to uphold company commitments and hold their direct reports responsible. Reports of SEA/SH and VAC claims may be made only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.
- 9. Ensure that any major ESHS or OHS incidents are reported to the client and the supervision engineer immediately.

Training

- 10. The managers are responsible to:
 - i. Ensure that the OHS Management Plan is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,
 - ii. Ensure that staff have a suitable understanding of the CESMP and are trained as appropriate to implement the CESMP requirements.
- 11. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding elements of these Codes of Conduct related to mitigation of SEA/SH and VAC risk. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the SEA/SH Prevention and Response Action Plan for addressing SEA/SH and VAC risk mitigation.
- 12. Managers are required to attend and assist with the project facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations, including collecting satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.
- 13. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:
 - i. OHS and ESHS; and,
 - ii. SEA/SH and VAC required of all employees.
- 14.** During civil works, ensure that staff attend ongoing OHS and ESHS training, as well as the monthly mandatory refresher training course required of all employees to combat increased risk of SEA/SH and VAC.

Response

- 15. Managers will be required to take appropriate actions to address any ESHS or OHS incidents.

16. With regard to SEA/SH and VAC:

- i. Provide input to the SEA/SH and VAC Allegation Procedures (Section 4.2 Action Plan) and Response Protocol (Section 4.7 Action Plan) as part of the procedures for the ethical and confidential management of SEA/SH claims under the project GM and incorporated under the SEA/SH Prevention and Response Action Plan.
- ii. Once adopted by the Company, managers will uphold the Accountability Measures (Section 4.4 Action Plan) set forth in the SEA/SH Prevention and Response Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidents of SEA/SH and VAC (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
- iii. If a manager develops concerns or suspicions regarding any form of SEA/SH or VAC by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GM, but only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.
- iv. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made
- v. If a Manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify the respective company and the relevant SEA/SH focal points or personnel with the company. The Company will be required to appoint another manager without a conflict of interest to respond to complaints.
- vi. Ensure that any SEA/SH or VAC issue warranting Police action is reported to the Police, the client and the World Bank immediately, only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.

17. Managers failing address ESHS or OHS incidents or failing to report or comply with the SEA/SH and VAC provisions may be subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:

- i. Informal warning.
- ii. Formal warning.
- iii. Additional Training.
- iv. Loss of up to one week's salary.
- v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- vi. Termination of employment.

18. Ultimately, failure to effectively respond to ESHS, OHS, SEA/SH and VAC cases on the work site by the company's managers or CEO may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the foregoing Manager's Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH and VAC requirements. I understand that any action inconsistent with this Manager's Code of Conduct or failure to act mandated by this Manager's Code of Conduct may result in disciplinary action.

Signature: _____
Printed Name: _____
Title: _____
Date: _____

c) Individual Code of Conduct

I, _____, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing sexual exploitation and abuse (SEA), sexual harassment (SH), and violence against children (VAC) is important.

The company considers that failure to follow ESHS and OHS standards, or to commit acts of SEA/SH or VAC —be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit SEA/SH or VAC may be pursued if appropriate, and only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, SEA/SH and VAC as requested by my employer.
2. Will always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities.
3. Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
4. Implement the OHS Management Plan.
5. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can always impair faculties.
6. Consent to Police background check.
7. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or nationality, sexual orientation, gender identity, or other status.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not engage in sexual exploitation, which is defined as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
10. Not engage in sexual abuse, which is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
11. Not engage in sexual harassment, which is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.
12. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

13. I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
14. Consider reporting through the GM or to my manager any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

Regarding children under the age of 18:

15. Wherever possible, ensure that another adult is present when working in the proximity of children.
16. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
17. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
18. Refrain from physical punishment or discipline of children.
19. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
20. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age.
21. Take appropriate caution when photographing or filming children (See Annex 2 for details).

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

22. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
23. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
24. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
25. Ensure images are honest representations of the context and the facts.
26. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week’s salary.

5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as SEA/SH or VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Project Staff Code of Conduct

Implementing ESHS and OHS Standards

Preventing Sexual Exploitation and Abuse, Sexual Harassment, and Violence Against Children

I, _____, acknowledge that adhering to environmental, social health and safety (ESHs) standards, following the project's occupational health and safety (OHS) requirements, and preventing sexual exploitation and abuse (SEA), sexual harassment (SH), and violence against children (VAC) is important, but also dealing with the complaints received from People Affected by the Project (PAP).

MOBSE considers that failure to follow ESHS and OHS standards, or not respecting PAP privacy in dealing with their complaints received via letter, phone calls, emails or social media constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit SEA/SH, VAC, or do not respect privacy of the PAP may be pursued if appropriate. Reports of SEA/SH and VAC claims may be made only upon informed survivor consent, or in the case of a minor, with appropriate caregiver consent.

I agree that while working on the project I will:

27. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, SEA/SH and VAC as requested by my employer.
28. Will always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities.
29. Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
30. Implement the OHS Management Plan.

31. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can always impair faculties.
32. Consent to Police background check.
33. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or nationality, sexual orientation, gender identity, or other status.
34. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
35. Not engage in sexual exploitation, which is defined as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
36. Not engage in sexual abuse, which is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
37. Not engage in sexual harassment, which is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.
38. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
39. Diligently treat complaints received from PAP by respecting their privacy.
40. I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
41. Consider reporting through the GM or to my manager any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by MOBSE, FIOH or not, or any breaches of this Code of Conduct.

Regarding children under the age of 18:

42. Wherever possible, ensure that another adult is present when working in the proximity of children.
43. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
44. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
45. Refrain from physical punishment or discipline of children.
46. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
47. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age.
48. Take appropriate caution when photographing or filming children (See Annex 2 for details).

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

49. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
50. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
51. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
52. Ensure images are honest representations of the context and the facts.
53. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Project staff Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as SEA/SH or VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

ANNEX 12: GRIEVANCE LOG FOR NON-SEA/SH COMPLAINTS

[illegible]

ANNEX 13

CURRICULUM VITAE (CV)

1. **Name** : Papa Ansoumana Moustapha MANE _____

2. **Position** : Consultant in Environment and Social Safeguards _____

- **Contacts** : taphamane@gmail.com ; 00220 3363322

3. **Date of Birth** : _____ **Nationality** : Senegalese/French _____

4. **Education** : _____

<u>School, college and/or University Attended</u>	<u>Degree/certificate or other specialized education obtained</u>	<u>Date Obtained</u>
University of Rennes 1, France	Master Sciences and Environment, Specialty Biodiversity –Ecology and Environment Management	<u>2009</u>
University of Clermont 2, France	Bachelor in Geography and Environment	<u>2007</u>
University of Gaston Berger Saint-Louis, Senegal	University Diploma in Geography	<u>2005</u>

5. **Professional Certification** :

- ✓ UN Environment ENV002 From Source to Sea to Sustainability a course of study offered by UN Environment, *April 2018*.
- ✓ “Gestion des Ressources Naturelles et Développement des Territoires en Afrique”, Université Paris 1 Panthéon-Sorbonne, *November 2017*.
- ✓ UN Environment ENV001-ADV: Advanced Ecosystem Approach and Systems Thinking a course of study offered by UN Environment, *December 2016*.
- ✓ ENV001 ECOSYSTEMS – UNEP a course of study offered by UN Environment, *October 2016*.
- ✓ World Bank Environmental and Social Framework Fundamentals July 13 -17, 2020. Washington, D.C

6. **Membership in Professional Associations** :

General Secretary of the Senegalese Association of Clermont-Ferrand, France in 2007,
Member of The Water Network, Global Water Intelligence, Environmental Impact Assessment, Rivers Network, [YoungProfsNet](#).

7. Countries of Work Experience: France, Spain, Senegal, Guinea Bissau, Gambia

8. Languages :

Language	Speaking	Reading	Writing
Français	Fluent	Fluent	Fluent
Anglais	Advance	Advance	Advance
Espagnol	Fair	Fair	Fair
Wolof	Fluent	Fluent	Fluent
Diola	Fluent	Fluent	Fluent

9. Employment Record:

Since February 2020

Employer: **World Bank**

Position held: **Environmental and Social Safeguards/Social Risk Management (International) Consultant, World Bank (based in The Gambia):**

- Projet Développement Intégré de l'Agriculture et de l'Elevage en Zone Pluviale en Mauritanie (PDIAEZP)/Integrated Agriculture and Livestock in Rainfed Areas in Mauritania
- West Africa Regional Off-Grid Electrification Project (ROGEP) with ECOWAS and BOAD
- West Africa Regional Food System Resilience Program (FSRP) with CILLS, ECOWAS, CORAF

Since May 2019

Employer: **Ministry of Basic and Secondary Education and Ministry of Higher Education Research, Science and Technology The Gambia**

Position Held: International Consultant in Environment and Social Safeguards for The Gambia Education Sector Support Project (GESSP) and Africa Centers of Excellence for Development Impact/ ACE Impact.
World Bank funded Project

Since November 2018

Employer : **National Water and Electricity Company**

Position held : International Consultant in Environment and Social Safeguards for The Gambia Electricity Restoration and Modernization Project and ECOWAS Regional Electricity Access Project (ECOWAS-REAP).
World Bank funded Project

From July 2017 to May 2019

Employer : **AECOM (International Ingeneering Company)**

Position held : Environmental and Social Management Plan/Resettlement Plan (ESMP/RP) Expert, OMVG Energy Project (Interconnection) in The Gambia_funded by World Bank, European Investment Bank, African Development Bank, Agence Française de Développement...etc. **World Bank is part of funding institutions**

From June 2014 to June 2017

Employer : **IDEV-IC**

Position held : Consultant in Environment and Social Safeguards management

From April to May 2014

Employer : **EDE International**

Position held : Consultant in Environment and natural resources management

From March 2013 to April 2014

Employer : **TROPICA Environmental Consultants**

Position held : Consultant in Environment and natural resources management

From October 2012 to February 2013

Employer : **HPR-ANKH Consultants**

Position held : Junior Consultant in Environment and natural resources management

From September 2010 to March 2011

Employer : **UNITED NATIONS (Water for Life Zaragoza, Spain)**

Position held : Intern

From April to September 2009

Employer : **OMVS (Senegal River Basin Management)**

Position held : Intern

10.Details tasked assigned	11. Work Undertaken that Best Illustrates Capability to Handle the Tasks Assigned
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<p>-Provide overall technical social and environmental safeguards oversight for the project preparation and implementation</p> <p>- Drafting of COVID-19 Protocol for a safe implementation of consultation and civil works while following the WHO recommendations and guidelines, also national regulations on social distancing and banning of public gatherings</p> <p>-Due diligence on pipeline projects by investigating borrowers performance on for example:</p> <p>-Environment: energy use, waste, pollution, natural resource conservation, habitat and biodiversity conservation</p> <p>-Social criteria: working conditions show high regard for employees' health and safety? Are other stakeholders' interests taken into account?</p> <p>Treatment of affected parties on previous projects? Fairly compensated? Vulnerable people and parties were taken into consideration?</p> <p>-Governance: Evaluation of institutional and legal framework of the borrower compare to World Bank Environmental and Social Framework, analyse gaps and propose solution for a smooth implementation like the necessary capacity building.</p> <p>-Provide necessary coordination and relevant inputs into preparation of potential ESIA, ESMP, RAP, RPF, ESMF, GRM, SEP, LMP</p> <p>-GBV mapping of the affected project area according new Good Practice Note</p> <p>-Support PIUs specialists to develop capacity building plans, study tours, liaison with awareness and communication units, etc.</p>	<p>- Projet Développement Intégré de l'Agriculture et de l'Elevage en Zone Pluviale en Mauritanie (PDIAEZP)/Integrated Agriculture and Livestock in Rainfed Areas in Mauritania</p> <p>- West Africa Regional Off-Grid Electrification Project (ROGEP) with ECOWAS and BOAD</p> <p>- West Africa Regional Food System Resilience Program (FSRP) with CILLS, ECOWAS, CORAF</p>
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<ul style="list-style-type: none"> -Provide overall technical social and environmental safeguards oversight for the project preparation and implementation under the general management of the PCU Project Manager. -Provide necessary coordination and relevant inputs into preparation of potential ESIA, ESMP and ARAP, as necessary, for projects under preparation and implementation. -Screening of sub-projects identified under the projects, ensuring the screening process complies with the ESMF and RPF; and advice on the site-specific safeguard's instruments required. -Ensuring that bidding documents and contracts include necessary environmental and social safeguards provisions. -Analyzing project implementation reports to ensure that all work is completed in full compliance with Safeguards Policies; supervising contractors' performance in handling specific environmental and social issues. -Preparing relevant parts of required environmental and social monitoring reports, including reports on ESMP implementation status. Preparation of regular safeguards monitoring reports for the PCU, including preparation of the social safeguards, gender sensitivity and beneficiary engagement content of project progress reports submitted to the World Bank. -Guide the PMU specialists in undertaking consultations and establishing a Grievance Redress Mechanism, GBV mapping and a Stakeholder Engagement Plan. -Deliver environmental and social training sessions classroom style and also on-the job training - Support PMU specialists to develop capacity building plans, study tours, liase with awareness and communications units, etc - Drafting of COVID-19 Protocol for a safe implementation of consultation and civil works while following the WHO recommendations and guidelines, also national regulations on social distancing and banning of public gatherings -Review of Land donation process for new schools to be built according OP 4.12 policy 	<p>Project / Mission Name: <u>Gambia Education Sector Support Project and Africa Centers of Excellence for Development Impact/ ACE Impact funded by The World Bank</u></p> <p>Year: 2019-(in progress)</p> <p>Location: The Gambia</p> <p>Main features of the project:</p> <p>Project Management and Institutional Support sub-component; Sub-component Implementation of the communication strategy; Sub-component Recruitment and Deployment of Teachers; Improvement of Teacher Education and Professional Development sub-component; Sub-component Improve the quality of teaching and learning; Sub-component Developing opportunities and access for out-of-school children; Sub-component Expanding the School and Classroom Network</p> <p>Position: International Environment and Social Consultant</p> <p>Activities:</p> <p>Construction of schools with the necessary equipment (school canteens, separate toilets, housing for teachers, water supply, equipment for people with reduced mobility) to improve the frequency of children</p>
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<ul style="list-style-type: none"> - Provide overall technical environmental and social safeguards oversight during project implementation. -Review and improve Screening tools for sub-projects prepared by the PMU. -Review and improve environmental and social assessment documentation and management plans -Guide PMU in contractual arrangements with construction companies with regard to their Environmental and Social requirements -Support the PMU specialists in discussions with NEA -Guide the PMU specialists in undertaking consultations and establishing of a Stakeholder Engagement Plan, GBV mapping services and Grievance Redress Mechanism -Help to streamline procedures and processes related to development, review, monitoring and reporting of safeguards instruments -Undertake supervision visits to sites to review and evaluate quality of construction works and implementation of safeguards instruments -Deliver environmental and social training sessions classroom style and also on-the job training - Support PMU specialists to develop capacity building plans, study tours, liase with awareness and communications units, etc -GBV mapping of the affected project area according new Good Practice Note. - Drafting of COVID-19 Protocol for a safe implementation of consultation and civil works while following the WHO recommendations and guidelines, also national regulations on social distancing and banning of public gatherings 	<p><u>Project / Mission Name:</u> Gambia Electricity Restoration and Modernization Project and ECOWAS Regional Electricity Access Project (ECOWAS-REAP) funded by the World Bank</p> <p>Year: 2018-(in progress)</p> <p>Location: The Gambia</p> <p>Main features of the project: The proposed project will support The Gambia in reaching its goals of increasing access to reliable and competitively priced electricity, which is essential for business development, job creation, income generation, and international competitiveness. The proposed project will also help improve the financial position of NAWEC through reduced dependence on expensive HFO-based generation.</p> <p>Position: International Environment and Social Consultant</p> <p>Activities: Component 1: On-grid solar PV. This will finance a 10-20 MW solar PV plant including battery back up to minimize grid absorption concerns. Component 2: Transmission and Distribution (T&D) upgrades. This component would make the T&D (new 225kV line, NCC and substations) upgrades necessary to absorb the additional generation capacity; prepare for future capacity expansion including OMVG and other pipeline projects; reduction of T&D losses; and future grid extension. West African Power Pool Component: 150 MWp grid connected PV plant 'Plug & Play' in The Gambia</p>
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<p>- Parcel survey</p> <p>Contribute to the planning of parcel surveys at the request of ESMP / RP experts in Dakar; Monitor fieldwork and follow up on parcel surveys and the socio-economic survey conducted; Responsible for ensuring that sub-contractors are conducting their parcel surveys in accordance with the indicated World Bank recommendations and requirements; Must ensure that Awareness campaign sessions are conducted in each of the local authorities concerned before the start of the parcel study and then during the implementation of the RAP.</p> <p>- Development and implementation of the Resettlement Plan (RP)</p> <p>Contribute to the development of Resettlement Plans (RP) following the parcel study at the request of the ESMP/RP; updating of the price scale; Monitor the implementation of the compensation process; In particular ensure that the process is carried out in accordance with the World Bank requirements.</p> <p>- Environmental and Social Construction Site Management Plan (ESCMP)</p> <p>Monitor contractors' compliance with their own Environmental and Social Site Management Plan (ESMP); Conduct weekly ESSH inspections and produce an inspection report.</p> <p>- Counsel and Coordination between, National Monitoring Committee and Local Monitoring Committee</p> <p>Ensure the transmission of information and the coordination of actions between the contractors and the National Monitoring Committee and Local Monitoring Committees concerning the planning of the works, the complaints and contentious cases. Offer assistance and advice to Local and National Monitoring Committees.</p>	<p>Project / Mission Name: <u>Gambia River Basin Management (Energy Project) funded by World Bank, European Investment Bank, African Development Bank, Agence Française de Développement...etc.</u></p> <p>Year: 2017</p> <p>Location: The Gambia and South of Senegal</p> <p>Main features of the project: The OMVG 225 kV interconnection line project is intended to transport the energy generated by the Sambangalou and Kaléta dams to the main centers of each of the OMVG countries. The interconnection line extends over a total length of 1,677 km through Senegal, Guinea, Guinea-Bissau and The Gambia.</p> <p>Position: Environmental and Social Management Plan/Resettlement Plan (ESMP/RP) Expert, Interconnection Gambia and south of Senegal</p> <p>Activities:</p> <ol style="list-style-type: none"> 1. Hydroelectric development (HAE) Sambangalou on the Gambia River in Senegal with a retaining structure and a hydroelectric power plant with an installed capacity of 128 MW with an energy production of 402 GWh / year. 2. The electrical interconnection of the four OMVG Members States including 1677 km of power transmission line 225 kV, 15 transformer stations and two control centers, one on the Kaleta site and the Sambangalou site.
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<p>Write a weekly activity report to be sent to the ESMP / RP AECOM Experts based in Dakar;</p>	
<p>-Preparation of the environmental and social studies of the Sub-Projects selected by the PDIDAS for funding;</p> <p>- Environmental and Social characterization of the Subproject sites;</p> <p>- Inventory of the types of producers practice in relation to the data sheets;</p> <p>- Producer surveys to assess their resilience to climate uncertainties and threats to their business and health;</p> <p>-Defining the capacity building needs and training required to ensure that sub-projects are environmentally and socially sustainable.</p> <p>(Assistance of the Senior Environmental and Social Experts)</p>	<p><u>Project / Mission Name:</u> Inclusive and Sustainable Development Project for Agro-business in Senegal (PDIDAS) funded by the World Bank</p> <p>Year: 2016</p> <p>Location: Louga and Saint-Louis (Ngalam Valley and Lake Guiers)</p> <p>Main features of the project: PDIDAS aims to develop a commercial and inclusive agriculture that takes into account both the small family farm and the securing of private investments. The mission translates, through investments in infrastructure, through technical assistance and support from producers throughout the agro-business value chains.</p> <p>Position: Consultant in Environment and Natural Resource Management</p> <p>Activities: Hydro-agricultural installations, rehabilitation of Perimeters and farms, construction of production tracks and infrastructure to support economic activity. But also capacity building and training for a sustainable agro-business taking into account the environment.</p>

<ul style="list-style-type: none"> - Evaluation of the impacts of developments on the biophysical and socio-economic environment ; - Identification, description and quantification of measures to protect the environment and population ; - Analysis of environmental and social sensitivity of the study area ; - Maximize the positive effects of rehabilitation of water retention structures on the environment and on the beneficiary population, while minimizing negative impacts ; - Proposal for corrective measures related to climate change and integrate them to Prior Detailed Project at the time of study; - Local features integrated for drafting an environmental and social protection section to be inserted in the tender documents. 	<p><u>Name of assignment or project :</u> ESIA Program to support the <u>National Agricultural Investment Programme (PAPSEN) Realization of design studies (Prior Detailed Project), insert environmental clauses in tenders, then control and monitoring of rehabilitation works</u></p> <p>Year : 2016-2018</p> <p>Location : Thiès, Fatick, Kolda, Sedhiou (Senegal)</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : Construction of valleys, micro-dams, irrigation schemes and infrastructures to support agriculture business and fight poverty.</p>
<ul style="list-style-type: none"> - Preparation of the project notice and terms of reference ; - Context of the study, description of the different components of the project, description of basic biophysical and social conditions, drafting of public consultation reports ; - Analysis of the environmental and social sensitivity of the study area, biophysical impacts as well as improvement and mitigation measures ; - Carrying out the analysis of occupational risks ; - Development of the Environmental and Social Management Plan. 	<p><u>Project / Mission Name:</u> Strategic Environmental Assessment of <u>rural roads of the Community Development Emergency Program (PUDC) managed by UNDP</u></p> <p>Year: 2016-2017</p> <p>Location: Kédougou, Matam</p> <p>Position Held: Consultant in Environment and natural resources management</p> <p>Activities performed by the project: construction of tracks</p>

<ul style="list-style-type: none"> - Identification of optimal strategies for achieving environmental objectives (qualitative and quantitative protection of water resources) ; - Proposal for measures to reduce and prevent water pollution and analysis of the environmental sensitivity of the study area ; - Promotion and popularization of techniques for the rational and sustainable use of water resources ; - Assessment of the impact of current and future exploitation of water resources on ecosystems. <p>(Assistance of the Senior Environmentalist Expert)</p>	<p><u>Name of assignment or project</u> : Studies for the development of the water resources management plans of the province of Casamance PEPAM-UE funded by EU and EIB</p> <p>Year : 2016-2018</p> <p>Location : Sédhiou, Kolda, Tambacounda</p> <p>Main characteristics of the project : Promote increased access to water by promoting sustainable resource management at the scale of the Water Resources Management and Planning Unit</p> <p>Position held : Consultant in Environment and Natural Resources Management, Deputy of the Head of Mission</p> <p>Activities performed by the project : Development of a sustainable water resources management plan taking into account all development sectors of the study area and anticipating future developments in all sectors activities.</p>
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<ul style="list-style-type: none"> - Analysis of the potential impacts of climate change on ecosystems of river basin ; - Assessment of the degree of management of climate variability as well as adaptation and mitigation measures already in place or being implemented at basin level ; - Participatory identification and planning of sustainable basin adaptation and mitigation processes (regional, national and local) with other team experts ; - Proposal of an operational plan for the implementation of pilot projects for adaptation and mitigation of impacts due to climate change : institutional framework, nature and scope of activities, financing mechanism (with the team). <p>(Assistance of the Senior Environmentalist Expert)</p>	<p><u>Name of assignment or project :</u> <u>Assessment of the vulnerability of the Senegal river basin to climate change and development of a plan for adaptation and reinforcement of the basin resilience, as well as the updating of the water resource management models used by the OMVS funded by the World Bank</u></p> <p>Year : 2016-2018</p> <p>Location : the Senegal River basin divided between Guinea, Mali, Mauritania and Senegal</p> <p>Main characteristics of the project : An in-depth diagnosis in order to better understand the current and future climate changes at basin level, their real and potential impacts on the environment, the availability and management of water resources and the socioeconomic life of the basin's populations</p> <p>Position held : Consultant in Environment and Natural Resources Management, Deputy of the Head of Mission</p> <p>Activities performed by the project : Assessing the impact of climate change on the environment and natural resources, assessing the vulnerability and resilience of ecosystems and human activities to climate change.</p>
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<ul style="list-style-type: none"> - Preparation of the project notice and terms of reference ; - Context of the study, description of the different components of the project, description of basic biophysical conditions, drafting of public consultation reports ; - Analysis of the environmental and social sensitivity of the study area, biophysical impacts as well as improvement and mitigation measures ; - Carrying out the analysis of occupational risks ; - Development of the Environmental and Social Management Plan. 	<p><u>Name of assignment or project</u> : ESIA Tigo's Data Center in the Urban Pole of Diamniadio</p> <p>Year : 2016-2017</p> <p>Location : Dakar</p> <p>Main characteristics of the project : Tigo plans to acquire a Data Center in order to have modern means to support its business growth and make the Urban Pole of Diamniadio a technological hub in line with the Emerging Senegal Plan</p> <p>Position held : Consultant in Environment and Natural Resources Management</p> <p>Activities performed by the project : Conduct an environmental assessment of the Data Center in all of these components, establish the positive and negative impacts, and the enhancement and mitigation measures.</p>
<ul style="list-style-type: none"> - Assessment of the impact of current and future exploitation on water resources and analysis of the environmental sensitivity of the study area ; - Identification of optimal strategies for achieving environmental objectives (protection of quality and quantity of resources) ; - Assessment of the impact of the use of other resources (like flora) on water and soil ; - Assessment of situations and activities harmful to water and their consequences on ecosystems. <p>(Assistance of the Senior Environmentalist Expert)</p>	<p><u>Name of assignment or project</u> : Studies for the development of two water resources management plans of the Somone and Car-Car Management and Planning Units</p> <p>Year : 2016-2018</p> <p>Location : Thiès, Diourbel et Louga</p> <p>Main features of the project : Support to the Water Resources Management and Planning Department (DGPPE) for the design of the Water Management Plan (WMP) of the 2 Management and Planning Unit: Somone and Car-Car</p> <p>Position held : Consultant in Environment and Natural Resources Management</p> <p>Activities performed by the project : Development of a sustainable water resource management plan taking into account all the parameters of the study area and anticipating the development of these parameters in the future.</p>

<ul style="list-style-type: none"> - Context of the study, description of the different components of the project ; - Description of social and biophysical basis conditions, drafting of public consultation reports ; - Analysis of environmental sensitivity of the study area, biophysical and social impacts as well as measures of improvement and mitigation, realization of the analysis of occupational risks ; - Development of the Environmental and Social Management Plan. 	<p><u>Name of assignment or project</u> : Strategic Environmental and Social Assessment of Fiber Optic Cable Installation by SONATEL</p> <p>Year : 2016-2017</p> <p>Location : 11 of the 14 provinces of Senegal</p> <p>Position held : Consultant in Environment and Natural Resources Management, Deputy of the Head of mission</p> <p>Activities performed by the project : Opening trenches manually, laying fiber optic cables to improve communications (High Definition TV, high-speed internet, money transfers, banks activities, distance education) across the country</p>
<ul style="list-style-type: none"> - Environmental Awareness Campaign with technical services and local stakeholders ; - Presentation of the project's impacts, how the recommendations of population during the public consultations were taken into account and how the negative impacts will be remedied. 	<p><u>Name of assignment or project</u> : Environmental and Social Awareness Campaign for Fiber Optic Cable Installation</p> <p>Year : 2016</p> <p>Location : Matam</p> <p>Main characteristics of the project : Fiber optic installation to improve the telephony and internet network in this project area</p> <p>Position : Consultant in Environment and Natural Resource Management</p> <p>Activities performed by the project : Manual opening of trenches for the installation of fiber optic cables, awareness campaign to inform people living along the national highway.</p>

<ul style="list-style-type: none"> - Context of the study, description of the various components of the project ; - Description of the basic social and biophysical conditions, drafting of public consultation reports ; - Analysis of environmental sensitivity of the study area, biophysical and socio-economic impacts as well as improvement and mitigation measures ; - Development of the Environmental and Social Management Plan. 	<p><u>Name of assignment or project :</u> Environnemental and Social Audit of the Wastwater Treatment Plant of Diamniadio</p> <p>Year : 2016-2017</p> <p>Location : Dakar</p> <p>Position held : Consultant in Environment and Natural Resources Management</p> <p>Activities performed by the project : Collection and treatment of waste water from CICAD, Amadou Mactar Mbow University and the 33 building of the Diamniadio Urban Pole</p>
<ul style="list-style-type: none"> - Writing the terms of reference, description of the different components of the project ; - Description of the biophysical and socio-economic conditions ; - Drafting of public consultations and public consultation report ; - Analysis of environmental sensitivity of the study area, biophysical and socio-economic impacts and the enhancement measures and mitigation ; - Assistance in the implementation of the analysis of risks and hazards; - Development of the Environmental and Social Management Plan by following the performance criteria of the West African Development Bank. 	<p><u>Name of assignment or project :</u> ESIA of the Rehabilitation Project for Irrigated Perimeters in Podor</p> <p>Year : 2016-2017</p> <p>Location : Podor, Senegal</p> <p>Main characteristics of the project: Preparation of APS studies (Preliminary Project Summary, APD (Preliminary Detailed Project) and EIES (Environmental and Social Impact Assessment), preparation of DAOs.</p> <p>Position held : Consultant in Environment and Natural Resources Management, Deputy Head of Mission</p> <p>Activities performed by the project : Rehabilitation of 1,700 ha Irrigated Perimeter, and some 1,000 ha of subsiding of flood water area accompagnied by hydro-agricultural improvements and socio-economic investments by helping women getting land.</p>

<ul style="list-style-type: none"> - Context of the study, description of the various components ; - Environmental and Social profile and analysis of the environmental sensitivity of the study area and external factors to the project ; - Completion of the consultation of stakeholders ; - Analysis of potential impacts of management actions and the subsidy measures and mitigation ; - Drafting of the Environmental and Social Management Framework. 	<p><u>Name of assignment or project</u> : Strategic Environmental Assessment : Program for Agricultural Development and Rural Entrepreneurship (PADAER)</p> <p>Year : 2015-2016</p> <p>Location : Kedougou, Tambacounda, Matam et Kolda</p> <p>Position held : Consultant in Environment and Natural Resources Management, Deputy Head of Mission</p> <p>Activities performed by the project : Irrigation schemes, pastoral units, construction of production tracks and infrastructures to support economic activity.</p>
<ul style="list-style-type: none"> - Context of the study and the terms of reference ; - Description of the different components of the project ; - Description of the biophysical and socio-economic conditions, drafting of public consultations and public consultation report ; - Analysis of environmental sensitivity of the study area, biophysical and socio-economic impacts and the enhancement measures and mitigation ; - Implementation of the analysis of risks and hazards ; - Development of the Environmental and Social Management Plan. 	<p><u>Name of assignment or project</u> : ESIA of Diamniadio Administrative and Business Center</p> <p>Year : 2015</p> <p>Location : Dakar</p> <p>Position held : Consultant in Environment and Natural Resources Management, Deputy Head of Mission</p> <p>Activities performed by the project : Construction of an administrative and business center to accommodate various ministerial departments so that government employees can work in modern premises and decongest downtown of Dakar in same time.</p>

<ul style="list-style-type: none"> - Environmental and Social Awareness Campaign with technical services and local stakeholders ; - Presentation of the project's impacts, how the recommendations of population during the public consultations were taken into account and how the negative impacts will be remedied. 	<p><u>Name of assignment or project</u> : ESIA of the installation of fiber optics on the axis Tambacounda-Kédougou-Moussala</p> <p>Year : 2015</p> <p>Location : Tambacounda-Kedougou-Moussala (Senegal)</p> <p>Position held : Consultant in Environment and Natural Resources Management, development of outreach materials</p> <p>Activities performed by the project : Laying of optical fiber for improving the network of telephony and the internet in this project area.</p>
<ul style="list-style-type: none"> - In charge of the following areas : water resources (surface and groundwater), soil resources, mineral resources and pollution and nuisances (hazardous waste, air, noise water, soil); - Diagnostic of the potentialities, constraints, challenges, and define the outlook for each resource. 	<p><u>Name of assignment or project</u> : Revision of the National Land Settlement for a National Planning and Territorial Development Plan for the next 35 years</p> <p>Year : 2015</p> <p>Location : Senegal</p> <p>Main activities : To establish a diagnosis of the country and then develop a National Planning and Territorial Development in line with Senegal Emerging Plan</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : Make an inventory of natural resources and socio-economic areas of the country, based on an in-depth inventory, assesses Senegal's major areas of development for the next 30 years.</p>

<ul style="list-style-type: none"> - Description of the Datacenter components, description and evaluation of baselines conditions ; - Drafting reports of public consultations, assistance in the completion of the hazard study of the Datacenter ; - Analysis of environmental sensitivity of the study area and setting up the Environmental and Social Management and Monitoring Plan. 	<p><u>Name of assignment or project</u> : ESIA of SONATEL Datacenter, Rufisque, Senegal</p> <p>Year : 2014</p> <p>Location : Dakar</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : As part of the development of its information systems, Sonatel considering creating a Datacenter in order to provide modern, efficient, secure and scalable tools to support growth of business, reduce operating costs and minimize operational risks, while demonstrating low energy and environmental impact.</p>
<ul style="list-style-type: none"> - Context of the study, description of the various components of the project ; - Environmental profile and analysis of environmental sensitivity of the study area, drafting of stakeholders consultation reports ; - Analysis of the potential impacts of development actions planned ; - Environmental and Social Management and Monitoring Framework. 	<p><u>Name of assignment or project</u> : Strategic Environmental Assessment of the Master Plan for the Development of the triangle Dakar-Thies –Mbour, Senegal</p> <p>Year : 2014</p> <p>Location : Dakar, Thies, Mbour</p> <p>Position held: Consultant in Environment and natural resources management</p> <p>Activities performed by the project : Implement an organizational scheme and use of space with a consistency of basic infrastructures to support the movement of Dakar decongestion and promote economic development of the area and the creation of jobs and wealth with sustainable management of the environment and the preservation of sensitive ecosystems.</p>

<ul style="list-style-type: none"> - Inventory of species, development of an effective system of control (in progress), elaborate the term of reference for the Observatory website. 	<p><u>Name of assignment or project</u> : Assistance Mission for the <u>establishment of an observatory of aquatic plants</u></p> <p>Year : 2014</p> <p>Location : Senegalese river basin</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : As part of the fight against invasive species in the Senegal river basin, MCA, SAED and IDEV-ic are about to develop an action plan to fight against these plants that have a negative impacts on both the quantity and quality of Senegalese water river. This action plan will be followed by the setting up of an aquatic species observatory so that solutions would be sustainable.</p>
<ul style="list-style-type: none"> - Verification of environmental and social measures identified during the various phases of the project ; - Ensuring compliance with the developer and subcontractors commitments ; - Checking the implementation of legal provisions relating to the elements of the environment (air, soil, water , wildlife, waste ...) ; - Development of a program for capacity building of the Environment Agency and other structures staff. 	<p><u>Name of assignment or project</u> : Environmental Monitoring of the <u>submarine cable laying Africa Coast to Europe</u></p> <p>Year : 2014</p> <p>Location : Senegal</p> <p>Position : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : Environmental monitoring of the ESMP recommendations, this optical fiber submarine links all the African and European countries located along the Atlantic Ocean coast.</p>

<ul style="list-style-type: none"> - Achievement of the environmental profile and environmental sensitivity of the study area ; - Realization of a biophysical and socio-economic diagnosis ; - Identify any problems that have an impact on the quality and quantity of water resources in the Niayes zone. 	<p><u>Name of assignment or project :</u> Study of the management plan of water resources of the northern coast, Niayes, Senegal</p> <p>Year : 2014</p> <p>Location : Niayes,Senegal</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : Provide to decision makers a coherent framework for strategic planning, but also the relevant information to make the necessary trade-offs between different areas of development and promote participatory and collaborative water governance for its fair dealing and long lasting. Giving communities necessary tools referring to all issues related to water resources and the awareness of the interdependence of different types of water uses beyond administrative boundaries.</p>
<ul style="list-style-type: none"> - Analysis and interpretation of biophysical data, collection of information that could be useful for future environmental and social impact assessment. 	<p><u>Name of assignment or project :</u> Environmental and Social Framework for of IAM Gold's prospection mining permit of Boto, region of Kedougou, Senegal</p> <p>Year : 2013</p> <p>Location : Kedougou</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : IAM Gold started surveys for the exploration of gold in the area of Boféto in Kédougou. Following the positive results, the Company completed the development of the environmental profile of the study area.</p>

<ul style="list-style-type: none"> - Analysis and interpretation of biophysical and socio-economic data; - Participation in the consultation of stakeholders and writing of the public consultation report; - Analysis of environmental sensitivity of the study area and identification of potential impacts ; - Proposition of measures for management of environmental and social monitoring plan to eliminate negative impacts or reduce them to acceptable levels. 	<p><u>Name of assignment or project</u> : ESIA of Improving Food Security and support for market development, initiated by SAED in partnership with the French Development Agency</p> <p>Year : 2013</p> <p>Location : Matam, Senegal</p> <p>Position held: Consultant in Environment and natural resources management</p> <p>Activities performed by the project : This project investigates the feasibility of the development / rehabilitation of 1,000 ha Irrigated Perimeter, and some 1,000 ha of subsiding of floodwater area accompanied by hydro-agricultural improvements, track construction and infrastructure to support economic activity.</p>
<ul style="list-style-type: none"> - Analysis and interpretation of biophysical data ; - Analysis of environmental sensitivity of the study area ; - Identification of impacts and proposition of measures for the Environmental and Social Management and Monitoring Plan following the performance criteria of the IFC ; - Translation of documents from English to French and vice versa 	<p><u>Name of assignment or project</u> : ESIA for the Fight against the Typha by construction of polders in the Senegal River delta Initiated by OMVS and Deutch Cooperation Agency</p> <p>Year : 2013</p> <p>Location : Senegalese river basin</p> <p>Position held : Consultant in Environmentand natural resources management</p> <p>Activities performed by the project : Environmental and Social Assessment of the Construction of polders over 3,000 ha in the fight against harmful aquatic plants that block the development of irrigated agriculture and the production of drinking water in the river basin.</p>

<ul style="list-style-type: none"> - Analysis and interpretation of biophysical data, potential risks and benefits of this project on the environment. 	<p><u>Name of assignment or project</u> : Initial Environmental Analysis for TTS: Trans Works and Services, Installation of a Storage Unit of Batteries, Dakar, Senegal</p> <p>Year : 2013</p> <p>Location : Dakar</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : This project has the potential to contribute to the management of hazardous waste in compliance with environmental and safety batteries standards.</p>
<ul style="list-style-type: none"> - Analysis and interpretation of biophysical data ; - Participation in stakeholder consultation and drafting of public consultation reports ; - Analysis of environmental sensitivity of the study area and identification of potential impacts ; - Proposition of measures for the management plan of environmental and social monitoring in order to eliminate negative impacts or reduce them to acceptable levels ; - Translation of the whole document from French to English. 	<p><u>Name of assignment or project</u> : ESIA Operating heavy minerals (ilmenite, zircon, rutile and leucoxene), Company Sarl POTO, Cacheu region, Guinea Bissau</p> <p>Year : 2013</p> <p>Location : Guinea Bissau</p> <p>Position held: Consultant in Environment and natural resources management</p> <p>Activities performed by the project : heavy minerals production (ilmenite, zircon, rutile and leucoxene).</p>

<ul style="list-style-type: none"> - Analysis and interpretation of biophysical data ; - Writing the memo of work field and terms of reference ; - Assistance for the mapping of atmospheric emissions and noise mapping ; - Analysis of environmental sensitivity of the study area and identification of impacts and proposition of measures for the Environmental and Social Management and Monitoring Plan. 	<p><u>Name of assignment or project</u> : ESIA of Industrial exploitation of Matam phosphates, Mining Society of the Senegal River Valley (SOMIVA), Matam, Senegal</p> <p>Year : 2013</p> <p>Location : Matam, Senegal</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : The expected production during a 30-years operating period is more than 11.5 Mt of phosphate.</p>
<ul style="list-style-type: none"> - Analysis and interpretation of biophysical data ; - Analysis of environmental sensitivity of the study area, writing the description of the project, the work field memo and terms of reference ; - Assistance to achieve the mapping of atmospheric emissions and noise mapping ; - Identification of impact, and proposition of measures for the Environmental and Social Management and Monitoring Plan. 	<p><u>Name of assignment or project</u> : ESIA of Exploitation of phosphates Lime deposits of Lam-Lamby African Investment Group Thies Region, Senegal</p> <p>The production target set by African Investment Group varies around 12,000 to 16,000 tones every 20 days</p> <p>Year : 2013</p> <p>Location : Lam-Lam -Thies, Senegal</p> <p>Position held : Consultant in Environment and natural resources management</p> <p>Activities performed by the project : Environmental assessment of the future mine and the main components of the project for AIG phosphate mining</p>

<p>- Analysis and interpretation of biophysical data, which standards have not been met by the company and the suggestion to take appropriate measures to prevent breaches.</p>	<p><u>Name of assignment or project</u> : Environmental and Social audit of MTOA (firm of Imperial Tobacco Company) Dakar, Senegal</p> <p>Year : 2012-2013</p> <p>Location : Senegal</p> <p>Position held : Junior Consultant</p> <p>Activities performed by the project : Environmental assessment of the production of tobacco MTOA society, develop an audit to see compliance with local legislation in QHSE.</p>
<p>- Analysis and interpretation of biophysical data ;</p> <p>- Analysis of environmental sensitivity of the study area ;</p> <p>- Identification of impact and proposition of measures for the Environmental and Social Management and Monitoring Plan.</p>	<p><u>Name of assignment or project</u> : ESIA of the future Taïba N'diaye wind-farm (125MW) in the province of Thies, Senegal</p> <p>Year : 2012-2013</p> <p>Location : TaïbaN'diaye-Thies, Senegal</p> <p>Position held : Junior Consultant</p> <p>Activities performed by the project : Environmental assessment of the wind farm and all the project components, assistance in realization of the Action and Resettlement Plan.</p>

<ul style="list-style-type: none"> - Analyze UN resolutions, publications and documentations ; - Analyze of media resources of UN-Water for communication campaigns ; - Junior Reporter at the International Conference “Sustainable Water Management in Cities Engaging stakeholders for effective change and action” (13-17 December 2011), UN - Zaragoza - Junior Reporter at the International Conference “The Future of Urban Water: Solutions for Livable and Resilient Cities” (24-26 January 2011), UNESCO - Paris 	<p><u>Name of assignment or project</u> : UNITED NATIONS, Office to Support the international Decade for Action “Water for life” 2005-2015, Zaragoza -Spain</p> <p>Year : 2010-2011</p> <p>Location : Zaragoza, Spain</p> <p>Position held : Intern</p> <p>Activities performed by the project : A brief summarizing of main messages on water and agricultural practices for farmers and governments, a document summarizing a series of good practices and recommendations on water and agricultural practices in Sub-Saharan Africa, a document summarizing main UN milestones on water and agriculture in Africa, translator into Wolof and French during the International Conference, “Sustainable Water Management in Cities Engaging stakeholders for effective change and action” at Zaragoza, 13-17 December 2010.</p>
<ul style="list-style-type: none"> - Analyze of impacts of human activities (hydro-agricultural developments) in the quality of water and the groundwater and in the population living near the river. 	<p><u>Name of assignment or project</u> : Internship at OMVS (Senegal River Basin Agency), Department:of Environment, Senegal</p> <p>Year : April 2009 to September 2009</p> <p>Location : Senegal</p> <p>Position held : Intern</p> <p>Activities performed by the project : Set up a network in order to analyze quality of water in every sensible sector of the River Basin of Senegal and animation, preparation & co animation of meetings.</p>

<p>- Preparation and dissemination of information about water and environment impacts on population living along the Senegalese river to prevent them from mismanagement and all the risks like diseases.</p>	<p><u>Name of assignment or project</u> : Internship at OMVS (Senegal River Basin Agency), Department: of Environment, Senegal</p> <p>Year : April to June 2008</p> <p>Location : Senegal</p> <p>Position held : Intern</p> <p>Activities performed by the project : In collaboration with the department of health of Senegal, we have produced a summary of all best practices to minimize damages on water and then information for population to know how they have to manage water they use if this water is affected.</p>
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Certification

I certify that (1) to the best of my knowledge and belief, this CV correctly describes me, my qualifications, and my experience; (2)

Papa Ansoumana Moustapha MANE

Banjul, 10th February 2020

A handwritten signature in blue ink, appearing to read 'Papa Ansoumana Moustapha MANE', with a stylized, cursive script.